

February 13, 2009

Ms. Carol Caul  
President  
Energy Business Inc,  
685 North Post Oak Lane  
Houston, TX 77024-4606

Dear Ms. Caul:

Thank you for your comments regarding the Houston-Galveston-Brazoria 8-Hour Ozone State Implementation Plan (SIP) Control Measures Short List. The Texas Commission on Environmental Quality (TCEQ) and H-GAC continue to examine a wide range of voluntary control measures. Your letter commented specifically on sections of the report as well as specific control measures. Responses to each of these comments follow:

- *Pay as you drive insurance vs. VMT tax:* H-GAC appreciates your comments. VMT taxes are implemented on a state or federal level rather than a local level. Since the control measures that H-GAC can place on the Final SIP Control Measures Short List must be implemented voluntarily by local governments, this measure will be removed from the final report. Alternatively, pay as you drive insurance can be implemented by insurance providers as a service to their customers. Because of this difference, the pay as you drive insurance measure will remain a part of the Final SIP Control Measures Short List.
- *Bicycles-benefits are incorrectly analyzed and undercounted:* Your comments about the cost effectiveness for bicycle-pedestrian projects are greatly appreciated. Our consultant's figures were taken from data in the Regional Transportation Plan for our region, based on the project cost for building additional bike and pedestrian projects as well as forecasts for use of new and existing trails.
- *On-road speed reduction: both heavy and light vehicles:* H-GAC appreciates your comments. Because this control measure cannot be implemented locally, it is not included in the "short list".

- *Fuel reformulations & vehicle efficiency standards:* H-GAC appreciates your comments. Because these control measures cannot be implemented locally because they cannot be enforced, it was removed from the "short list".
- *Voluntary measures requiring behavior modification & demand reduction, reporting & verification systems / idling – mandatory and voluntary:* H-GAC is currently working with government and business entities within the Houston-Galveston-Brazoria region to develop both the infrastructure (such as truck stop electrification or the installation of auxiliary power units), the regulatory structure, and the Memoranda of Agreement necessary to implement these control measures as part of the SIP.
- *Electric vehicles:* H-GAC recognizes the practical difficulty in the integration of budding technology into established systems and it may not be practicable at this time, however in future years it may be practicable.
- *Stations and facilities for alternative & new fuels:* H-GAC appreciates your comments.
- *Compressed work schedules:* H-GAC appreciates your comments and has already lumped this control measure and teleworking with other commute solution control strategies.
- *Heavy Duty Vehicle Border Inspection Program control measure should be withdrawn from H-GAC short list:* H-GAC appreciates your comments. You are correct, and this control measure will be removed from the final report.

You can follow the progress and see a more detailed summary of the SIP process, the timetable for the rest of the process and the on- and non-road control measures at the H-GAC SIP website: <http://www.h-gac.com/taq/airquality/sip/mobile/default.aspx>

Sincerely,

Shelley Whitworth  
Air Quality Program Manager