



Transportation Policy Council

For the Houston-Galveston Transportation Management Area

3555 Timmons Lane
Houston, Texas 77027

P.O. Box 22777
Houston, Texas 77227-2777

Telephone: 713.627.3200
Fax: 713.993.4508

November 12, 2009

Ms. Margaret Earnest
Air Quality Division, MC 206
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

RE: Exceedence of the National Ambient Air Quality Standard (NAAQS) for Fine Particles (PM 2.5) in the Houston-Galveston-Brazoria Area

Dear Ms. Earnest:

I am writing on behalf of the Houston-Galveston area's Transportation Policy Council (TPC) to inform the Texas Commission on Environment Quality (TCEQ) of our on-going efforts to maintain compliance with the National Ambient Air Quality Standards (NAAQS) for PM 2.5. Because of the success of measures already implemented and the expected benefits of actions now underway, we support efforts of TCEQ to maintain our region's current attainment status for PM 2.5.

As you are aware, the Environmental Protection Agency (EPA) issued a letter to the Governor of Texas requesting the Governor's recommendations regarding potential non-attainment designation of all or part of the Houston-Galveston-Brazoria area for failure to meet the NAAQS for PM 2.5. TCEQ's Clinton Drive monitor is the only monitor in our region that has consistently recorded levels of PM 2.5 at or exceeding the NAAQS. Recent work by TCEQ has determined that the high level of PM 2.5 at the Clinton Drive site is primarily due to dust particles from nearby unpaved roads and parking areas.

Local governments and businesses in the area of the Clinton Drive site have, in cooperation with TCEQ, voluntarily undertaken several actions to lower PM 2.5 levels, including:

- Paving nearby parking lots;
- Spraying unpaved areas with emulsified asphalt;
- Relocating nearby railroad loading areas; and
- Use of cleaner rail switching engines with low sulfur diesel fuels (funded through the Texas Emission Reduction Plan).

These actions have significantly reduced monitored values of PM 2.5 in this area. Once data for 2009 is complete and reviewed, the Clinton Drive Monitor may show compliance with the current PM 2.5 NAAQS.

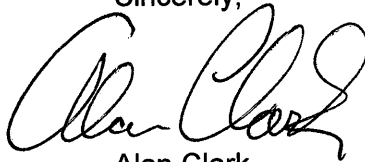
However, it is clear that additional improvements to the pavement and drainage conditions along Clinton Drive in the vicinity of TCEQ's air quality monitor would further contribute to the reduction of road related dust. Therefore, the Houston-Galveston area's Transportation Policy Council (TPC) committed up to \$5 million in federal stimulus funds at its October 2009 meeting for the restoration of pavement, drainage structures and other related improvements on Clinton Drive east of IH 610. The scope of the stimulus funded project will include:

1. Rehabilitation of pavement on Clinton Drive from IH 610 to Fidelity Street, continuing westward toward Federal Road as funding constraints allow;
2. Widening of existing lanes by a total of 3 to 5 feet through pavement of badly degraded shoulders;
3. Drainage improvements to help prevent the tracking of PM 2.5 dust onto Clinton Drive and reduce buildup of silt and dust on the roadway pavement;
4. Landscaping that could help filter PM 2.5 dust from the air; and
5. Prevention of truck parking in undesirable areas.

This work will be performed early in 2010 and will complement the reconstruction of Clinton Drive west of IH 610 already planned for implementation in 2011.

I wish to thank TCEQ for its partnership with and encouragement of the Transportation Policy Council's efforts to maintain compliance with NAAQS for PM 2.5 in the Houston-Galveston-Brazoria area.

Sincerely,



Alan Clark
MPO Director

AC/jbf

CC: Hon. James Patterson, TPC Chair
Mr. Bryan W. Shaw, Ph.D, Chairman, TCEQ
Mr. Mark Vickery, Executive Director, TCEQ
Mr. Jim Harrison, Director of Intergovernmental Relations, TCEQ
Ms. Ashley Wadick, Special Counsel to the Executive Director, Region 12, TCEQ
Mr. Carl Young, Environmental Scientist, EPA
Mr. Alfredo Armendariz, Ph.D, Regional Administrator, Region 6, EPA
Mr. Jack Steele, Executive Director, H-GAC
Mr. Steve Howard, Chief Operating Officer, H-GAC