



Serving local governments in Muscatine and Scott Counties, Iowa;  
Henry, Mercer and Rock Island Counties, Illinois.

March 14, 2014

## Air Docket

Attention Docket ID No. EPA-HQ-OAR-2008-0699

Environmental Protection Agency

Mail Code: 6102T

1200 Pennsylvania Avenue, NW

Washington, DC 20460

As a coalition of local government representatives committed to clean air and the protection of the health of our citizens, we appreciate the opportunity to comment on the proposed reduction of the 2008 National Ambient Air Quality Standard. Following are our shared comments to Docket ID No. EPA-HQ-OAR-2008-0699.

The coalition has been tracking ozone levels in Muscatine and Scott Counties, Iowa and Rock Island County, Illinois, through our respective state agencies and we have been very active in establishing programs to reduce ozone levels in the Bi-State Region. In fact, we launched an area-wide pledge program to commit to projects and activities that improve air quality in 2010. The Bi-State Region supports an ozone standard that protects human health and the environment.

The Environmental Protection Agency ("EPA") is undertaking a reconsideration of the 2008 National Ambient Air Quality Standard ("NAAQS") for ozone in the range of 0.070 to 0.060 parts per million ("ppm"). EPA's proposed range would result in a large portion of the U.S. classified as nonattainment. Lowering the 0.075 ppm standard to the lower end of the proposed range of 0.060 ppm would result in almost tripling the number of counties being designated in non-attainment in the United States. The National Association of Counties (NACO) has determined that 96 and 76 percent of current monitors would fail at the 0.060 and 0.070 ppm standards, respectively (compared to 48 percent at the 0.075 ppm standard). All monitored areas in Iowa and Illinois would be classified as non-attainment if the 0.060 ppm standard were adopted. All but six of the 51 monitors in Iowa and Illinois would be in non-attainment at a standard of 0.065 ppm.

Further, very few of the total U.S. counties are monitored. Only areas without monitors, smaller urban and rural areas, would be able to attract businesses and industries. This outflow of industry from large and mid-sized urban areas would be counter to smart growth and sustainability implementation strategies. The existence of monitors themselves should not create a system of advantaged and disadvantaged communities, counties and states. The change in the threshold would impose new and more costly standards on local businesses at a time of recession and historic unemployment nationwide.

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Air emission reductions are already occurring without a new standard and the 2008 ozone standard programs for ozone reduction have yet to be fully implemented. EPA designed national programs that, when fully implemented, will achieve significant reductions in air emissions through cleaner fuels and vehicles. In the U.S., significant progress has been made in reducing ozone levels and improving air quality in general. Between 1980 and 2012, total emissions in tons of the six principal air pollutants dropped by over 65 percent and measured ambient concentrations of ozone dropped 25% since 1980 (see <http://www.epa.gov/airtrends/aqtrends.html>).

In addition, EPA's Clean Air Scientific Advisory Committee recognized that a new tighter standard poses issues for attainability. The proposed lower standards come close to background ozone levels, and natural precursors may prevent attainment. Availability of technology to meet the new standard has also been questioned. EPA's Regulatory Impact Analysis found only a small portion of the costs of attainment are associated with known controls and "the rest of the controls would be associated with "other, currently unknown technologies.""

We believe there should be further evaluation of biogenic sources of ozone and its precursors to determine the impact of plant growth and crop seasons on ozone levels. Agricultural fields in very rural areas are reading in non-attainment. Since we in the Midwest are seen as the one of the world's greatest sources of food, the very nature of our important agricultural role may contribute to background ozone levels to a degree in which our region and our states cannot remain in attainment and produce these essential foodstuffs.

We request the ozone NAAQS be lowered no more than 70 ppm to allow programs established under the prior standard time to work. In addition, the policies, procedures and rules should be reviewed and adjusted to reflect current knowledge and implementation realities. Finally, biogenic sources of ozone should be studied to understand background ozone levels in agricultural areas.


The Bi-State Region will continue to educate the public and encourage voluntary measures of local governments, businesses and individuals to improve air quality, similar to efforts that have been established over the past 10 years for ozone through the Quad City Air Quality Task Force. Activities have included: "Aware of air" brochure development and dissemination, alternative fuels workshop, teacher training workshop, travel demand management information, newspaper advertisements, the development of a voluntary ozone flex plan, CNG buses and biodiesel buses; trip chaining television advertisements; public and private employer outreach projects and meetings; truck engine idling proposals to USEPA; QC Transit web portal development; transit marketing and ambassador program and fair, a "Make Indoor Air Quality Visible" campaign, and the Alcoa "Make an Impact" campaign. An area-wide pledge program to commit to projects and activities that improve air quality was launched in 2010. This issue is of the utmost importance to Muscatine and Scott Counties, Iowa and Rock





Island County, Illinois. The area has been taking steps since 1998 to improve air quality and there is a high level of regional commitment.


This issue is of the utmost importance to Muscatine and Scott Counties, Iowa and Rock Island County, Illinois. Thank you for the opportunity to provide these comments.


Sincerely,


  
Bob Gallagher  
Mayor, City of Bettendorf


  
John Thodos  
Mayor, City of East Moline

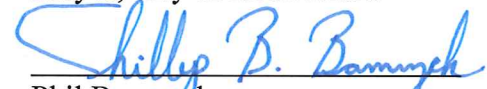
  
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DB/sv  
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cc: Senator Richard Durbin, Senator Charles Grassley, Senator Tom Harkin,  
Senator Mark Kirk, Representative David Loebsack, Representative Cheri  
Bustos