

US EPA ARCHIVE DOCUMENT



JUL 31 2012

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The Honorable Lisa P. Jackson

Administrator

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW

Washington, DC 20460

Dear Administrator Jackson:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the US EPA on a wide range of issues of interest and concern to local governments. More specifically, the Committee is grateful to have the opportunity to comment on the Proposed National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM). The LGAC has reviewed and considered the proposed changes. Pursuant to the Committee's charter, we offer the following comments regarding the primary and secondary NAAQS for PM.

The LGAC recognizes the importance of regulating PM standards in order to provide increased protection against health effects associated with long- and short-term exposures. The LGAC supports strengthening the air quality standard for fine particles (PM_{2.5}) by lowering the primary annual standard from 15 micrograms per cubic meter to a range of 12 – 13 micrograms per cubic meter. This tightening will protect public health and help prevent a variety of significant health problems. Retaining the existing 24-hour standard of PM_{2.5} is reasonable.

The LGAC appreciates EPA's proposal to maintain the standard for coarse particles (PM₁₀) at the current level. Strengthening the PM₁₀ standard would likely have particularly large effects, economic and otherwise, on rural and agricultural areas and counties.

Secondary standards for PM are vital; particle pollution harms public welfare, causing haze in cities and our nation's most treasured national parks, contributing to acid rain formation, and contributing to cloud formation and influencing rainfall patterns. EPA's proposed 24-hour secondary standard for PM_{2.5} will help protect visibility in urban areas and reduce regional haze.

The LGAC appreciates that the proposed revisions to PM_{2.5} monitoring standards are relatively low-cost and do not propose increasing the size of the PM_{2.5} monitoring network. Each urban area that does not already have near-

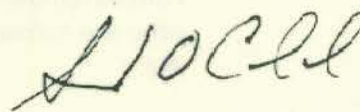
roadway PM2.5 monitoring in place would be able to relocate their existing monitors, rather than having to acquire and install new PM2.5 monitors. This is a cost-effective approach to monitoring PM2.5 near heavily traveled roads in urban areas, where pollution can be higher as a result of automobile emissions. Additionally, by providing a grandfather provision for pending Prevention of Significant Deterioration (PSD) permits, local economies can avoid being stalled or slowed down by having to start the permit process anew. Finally, the LGAC understands that recent Clean Air Act rules, such as rules to reduce pollution from power plants, clean diesel rules for vehicles, and rules to reduce pollution from stationary diesel engines, will help areas meet the proposed PM standards by dramatically cutting pollution both regionally and across the country. The combination of these rules creates a synergy whereby localities will be able to reduce pollution more efficiently and effectively than implementing piece-by-piece regulations. As a result, nearly all U.S. counties will meet the revised PM2.5 annual standard by 2020.

Improving air quality is a partnership between federal, state, and local governments and tribes. Local governments appreciate the opportunity to work with states and EPA in determining non-attainment areas. The implementation of any rule or guidance is most successful when done in a partnership with EPA and the localities, and this partnership appears to be a goal for the Agency and the PM plan. The LGAC looks forward to continued involvement and input as EPA considers revisions to the NAAQS for PM.

Sincerely,



Mayor Heather McTeer
Chair, LGAC



Supervisor Salud Carbajal
Chair, Air, Climate & Energy Workgroup