



Ms. Jane F. Garvey
Administrator
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D.C. 20591

August 9, 2001

- Connecticut
- Delaware
- District of Columbia
- Maine
- Maryland
- Massachusetts
- New Hampshire
- New Jersey
- New York
- Pennsylvania
- Rhode Island
- Vermont
- Virginia

Ms. Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency (1101A)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrators Garvey and Whitman:

At its Annual Meeting, held July 24, 2001 in Newport, Rhode Island, the Ozone Transport Commission (OTC) adopted a Statement of Principles (attached) regarding strategies to reduce ozone-causing emissions from airports and aviation activities. As you know, OTC was created by Congress, pursuant to the Clean Air Act Amendments of 1990, to coordinate ground-level ozone planning in the Northeast and Mid-Atlantic region of the U.S. Its members include: Connecticut, Delaware, the District of Columbia, Maine, Maryland, New Hampshire, New Jersey, New York, Massachusetts, Pennsylvania, Rhode Island, Virginia, and Vermont.

Spurred by concerns regarding the significant increases in ozone-causing nitrogen oxides and other emissions from airports and aviation activities, OTC adopted principles that are designed to promote national and regional strategies and local agreements that result in lasting and significant decreases in aircraft and aviation pollution. The principles also lay the groundwork for OTC to evaluate any strategies that are developed to address these emissions.

As you will note, the OTC principles address the multiple elements of an overall approach to reducing emissions from aircraft, ground service equipment, and other aspects of airport operations. They call for the use of market-based incentives to promote the replacement and retrofit of older, higher polluting aircraft and ground service equipment engines with newer, more efficient models, and for airport authorities to be given the flexibility they need to reach local agreements to reduce pollution from airport sources in ways that match local needs.

Over the next six months, OTC's ad hoc Airports Workgroup (under the auspices of OTC's Mobile Source Committee) will continue to identify and research national, regional and local cost-effective strategies to reduce pollution at airports. We will be closely following the progress of your

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Executive Director

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stakeholder process, and will work to identify opportunities where our efforts can be coordinated or linked, as appropriate.

If you would like further information about OTC's efforts on airports and aviation emission reduction strategies activities, do not hesitate to call me at 202-508-3840.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bruce S. Carhart", with a long horizontal flourish extending to the right.

Bruce S. Carhart
Executive Director

Attachment

cc: All OTC Members
Robert Brenner, EPA
Carl Burleson, FAA
Paul Dykeman, FAA
Margo Oge, EPA
Donald Zinger, EPA

**OZONE TRANSPORT COMMISSION
STATEMENT OF PRINCIPLES REGARDING EMISSIONS FROM
AIRPORTS AND AVIATION ACTIVITIES**

WHEREAS airports and aviation activities result in emissions of the ozone-causing pollutants nitrogen oxides (NO_x), volatile organic compounds (VOC), and carbon monoxide (CO), as well as other pollutants; and

WHEREAS airport and aviation NO_x emissions have been growing over the past decades, and will become larger emission sources within the Ozone Transport Region (OTR) in the future as airports expand operations to meet consumer and commercial demand; and

WHEREAS there are many levels of government that are responsible for controlling airport and aviation emissions, and there are many types of airport and aviation sources whose emissions and growth in emissions must be addressed; and

WHEREAS States are responsible for ensuring that health-based air quality standards are met, and that air quality is not eroded by increases in emissions that are concomitant with economic growth; and

WHEREAS there is increased pressure on airport authorities to protect local communities from air and noise pollution and traffic congestion, and greater environmental impacts are being shifted to smaller regional airports as they expand to meet demand; and

WHEREAS there is a common interest among States, airport authorities, airlines, and local communities to reduce pollution from airports and aviation activities; and

WHEREAS there are opportunities for local and State authorities to ensure that emissions from growth at airports is minimized through programs such as environmental impact reviews, general conformity, transportation conformity, local zoning programs, and voluntary agreements; and

WHEREAS the U.S. Federal Aviation Administration and the U.S. Environmental Protection Agency have embarked on a public process (the FAA/EPA stakeholder process) to develop a national airport and aviation emission reduction strategy;

THEREFORE, BE IT RESOLVED that the OTC States will promote actions to ensure that airport and aviation emissions are mitigated to the extent possible and reduced into the future; and

FURTHERMORE, that the OTC States will use the attached set of principles to assess the adequacy of existing and potential national, regional, State-specific, and local airport and aviation emission reduction strategies, including the progress and products of the FAA/EPA stakeholder process; and

FURTHERMORE, that the OTC States will continue to collect data on successful and planned emission reduction strategies at airports, and plans to consider all available strategy options at the 2002 OTC Winter Meeting.

STATEMENT OF PRINCIPLES REGARDING EMISSIONS FROM AIRPORTS AND AVIATION ACTIVITIES

ENSURE NO_x REDUCTIONS AND DEVELOP A MULTI-POLLUTANT STRATEGY

Airport and aviation emissions control strategies must result in NO_x reductions, and should foster reductions in other pollutants, including air toxics, in a way that does not create environmental justice issues or additional noise problems as a result of actions taken to reduce such pollutants. Strategies should be developed with consideration of multi-pollutant and multi-media impacts.

ENCOURAGE TIMETABLES CONSISTENT WITH STATE AND FEDERAL REQUIREMENTS

National, regional, state, and local emission reduction strategies should take into consideration and incorporate federal, state and local requirements and emission reductions timetables. They should assist States in meeting State Implementation Plan emissions budgets and attainment deadlines.

PROMOTE THE ROLE OF INCENTIVES AND MARKET FORCES

The use of market forces and incentives is an essential tool for providing flexibility to each airport authority and to airlines in order to reduce emissions in the most cost effective way.

PROMOTE NEW AIRCRAFT ENGINE STANDARDS AND RETROFIT PROGRAMS

Appropriate agencies should set new aircraft engine standards and establish requirements and incentives for retrofitting and replacing older equipment. Technology forcing approaches must be used when setting standards and incentives for new engines. Overall fleet reductions goals and standards must be adopted. Support should be given towards ensuring that research and development funding is secured for new aircraft engine technology.

PROMOTE GROUND SERVICE EQUIPMENT REPLACEMENT AND RETROFIT PROGRAMS AND STANDARDS

Requirements and incentives for retrofitting and replacing older ground service equipment should be established. Best available control technologies when creating incentives for older equipment must be used. Overall fleet reductions goals and standards must be adopted, with standards approaching those currently being considered by California and other States, including requirements for the use of advanced technology engines. Adoption and introduction in a timely manner of the non-road standards that govern ground service equipment must be ensured, including an accelerated schedule for protective Tier IV emission standards for off-road engines.

EMPHASIZE REGIONAL AND NATIONAL APPROACHES

Since ozone precursor emissions from airports can be transported within and across the Ozone Transport Region, at minimum, regional standards should be established. Similar standards should be set for attainment and nonattainment areas, nationally. Initially, investments should be focused in non-attainment areas and, in future, should extend to attainment areas. There must be no degradation of air quality resulting from the transfer of older, higher emitting equipment from one area to another. Air quality improvements at large major airports should not be at the expense of smaller regional airports.

ENSURE FLEXIBILITY FOR STATE, LOCAL AND AIRPORT AUTHORITY EMISSION REDUCTIONS WITHIN A NATIONAL FRAMEWORK

Approaches to reducing emissions from airports must be responsive to State and local needs. Because airport authorities are held accountable for emissions impacts from airport operations as a whole, any national or regional approach must not prohibit airport authorities from negotiating and implementing agreements to achieve additional local emission reductions. Furthermore, the adoption of any national or regional approach must not prohibit the participation of any airport stakeholder in reducing emissions locally or otherwise furthering any such agreements.