

Metropolitan Planning Council

January 4, 2012

Air Docket
Attn: EPA-HQ-OAR-2008-0476
Environmental Protection Agency
6102T
1200 Pennsylvania Ave. NW.
Washington, DC 20460

To Whom It May Concern:

Thank you for the opportunity to comment on the possible attainment designation of Northeastern Illinois for the 2008 ozone standard. We strongly urge you to consider the certified 2011 air monitoring data in your decision. Although the 2008 – 2010 data used in your preliminary determination appears to indicate the region was in attainment, incorporating the 2011 data paints a truer picture – that the region clearly does not meet the 2008 ozone standard.

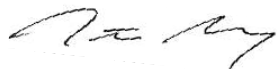
There are compelling reasons not to consider Northeastern Illinois in attainment at this time, in fact it would be a set-back for air quality in the region. With exceedances in 2011 and an update of the standard scheduled for 2013, it is inevitable that the region will revert to a non-attainment status. Therefore considering the region in attainment and the resulting loss of Congestion Mitigation and Air Quality Improvement Program (CMAQ) funds will have a significant negative impact on the transportation system and air quality of northeastern Illinois.

Considering Northeastern Illinois "in attainment" based on the older data opens the door to undoing the very controls that have helped improve our region's air quality and could wrongly prompt some to urge withdrawal of current controls. These controls are essential to improving the air quality that determines the health of residents, notably children, the elderly, and people with respiratory illness. If U.S. EPA takes the 2011 data into consideration it will be clear that Illinois' controls are still needed because our region is currently not in attainment.

In 2010, northeastern Illinois adopted GO TO 2040, its first comprehensive regional plan in more than a century. GO TO 2040 calls for sustainable growth in the region, including actions to support improved air quality. CMAQ funds are being marshaled to implement these actions. One notable example is Pace's \$38.4 million project to enhance express bus service along the Jane Addams Tollway as part of its upcoming reconstruction. The project, specifically identified as a high priority of GO TO 2040, is being implemented entirely with CMAQ funds. If region is placed in attainment, then implementation of this and other important projects will be significantly disrupted until the next designation takes place, harming air quality and increasing congestion.

I urge the EPA to consider the certified 2011 ozone monitoring data when designating nonattainment areas within the new few months.

Sincerely,



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