



Central Texas Clean Air Coalition

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August 18, 2020

Advance Program

c/o Mr. Rich Damberg
Environmental Protection Agency, OAQPS C539-01
4930 Old Page Road
Durham, NC 27703

Subject: Sign-Up Letter for Particulate Matter Advance

Dear Mr. Damberg:

The Central Texas Clean Air Coalition (CAC) has been participating in EPA's Ozone (O₃) Advance Program on behalf of the Austin-Round Rock-Georgetown Metropolitan Statistical Area (MSA) since 2012. After careful consideration, the CAC has decided to also request to participate in the Particulate Matter (PM) Advance Program on behalf of the MSA. The CAC is a voluntary association of local governments and other stakeholders within the region that was formed in 2002 in affiliation with the Capital Area Council of Governments (CAPCOG), the regional planning commission for Texas State Planning Region 12. The Austin-Round Rock-Georgetown MSA meets all of EPA's requirements for participation in the PM Advance Program, and we wish to partner with EPA to improve PM Air Pollution in Central Texas.

- 1) The Austin-Round Rock-Georgetown MSA is the Core-Based Statistical Area for the Austin, Texas, Urbanized Area, and consists of Bastrop, Caldwell, Hays, Travis, and Williamson Counties as of the most recent statistical area delineations issued by the Office of Management and Budget in March 2020.
- 2) As shown in 40 CFR §81.344, all five counties in the Austin-Round Rock-Georgetown MSA are designated "unclassifiable/attainment" for all fine particulate matter (PM_{2.5}) National Ambient Air Quality Standards (NAAQS).
- 3) There are two "regulatory" PM_{2.5} monitoring stations operated by the Texas Commission on Environmental Quality (TCEQ) that are used to meet EPA's PM_{2.5} monitoring requirements for the MSA: Austin Webberville Rd. (AQS site number 484530021) and Austin North Interstate 35 (AQS site number 484531068). The Austin Webberville Rd. site has the region's highest 2017-2019 design values for both the annual and 24-hour PM_{2.5} NAAQS at 9.8 µg/m³ and 23 µg/m³, respectively.
- 4) The state's submissions to EPA for the Air Emissions Reporting Rule (AERR) fulfill the region's emissions inventory reporting requirements.

While our region's existing 2019-2023 Regional Air Quality Plan includes a number of measures that help reduce PM_{2.5} air pollution within our region, these measures have been targeted primarily at O₃ season daily nitrogen oxides (NO_x) emissions to reduce peak 8-hour O₃ concentrations. It is our intent over the next year to revise this plan to more directly address annual and 24-hour PM_{2.5} concentrations as well.

In seeking to participate in the PM Advance Program, we are mindful of increases in PM_{2.5} design values in the region in recent years and EPA staff's statements in the January 2020 *Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter* that, "health effects can occur over the entire distribution of ambient PM_{2.5} concentrations evaluated, and epidemiological studies do not identify a population-level threshold below which it can be concluded with confidence that PM-associated health effects do not occur," and "when taken together, we reach the conclusion that the available scientific evidence, air quality analyses, and the risk assessment...can reasonably be viewed as calling into question the adequacy of the public health protection afforded by the combination of the current annual and 24-hour primary PM_{2.5} standards." We are also particularly mindful of the fact that the region's current annual PM_{2.5} design value exceeds some of the levels that EPA staff had proposed that the Administrator consider for alternative annual PM_{2.5} NAAQS.

We expect that our participation in the PM Advance Program will benefit the Austin-Round Rock-Georgetown MSA by:

- Reducing PM_{2.5} and other types of air pollution;
- Maintaining compliance with the current PM_{2.5} NAAQS and any potentially more stringent PM_{2.5} NAAQS that EPA may adopt in the future;
- Increasing public awareness about PM air pollution; and
- Targeting limited resources toward actions to address PM problems quickly.

If you have any questions, please contact CAPCOG Director of Regional Planning and Services, Andrew Hoekzema, at ahoekzema@capcog.org or (512) 916-6043.

Sincerely,

A handwritten signature in cursive script that reads "Jane Hughson".

City of San Marcos Mayor Jane Hughson
Chair, Central Texas Clean Air Coalition

CC:

Carrie Paige, EPA Region 6

Denine Calvin, TCEQ State Implementation Plan (SIP) Team