



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 City Council of the City of New Braunfels appreciates the opportunity to comment on the Environmental Protection Agency's Response to the Designation Recommendation from Texas for the San Antonio Area for the 2015 Ozone National Ambient Air Quality Standards.

On March 30, 2018, the EPA proposed the area designations for the eight counties that comprise the San Antonio – New Braunfels MSA. The City of New Braunfels would like to express support for the intended "Attainment/Unclassifiable" designations of Comal County and all seven outlying counties of the San Antonio – New Braunfels MSA. These intended designations are consistent with recommendations made by the State of Texas. The City of New Braunfels also agrees with the justification of the EPA's intended designation of Comal County, 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 City of New Braunfels encourages the EPA to adhere to the State of Texas's recommendation for Bexar County and designate it as "Attainment/Unclassifiable."

In addition, the San Antonio – New Braunfels MSA area 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

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the region's design value (DV) from a high of 91 ppb in 2004 to 73 ppb in 2016¹, despite a population increase of over 568,000^{2,3} 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 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 and the cement industry to reduce emissions. Thanks to these united efforts to reduce ozone precursors, San Antonio monitors are projected to meet the 2015 ozone NAAQS by 2020 (Figure 1), which is earlier than would be required under a marginal nonattainment classification.

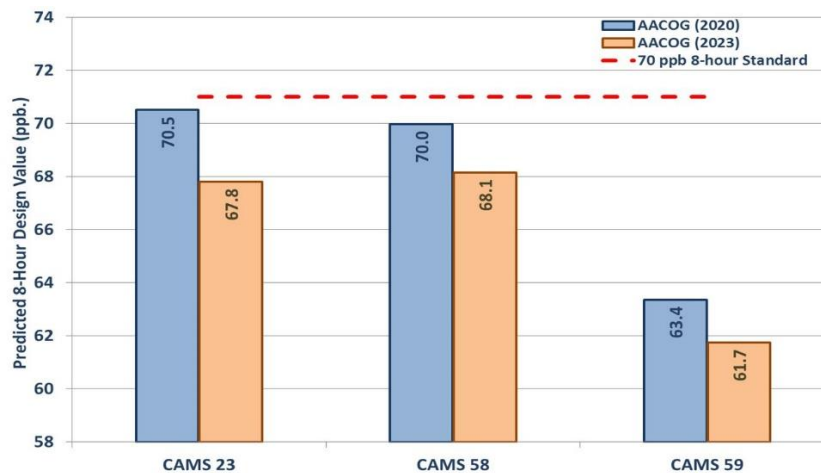


Figure 1: Projected Change in San Antonio-New Braunfels MSA Eight-Hour Design Values with a 2017 Base Line, 2020 and 2023⁴

¹ 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.

² 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.

³ 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.

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



To summarize, the City of New Braunfels City Council supports the EPA's intended designation and justification of "Attainment/Unclassifiable" for Comal County, and urges the EPA to adhere to the State of Texas recommendation of "Attainment/Unclassifiable" for Bexar County and the entire San Antonio – New because of 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.

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

Sincerely,

Barron Casteel, Mayor
City of New Braunfels