

CITY OF CAMBRIDGE

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EXECUTIVE DEPARTMENT

ROBERT W. HEALY

City Manager

RICHARD C. ROSSI

Deputy City Manager

September 11, 1995

To The Honorable, The City Council:

In response to Awaiting Report Item No. 8, regarding an update on the Clean Air Act and Awaiting Report Item No. 12, regarding providing relief from the parking freeze for businesses in Cambridge, please be advised of the following:

Federal Clean Air Act Compliance

In 1990, Congress passed the federal Clean Air Act Amendments (CAAA). The CAAA establishes requirements for achieving National Ambient Air Quality Standards (NAAQS) for a number of pollutants. Dates for compliance with the standards are determined by the severity of exceedance in a particular region. The CAAA requires that states that exceed the NAAQS develop and implement programs to reduce air pollution from stationary and mobile emissions sources. The air quality designation for ozone* levels in Massachusetts is "serious," thus requiring the state to take measures to comply with the standard by 1999. Each subject state must update its State Implementation Plan (SIP) to include enforceable programs and measures that may be included in the Federal Implementation Plan (FIP) issued by the Environmental Protection Agency (EPA). The CAAA required filing of the updated Massachusetts SIP by November 15, 1993; however, this was not achieved, and an extension allowed filing until November 15, 1994. There are still elements of the state SIP which are incomplete and must be submitted to EPA by November 15, 1995.

Although deadlines for filing of documents have been extended, Massachusetts is still required to meet the standards outlined in the CAAA. These entail compliance with the NAAQS for ozone by 1999 by implementing measures to reduce emissions of ozone precursors by 15% by 1996 and 3% annually until 1999 (for a total reduction of 24% below 1990 ozone levels). As a result, the SIP update filed in 1994 instead of 1993 (the original deadline) was required to include measures for achieving the 15% reduction by 1996 as well as the annual 3% reductions.

*

While ozone can be measured in the air in and around urban areas, it is not emitted directly from the tailpipe of vehicles. Rather, some of the emissions from vehicles are known as "ozone precursors," since the combination of the pollutants and direct sunlight cause a chemical reaction whereby ozone is formed at ground level. Ground-level ozone should not be confused with stratospheric ozone which serves to shield the earth from ultraviolet radiation emitted from the sun.

States are also required to provide EPA with an "attainment demonstration" to illustrate the effectiveness of their SIP programs in meeting the requirements of the CAAA. In addition, a state may revise, replace or delete existing SIP programs as long as the air quality benefits of the existing programs are met or exceeded by the new programs. As with new components of the SIP, proposed amendments to the SIP are provided for public review and comment prior to adoption or implementation.

Replacement of the Parking Freeze

As you know, the City filed a proposed amendment to the SIP with both the Massachusetts Department of Environmental Protection (DEP) and the Metropolitan Planning Organization (MPO) in October 1992. The proposed SIP amendment would replace the Cambridge parking freeze with a broad program of measures designed to reduce emissions in the region, particularly those associated with single occupancy motor vehicle (SOVs). These measures expanded and enhanced the measures that the city is implementing under the Vehicle Trip Reduction Ordinance (VTRO), enacted by the City Council in June 1992. Neither the DEP nor the MPO has taken formal action on the proposal to date. In the interim, the City has been working with the DEP to advance consideration of the proposed amendment. We have also been actively participating in the efforts undertaken by the state environmental and transportation secretariats to further define and develop consensus on all of the state's potential revisions to the SIP.

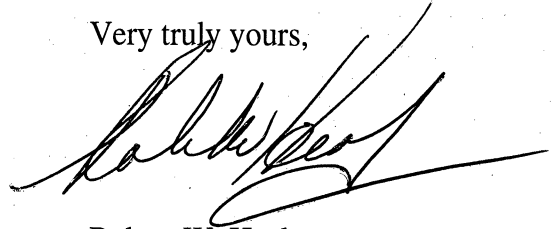
Since vehicles are a significant source of air pollutants in urban areas, an important focus of the SIP is reducing the use of single occupancy vehicles. In those areas not in compliance with the ozone standard, demonstration of a reduction in annual vehicle miles traveled (VMT) is required by 1996, six years from enactment of the CAAA. VMT is a measurement of the total number of miles traveled by vehicles in a particular area or region. This figure is used to assess the potential air quality impacts associated with mobile sources.

A prominent component of the City's SIP amendment is an employer trip reduction program that would substantially expand on the state's existing Rideshare Regulation. The Rideshare Regulation requires employers with more than 250 employees to implement measures to reduce the number of employees driving to work alone. Success of these efforts to reduce automobile commuting trips is important to the state in achieving the reduction in VMT, and thus mobile source emissions, as required by the CAAA. Some of the required measures include selling transit passes on-site and providing transit schedule information. The Rideshare Regulation was passed in the late 1970s but has not been enforced by DEP to date. Recently, however, DEP held a briefing session to inform major employers in the region of planned enforcement of the existing regulation. Employers are required to survey their employees regarding travel modes and provide survey information to DEP. An initial filing is required by November 1995.

In the meantime, DEP has submitted other air pollution control proposals for EPA review according to the CAAA requirements. At the time of its most recent filing in November 1994, DEP committed in writing to take action on our proposal this year. Such action entails putting out a proposed new rule which would replace the parking freeze and soliciting public comment. DEP would then submit the proposed new rule and the rescission of the freeze to EPA as a modification of the transportation element of the SIP.

DEP's intended schedule for moving forward with our proposal was delayed as a result of the departure earlier this year of the director of its air quality programs. Despite this set back, DEP has indicated it still expects to put out the proposal for public hearing in the near future. In June, City staff again met with DEP to review the technical details of our proposal and outline next steps. We are currently awaiting further word from DEP as to the projected schedule for public review. I will keep you informed of further progress in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert W. Healy", with a long, sweeping horizontal line extending to the right.

Robert W. Healy
City Manager

Consent Agenda Item Number 20

S-292
Response to Awaiting Report Item Number
Eight regarding an update on the Clean
Air Act and Awaiting Report Item Number
Twelve regarding providing relief from the
parking freeze for businesses in Cambridge.

*#8 - for original
See 1995 City Manager
Requests #8
Rep #12 - for original
See 1995 City Manager
Requests #56
~~#8 referred~~
#8 & 11 of 9/18/95 - Ref to the
Environment Comm.*

In City Council,

Sept. 11, 1995

*Charter Right
exercised by
Councillor Yodney
9/20/95 - copy sent to
Environment Comm. (d)*