



Air Improvement Resources Committee

8700 Tesoro Drive, Suite 700 San Antonio, Texas 78217 (210) 362-5200 fax 225-5937

March 2, 2011

Hon. Diana Bautista
Chair
AIR Executive Committee
Atascosa County
Judge

Hon. Nelson Wolff
Vice-Chair
AIR Executive Committee
Bexar County
Judge

Hon. Gaylan Schroeder
AACOG Board of Directors
Kendall County
Judge

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City of San Antonio
Councilman

Hon. Marvin Quinney
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Judge

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Council of Cities
City of Universal City
Mayor

Hon. Bruce Boyer
City of New Braunfels
Mayor

Hon. Bill Weeper
MPO
City of Selma
Councilman

Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
NW Washington, DC 20460

03-07-2011 RCVD

Subject: EPA's assessment of the ramifications of using subpart 1 in comparison to subpart 2 to implement a revised ozone NAAQS.

Dear Administrator Jackson:

We, the members of the Air Improvement Resources Committee of the Alamo Area Council of Governments (AACOG), are writing to express our interest in the idea that EPA provide an analysis of the relative value, including both positive and negative assessments as relevant, regarding the use of subpart 1 or subpart 2 in implementation of a revised ozone standard.

We are interested in understanding EPA's assessment of the ramifications of using subpart 1 to implement a revised ozone NAAQS. Historically, EPA has implemented the 8-hour Ozone Standard using Subpart 2. However, EPA has indicated that subpart 1 might be a more effective and less costly option for attaining the NAAQS, as illustrated in the "Final Rule To Implement the 8-Hour Ozone National Ambient Air Quality Standard—Phase 1," published on April 30, 2004:

"An area might be able to achieve greater air quality improvement at less cost from local NOx reductions than from local volatile organic compounds (VOC) reductions of 15 percent mandated for certain subpart 2 areas. This will enable some areas to meet the 8-Hour NAAQS at less cost than under the other classification options... Subpart 2 does not allow EPA and the States to consider transported pollution in determining the feasibility and benefits of mandated controls or in determining the appropriate attainment date for the area" (69 FR 23958).

The Air Improvement Resources Committee of AACOG seeks to determine the most prudent path available to our region. It is important to have meaningful options available to us in our planning process as we work together with the US Environmental Protection Agency and the Texas Commission on Environmental Quality to ensure excellent air quality for our citizens with the least local cost and

Signed,


Chair, AIR Executive Committee


Vice-Chair, AIR Executive Committee