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April 25, 2018

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

RE: Response to the Proposed Designation for the San Antonio – New Braunfels MSA for the 2015 Ozone National Ambient Air Quality Standards: Notice of Availability and Public Comment Period, Docket ID No. EPA-HQ-OAR-2017-0548

Dear Administrator Pruitt,

The Alamo Area Council of Governments (AACOG) Board of Directors appreciates the opportunity to comment on the Environmental Protection Agency's Proposed Designation for the San Antonio – New Braunfels MSA for the 2015 Ozone National Ambient Air Quality Standards.

The Alamo Area Council of Governments was established in 1967 as a political subdivision of the State of Texas, under Chapter 391 of the Local Government Code. AACOG is a voluntary association of local governments and organizations that serves its members through planning, information, and coordination activities. AACOG serves State Planning Region 18, covering Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, Medina, McMullen and Wilson counties. The AACOG Board of Directors (BOD) is the governing body for the agency.

On March 30, 2018, the EPA proposed the area designations for the eight counties that comprise the San Antonio – New Braunfels MSA. AACOG would like to express support for EPA's intended "Attainment/Unclassifiable" designations of the seven outlying counties of the San Antonio – New Braunfels MSA: Atascosa, Bandera, Comal, Guadalupe, Kendall, Medina, and Wilson Counties. These intended designations are consistent with recommendations made by the State of Texas. AACOG also agrees with the justification of the EPA's intended designations of the seven aforementioned counties, as outlined in the Technical Support Document.

In that same letter, the EPA expressed its intent to modify the State of Texas's recommendation of "Attainment" for Bexar County. The intended designation was that "all or portions of Bexar County [be designated] as, at best, Unclassifiable." AACOG believes that such a vaguely-worded intended designation makes it difficult to provide a cogent and convincing argument either in support of or against the intended

designation. Thus, AACOG encourages the EPA to adhere to the State of Texas’s recommendation for Bexar County and designate it as “Attainment/Unclassifiable.”

On February 28, 2018, in a letter to the EPA, the State of Texas made the case that international emissions likely contribute over 20 ppb of ozone to 8-hour concentrations at monitors in Bexar County, based on photochemical modeling projections to 2017 that have been approved by the Texas Commission on Environmental Quality (TCEQ). Those modeling projections are provided in Table 1 below.

Table 1: Contribution to Local Ozone in the San Antonio-New Braunfels MSA, Maximum 8-hour Ozone on Days > 60 ppb of Ozone, 2017¹

Region	C23		C58	
	ppb	Percentage	ppb	Percentage
San Antonio-New Braunfels MSA	11.94	20%	12.86	21%
All Other Regions	49.28	80%	49.75	79%
Total	61.22	100%	62.61	100%

Region	C23		C58	
	ppb	Percentage	ppb	Percentage
Boundary and International	23.02	38%	24.05	38%
Texas	22.54	37%	22.93	37%
Other US States	15.66	26%	15.64	25%
Total	61.22	100%	62.61	100%

In its Technical Support Document, the EPA refuted those findings in support of its intended designation for Bexar County. The EPA response to those modeling results is found in the last paragraph on Page 21 of the Technical Support Document. AACOG would like to address some of the EPA’s statements with regard to the impact of international emissions on the San Antonio – New Braunfels MSA.

- EPA: “...it conflates naturally occurring ozone from outside the modeling domain with man-made emissions from outside the modeling domain.”

It is correct that part of the emissions from outside the modeling domain are biogenic emissions, but only a small portion. AACOG’s modeling, also approved by TCEQ, shows that anthropogenic emissions are the most significant contributor to high ozone in 2023, as shown in Figure 1.

- EPA: “...[‘Boundary conditions/International’] will include ozone that is generated by portions of the US that are outside the modeling domain...”

The only U.S. states included under “Boundary conditions/International” are Alaska and Hawaii, whose contributions to San Antonio’s ozone are minimal. Figure 2 below, which was also included in the

¹ AACOG, March 2018. “International Contribution to Local Ozone in the San Antonio-New Braunfels MSA, 2017 and 2023.” San Antonio, TX. Email correspondence to TCEQ.

February 28 letter to the EPA, shows that much of Mexico, Canada, and parts of the Caribbean are inside the 36 km modeling domain and would not be considered “Boundary conditions/International.”

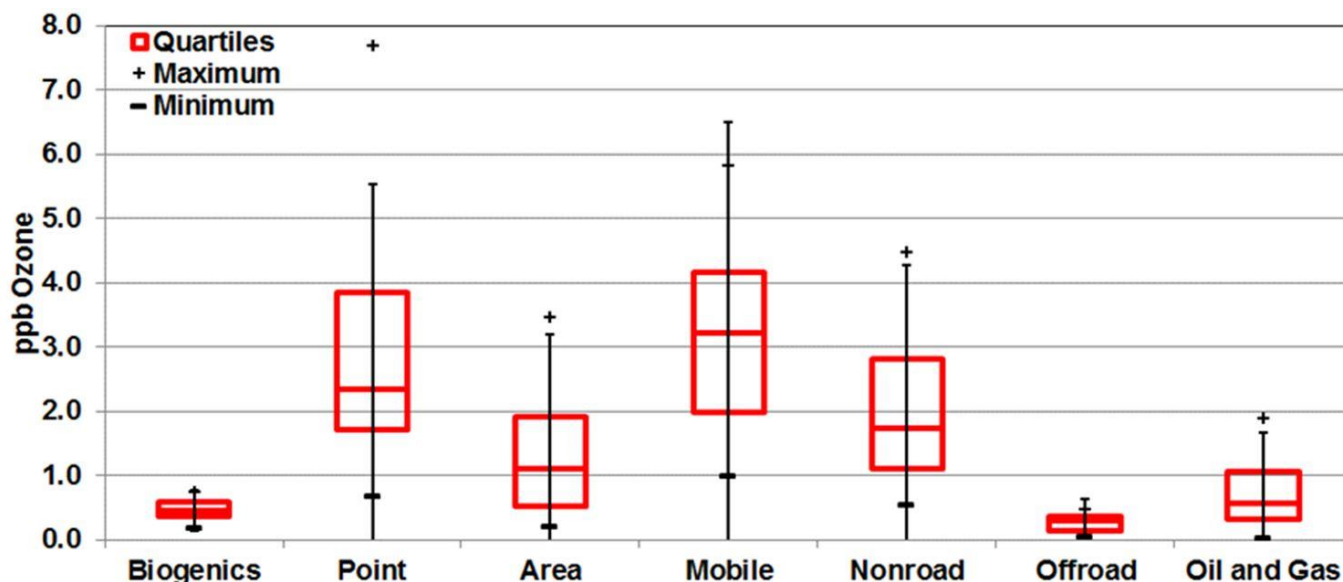


Figure 1: Quartile plots for CAMx 58 for Peak 8 hour Ozone by Emission Group on Days > 60 ppb, 2023²

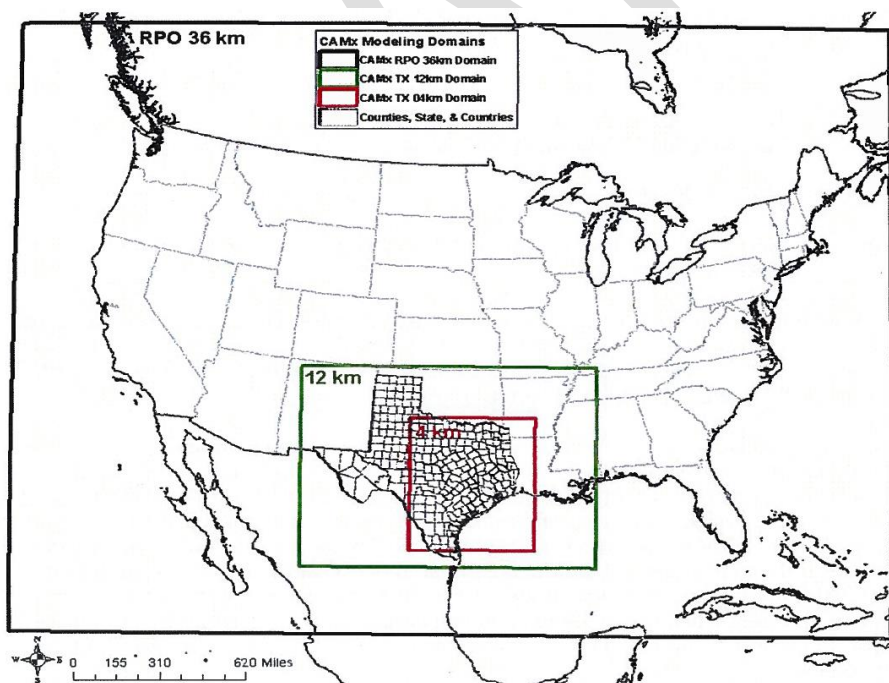


Figure 2: Nested Photochemical Modeling Grids for Ozone Season 2012 Episode³

² Alamo Area Metropolitan Planning Organization (AAMPO), November 2017. “Ozone Analysis of the 2012 Ozone Season Photochemical Modeling Episode.” P. 6-10. San Antonio, TX.

³ TCEQ. “Texas Air Quality Modeling – Domains”. Austin, Texas. Available online: <http://www.tceq.texas.gov/airquality/airmod/rider8/modeling/domain>. Accessed April 6, 2018.

- EPA: “...ozone the [sic] is generated from emissions within the US and recirculated into the domain.”

This could be true, but any U.S. emissions that are recirculated back into the domain are expected to be minimal and would have insignificant impact on ozone in Bexar County.

- EPA: “From the same modeling results a more reasonable estimate of the impacts from manmade emissions from Mexico is on the order of less than 1 ppb (1-2%) of the ozone projected for 2023 in San Antonio.”

AACOG’s modeling corroborates this statement, with Mexico contributing less than 1 ppb to ozone concentrations at CAMS 58 in Bexar County (Figure 3). AACOG’s claim is that up to 20 ppb of ozone comes from international sources outside of the 36 km modeling domain, not just Mexico. Furthermore, prevailing winds during high ozone events typically don’t originate from Mexico, as seen in Figure 4. Contributions from Mexico are only a small component of the overall ozone in Bexar County.

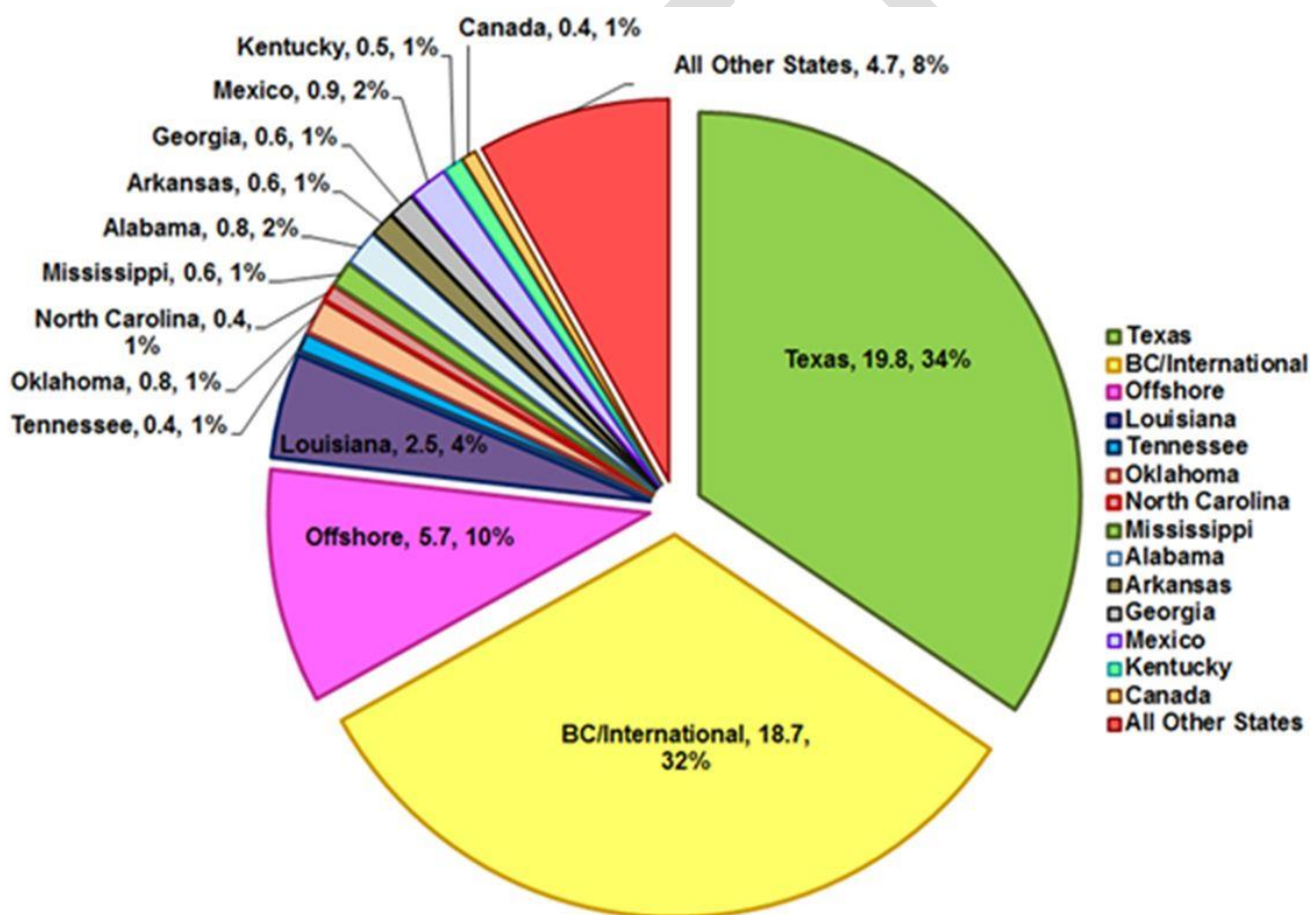


Figure 3: Pie Chart for C58 by Regions for Average 8-hour Ozone on Days > 60 ppb, 2023⁴

⁴ AAMPO, November 2017. “Ozone Analysis of the 2012 Ozone Season Photochemical Modeling Episode.” P. 8-7. San Antonio, TX.

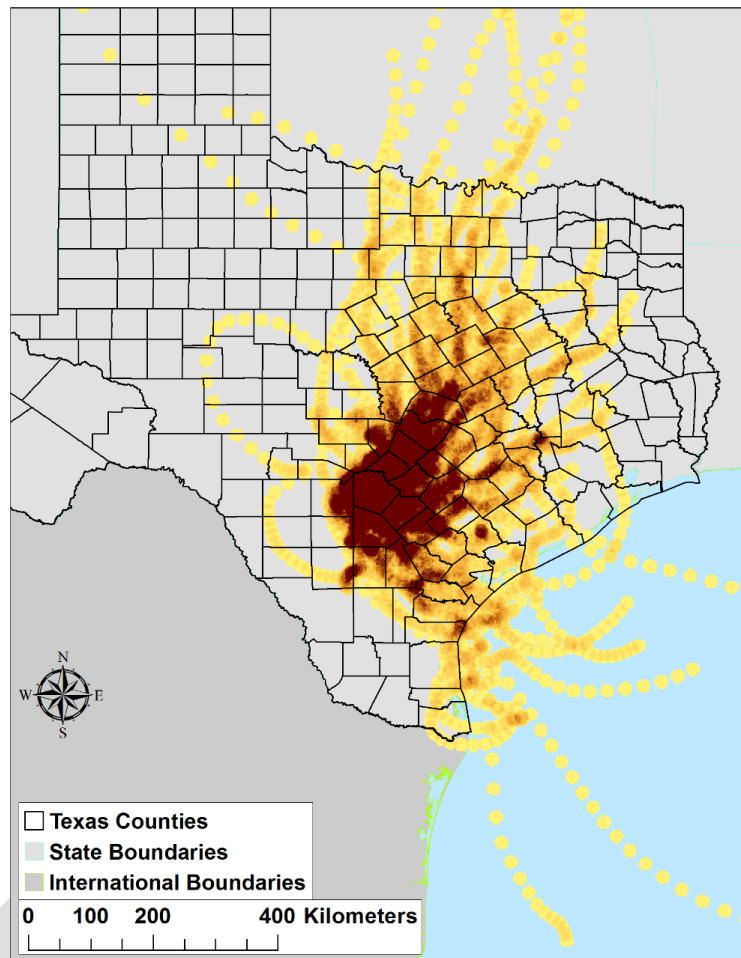


Figure 4: Density of Hourly 48-Hr 100m Back Trajectory Points on Ozone Days > 70 ppb, 2010 – 2016⁵

In addition, the San Antonio – New Braunfels MSA has a long history of being proactive in limiting ozone pollution without being subject to federal regulations associated with nonattainment. A number of local voluntary initiatives have been implemented, frequently with public-private partnerships, which have successfully reduced the region's design value (DV) from a high of 91 ppb in 2004 to 73 ppb in 2016⁶, despite a population increase of over 568,000^{7,8} across the MSA during that time. Some of these initiatives include enacting anti-idling ordinances in Bexar County and the cities of San Antonio and Leon Valley; a decade-long Save For Tomorrow Energy Plan (STEP) from CPS Energy to reduce demand for electricity generated by coal-fired power plants; participating in the

⁵ AACOG, June 2017. "Conceptual Model Ozone Analysis of the San Antonio Region Updates through Year 2016." P. 4-13. San Antonio, TX.

⁶ TCEQ. "Compliance with Eight-Hour Ozone Standard." Austin, TX. Available online: https://www.tceq.texas.gov/cgi-bin/compliance/monops/8hr_attainment.pl. Accessed April 6, 2018.

⁷ U.S. Census Bureau, April 2017. "County Intercensal Tables: 2000-2010." Available online: <https://www2.census.gov/programs-surveys/popest/tables/2000-2010/intercensal/county/co-est00int-01-48.xls>. Accessed April 6, 2018.

⁸ U.S. Census Bureau. American Fact Finder, March 2018. "Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2017 - United States -- Metropolitan Statistical Area; and for Puerto Rico 2017 Population Estimates." Available online: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>. Accessed April 6, 2018.

Texas Emission Reduction Program (TERP) to facilitate turnover of older and dirtier diesel engines; installing selective non-catalytic reduction at cement kilns in Bexar and Comal Counties; and investments in the latest technology by both the energy industry in the Eagle Ford shale and the cement industry to reduce emissions. Thanks to these united efforts to reduce ozone precursors, Bexar County monitors are projected to meet the 2015 ozone NAAQS by 2020 (Figure 5), which is earlier than would be required under a marginal nonattainment classification. Every regulatory monitor in the area is projected to be well below the 2015 standard by 2023.

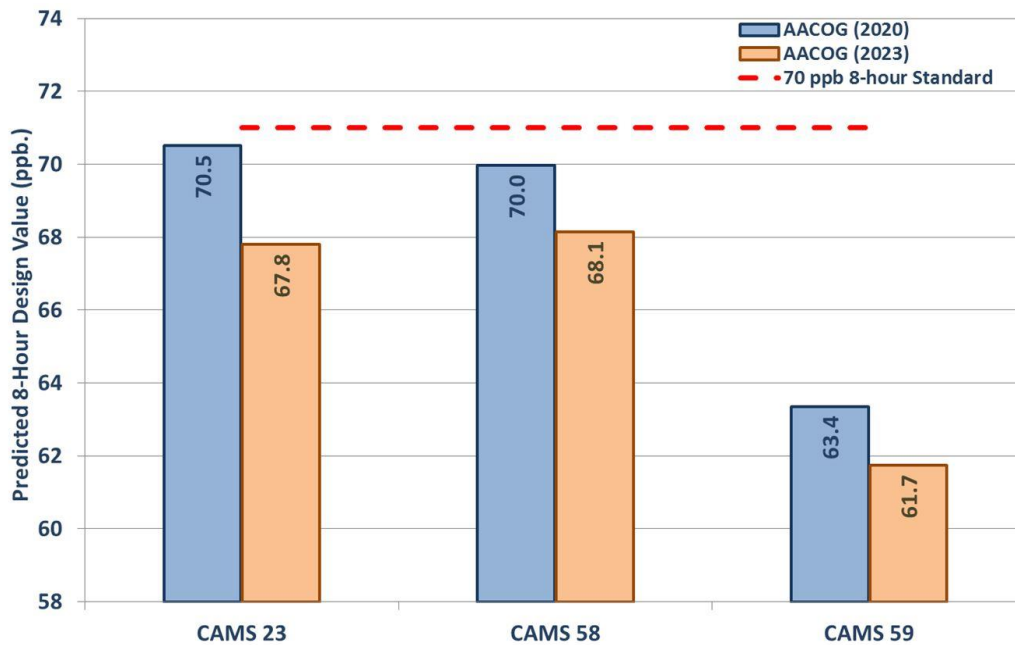


Figure 5: Projected Change in San Antonio-New Braunfels MSA Eight-Hour Design Values with a 2017 Base Line, 2020 and 2023⁹

With photochemical modeling showing Bexar County monitors meeting the ozone standard by 2020, a “nonattainment” designation would place an unnecessary financial and regulatory burden on Bexar County industries, businesses, and citizens. An economic cost analysis commissioned by ACOG early in 2017 revealed that the economic burden associated with marginal nonattainment on Bexar County could top \$20 billion if businesses decide not to expand or relocate within the county due to increased regulation.¹⁰

To summarize, ACOG supports the EPA’s intended designation and justification of “Attainment/Unclassifiable” for the seven outlying counties of the San Antonio – New Braunfels MSA, and urges the EPA to adhere to the State of Texas recommendation of “Attainment/Unclassifiable” for Bexar County due to the impacts of foreign emissions and transport, and the progress that had been made in reducing the area’s design value by nearly 20 ppb in less than 15 years.

⁹ AAMPO, November 2017. “Ozone Analysis of the 2012 Ozone Season Photochemical Modeling Episode.” P. 8-7. San Antonio, TX.

¹⁰ ACOG, February 2017. “Potential Cost of Nonattainment in the San Antonio Metropolitan Area.” P. vi. San Antonio, TX. Available online: <http://www.aacog.com/DocumentCenter/View/41742>. Accessed April 6, 2018.

Please let us know if you have any questions regarding our comments, and we look forward to working with EPA in the future.

Signed,

Chris Schuchart
Medina County Judge
Chair, AACOG Board of Directors

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