



October 23, 2009

Ms. Lola Brown
Texas Commission on Environmental Quality
SIP Project Manager, Air Quality Division, MC-205
PO Box 13087
Austin, TX 78711-3087

Re: Comments on the Proposed Houston-Galveston-Brazoria (HGB) Attainment
Demonstration State Implementation Plan (SIP) Revision

Dear Ms. Brown:

The Houston-Galveston Area Council (H-GAC) submits this letter as its comments on the Texas Commission on Environment Quality's (TCEQ) proposed HGB attainment demonstration SIP revision. We encourage TCEQ to include a midcourse review in the proposed SIP to assure that adequate measures are included to achieve attainment as expeditiously as possible.

H-GAC supports a mid-course review for the following reasons:

Success in Updating Weight of Evidence (WOE) in Past Midcourse Reviews

A midcourse review was conducted during the 2000 SIP in which Voluntary Mobile Emission Projects (VMEPs) were monitored, evaluated, and updated. The result allowed the SIP to reflect changes in technologies and practices, as well as establish more achievable commitments. H-GAC believes that there should be another opportunity to adjust the SIP for future technology changes and information supporting the WOE that forms the basis of the current proposed SIP. Therefore, the midcourse review should assess the WOE used to establish the SIP.

Uncertainty in Funding of Programs included in Weight of Evidence


Some programs targeting on and off-road emissions in the WOE depend upon future funding appropriations and future legislative action. The assumption in the WOE is that these programs will be properly funded in the future.

H-GAC also anticipates that there may be an increase in the number of nonattainment areas after 2010 designations. Such an increase could reduce funding shares for currently designated nonattainment areas and result in reduced funding to our region. A midcourse review allows the opportunity to include additional funding if appropriated or to establish reasonable amendments to commitments should funding be reduced.

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Thank you for your consideration of H-GAC's comments on the proposed Houston-Galveston-Brazoria attainment demonstration State Implementation Plan revision. H-GAC looks forward to continuing to work with TCEQ to improve air quality and public health for the area.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Steele', with a long horizontal flourish extending to the right.

Jack Steele

SW/ndg