



DEC 18 2013

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The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the U.S. Environmental Protection Agency on a wide range of issues of interest and concern to local governments. Over the past few years, the LGAC has submitted numerous letters to previous Administrator Lisa P. Jackson on ozone and Particulate Matter (PM) standards, and we are happy to continue the conversation with you as we move forward to protect human health and our environment.

We applaud EPA's Advance Programs for Ozone and PM and the programs' focus on voluntary collaboration between the EPA, states, tribes, and local governments. In a January 2012 letter, the LGAC commended the EPA for announcing the development of a new program modeled after 2006's *Ozone Flex*, with the aim of allowing states and local governments greater flexibility in the steps they take to meet the 2008 ozone standards. We now welcome the timely April 2012 announcement of the Ozone Advance Program, as well as the PM Advance Program launched in January 2013, and we especially appreciate that EPA took the LGAC's advice and expanded the programs to local governments as well as states. Both programs provide a means for local governments to take the initiative in maintaining the ozone and PM National Ambient Air Quality Standards, encouraging proactive approaches that provide a buffer against future violations of the standards.

We share EPA's hope that the Ozone and PM Advance Programs will achieve enough early emissions reductions that areas will not be designated as non-compliant under potential new standards. Local governments appreciate EPA's interest in taking proactive, cost-effective steps to protect our environment, rather than reacting with strict regulations and/or fines. By working with EPA on practical regional plans, local governments will be able to align their resources

most effectively to ensure the health of their residents and environment. This is especially important in light of which groups are most vulnerable to PM2.5 and other pollutants.

For example,

- Children are particularly susceptible to negative health consequences due to air pollution, as are the elderly.<sup>1,2</sup>
- Minorities, individuals of lower education achievement, and individuals with lower income are significantly more likely to live within a mile of polluting facility.<sup>3</sup>
- For children, minorities, women and the elderly especially in communities with large health disparities cumulative risks to exposure also play a large role in their response to contaminants and therefore maintaining appropriate and low emissions along with compliance of standards is vitally important to the well-being of these communities (they tend to have more difficulty breathing, cough more, have aggravated asthma and allergies, have chronic bronchitis and are more susceptible to infections)<sup>4</sup>
- Exposure to air pollution from traffic was higher for persons of low socioeconomic position.<sup>5</sup>
- Individuals of lower socioeconomic position had higher levels of exposure to both indoor and outdoor air pollution.<sup>6</sup>
- Long term exposure to traffic pollution (and tobacco smoking) was related to chronic diseases including diabetes, hypertension, atherosclerosis, coronary artery disease, heart failure, and increased cardiovascular risk.<sup>7,8,9</sup>

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<sup>1</sup> Moya J, Bearer C, Etzel R. Children's behavior and physiology and how it affects exposure to environmental contaminants. *Pediatrics*. 2004; 113: 996-1006.

<sup>2</sup> Bateson TF, Schwartz J. Who is sensitive to the effects of particulate air pollution on mortality? A case-crossover analysis of effect modifiers. *Epidemiology*. 2004; 15(2): 143-149.

<sup>3</sup> Mohai P, Lantz PM, Morenoff J, et al. Racial and socioeconomic disparities in residential proximity to polluting industrial facilities: evidence from the Americans' Changing Lives Study. *American Journal of Public Health*. 2009; 99(Supplement 3): S649-S656.

<sup>4</sup> Schwartz, Joel, PhD, David Belinger, Ph.D and Thomas Glass, PhD. Exploring Potential Sources of Differential Vulnerability and Susceptibility in Risk From Environmental Hazards to Expand the Scope of Risk Assessment, *American Journal of Public Health*. 2009; 99(Supplement 3): S94-S101.

<sup>5</sup> Havard S, Deguen S, Zmirou-Navier D, et al. Traffic-related air pollution and socioeconomic status: a spatial autocorrelation study to assess environmental equity on a small-area scale. *Epidemiology*. 2009; 20(2): 223-230.

<sup>6</sup> Baxter LK, Clougherty JE, Laden F, Levy JI. Predictors of concentrations of nitrogen dioxide, fine particulate matter, and particle constituents inside of lower socioeconomic status urban homes. *Journal of Exposure Science and Environmental Epidemiology*. 2007; 17(5): 433-444.

<sup>7</sup> Nawrot TS, Staessen JA, Gardner JP, Aviv A. Telomere length and possible link to X chromosome. *Lancet*. 2004; 363 (9408): 507-510.

<sup>8</sup> Fitzpatrick AL, Kronmal RA, Gardner JP, et al. Leukocyte telomere length and cardiovascular disease in the Cardiovascular Health Study. *American Journal of Epidemiology*. 2007; 165(1): 14-21.

<sup>9</sup> Brouillette SW, Moore JS, McMahon AD, et al. Telomere length, risk of coronary heart disease and statin treatment in the West of Scotland Primary Prevention Study: a nested case-control study. *Lancet*. 2007; 369 (9556): 107-114.

One of the most important components of the Advance Programs is the comprehensive toolbox provided on the website ([epa.gov/ozoneadvance](http://epa.gov/ozoneadvance)). These resources, including guidance, funding opportunities, technical assistance, examples, and webinars, are invaluable tools for local governments. For example, the "Menu of Control Measures: listing of potential emissions reduction measures for direct PM 2.5 and precursors of ozone and PM2.5" provides an eminently practical set of options from which local governments can pick and choose those options that might work best in their area by comparing the control efficiency percentage, cost-effectiveness, and whether additional pollutants are controlled. We appreciate that EPA took the LGAC's January 2012 advice and created a toolbox of technical information to help local governments voluntarily control their emissions.

Improving air quality requires a partnership between federal, state, tribal, and local governments. Local governments appreciate the opportunity to work with states and the EPA in determining the best way to move forward and maintain compliance with air quality standards. The implementation of any rule or program is most successful when done in partnership, and the Advance Program emphasizes and expands on this partnership in a way that can be beneficial to all.

The LGAC looks forward to continued involvement and input as EPA and local governments continue taking steps to protect our human and environmental health.

Sincerely,



Mayor Bob Dixon  
Chair, LGAC



Supervisor Salud Carbajal  
Chair, Air, Climate & Energy Workgroup