

Appendix B

Local Government and Public Comments
Received

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From: [Phil Conrad](#)
To: [Boothe, Laura;](#)
cc: [SVC_DENR.DAQ.publiccomments;](#)
[Connie Cunningham;](#)
Subject: RE: Ozone Non-Attainment Boundary
Date: Tuesday, February 07, 2012 4:47:37 PM

We would like to add the following as an addendum to our comments:

- The total combined population of the rural townships mentioned below, in Cabarrus and Rowan counties is less than 3 percent of the total population of our MPO area.
- Both the Cabarrus County and Rowan County Land Use Plans identify the areas in these rural townships for agriculture and open space use, minimal to no utility expansion, low septic suitability due to poor soils, partial restrictive watershed coverage, and very limited, low density residential growth.
- There are no capacity-adding highway projects to be built thru the Long Range Transportation Plan or the State's Transportation Improvement Program (STIP) for these rural townships in the future.

Thank you again for the opportunity to provide input.

Phil Conrad
Cabarrus-Rowan MPO

From: Phil Conrad [mailto:pconrad@mblsolution.com]
Sent: Thursday, February 02, 2012 11:15 AM
To: 'daq.publiccomments@ncdenr.gov'
Subject: Ozone Non-Attainment Boundary

Ms. Boothe:

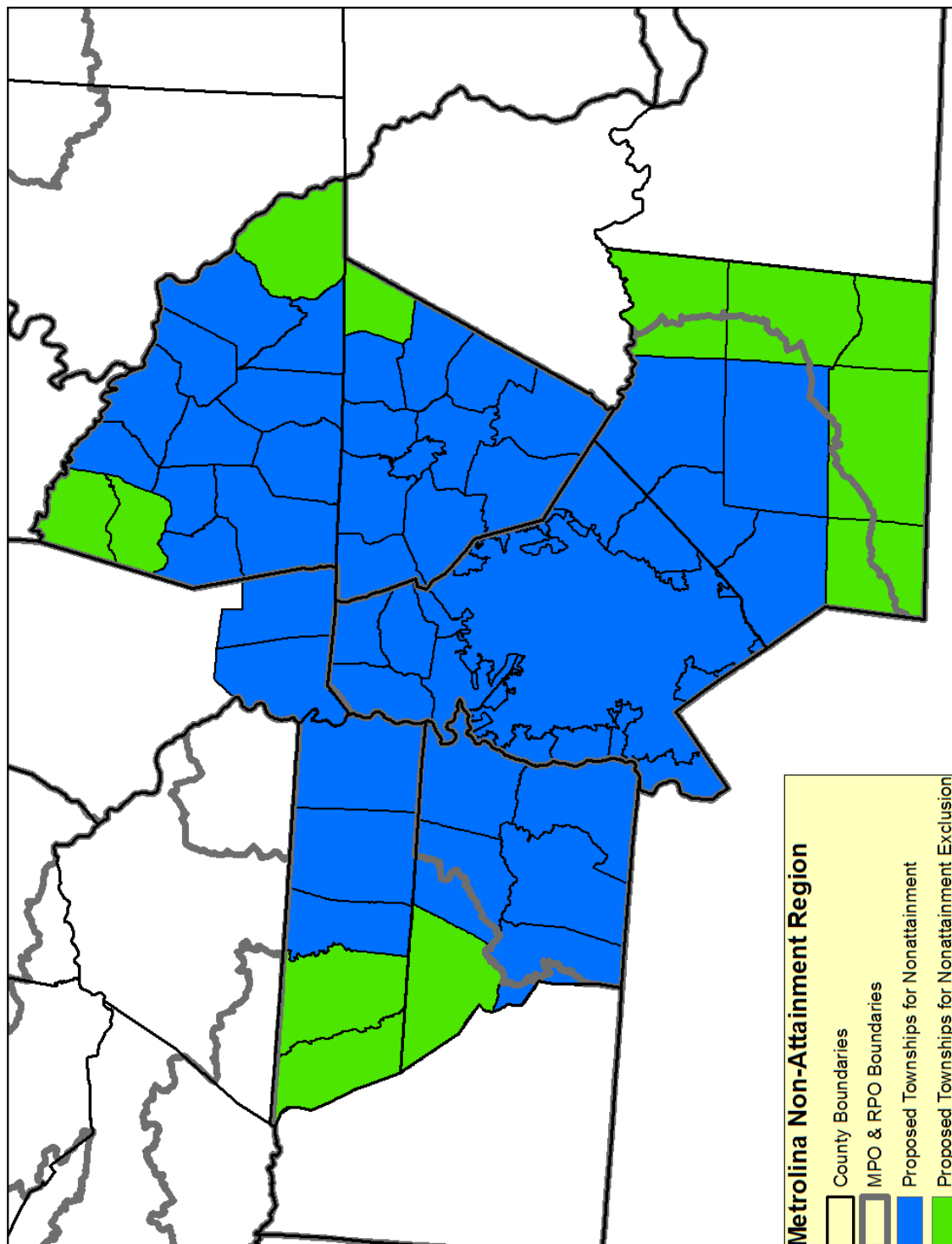
Thank you for the opportunity to comment on the proposed non-attainment boundary for the federal 8 hour ozone standard (.075 ppb). As you know, the Cabarrus-Rowan Transportation Advisory Committee discussed this issue at their January 25th meeting and voted to support the option presented by NC DENR for exempting several rural townships in Cabarrus and Rowan counties from the proposed non-attainment boundary (see attached). We believe these townships should no longer be subject to the non-attainment status and requirements, due to their low density and minimal population growth over the past 10 years, negligible traffic volumes and inter-county commuting, and proximity to attaining monitors in southeastern Rowan and southern Davie counties. We believe these factors qualify these areas for consideration of ozone attainment status.

If you should have any questions regarding our endorsement, please do not hesitate to contact our office.

Sincerely,

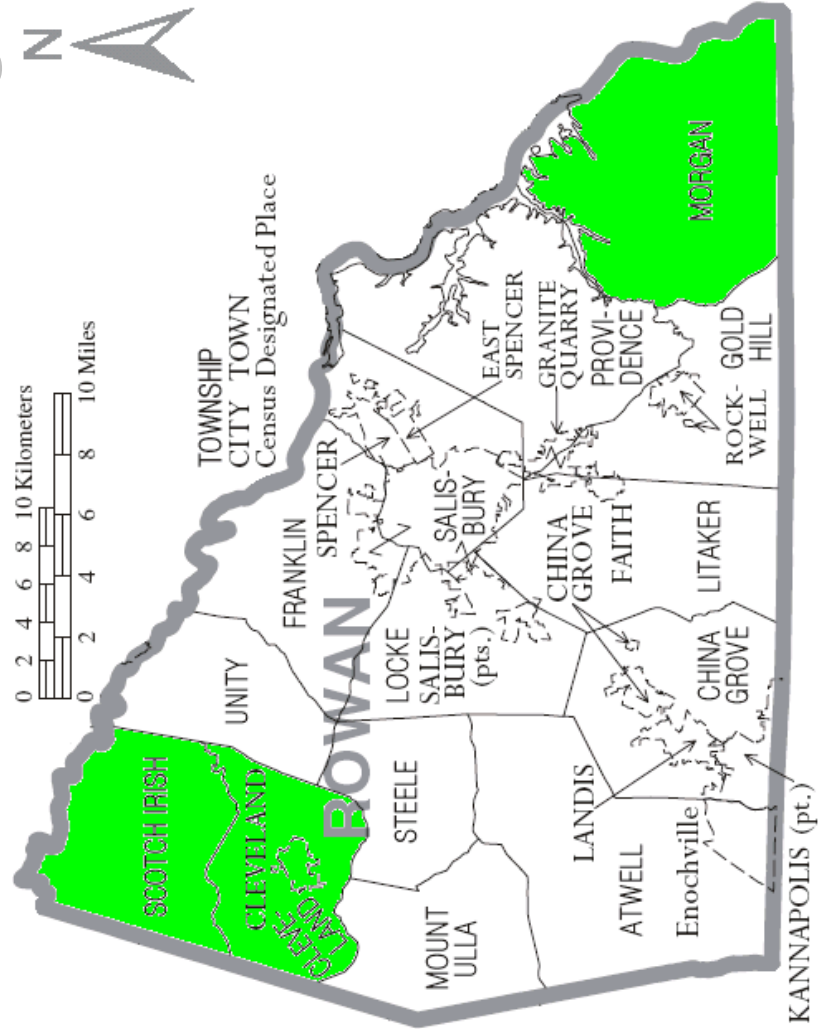
Phil Conrad
Cabarrus-Rowan MPO
135 Cabarrus Avenue East
Concord, North Carolina 28025
704-795-7528
704-795-7529 fax
www.crmmpo.org

Townships Considered for NAA Exclusion



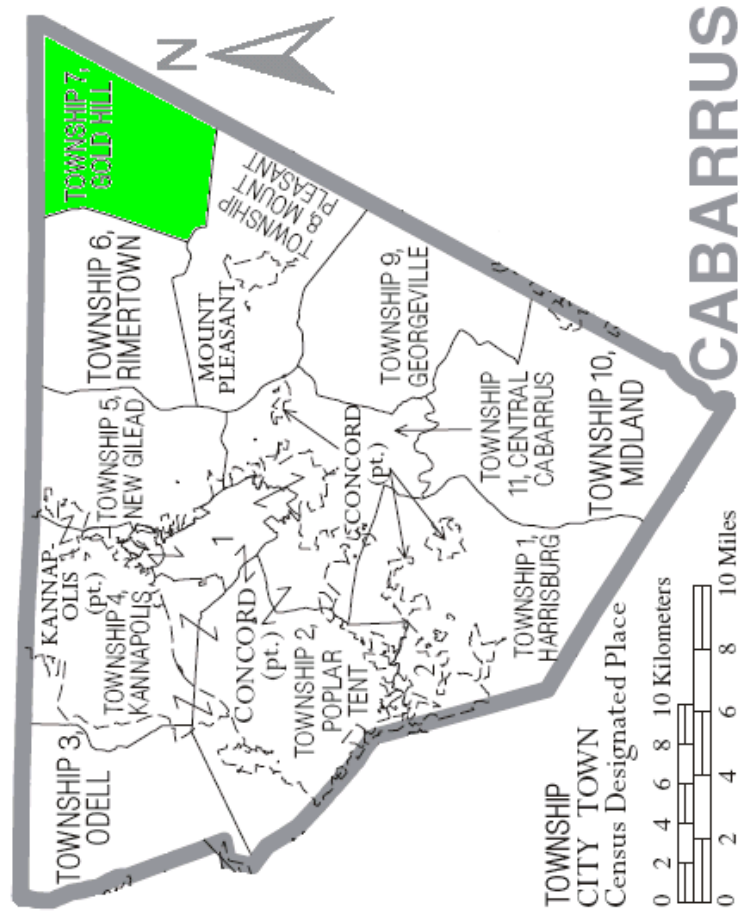
Rowan County

- Scotch Irish, Cleveland, and Morgan townships



Cabarrus County

- Gold Hill township



From: [Joey Raczkowski](#)
To: [SVC_DENR.DAQ.publiccomments;](#)
Subject: Comments from Iredell County Government
Date: Friday, January 20, 2012 5:34:32 PM
Attachments: [Iredell County March 2010.pdf](#)

Good afternoon,

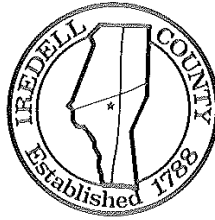
After attending the public comment meeting in Cornelius on January 18, 2012, it is abundantly clear that the nonattainment boundaries being considered indicate no changes that would affect Iredell County.

In March of 2010, the Iredell County Board of Commissioners adopted a resolution that, in part, addressed their opposition to any changes nonattainment boundary. Given the duration of time that has elapsed while the decision to consider changes to the nonattainment boundary is being considered, I wanted to ensure that the resolution is remains as an active record of public and elected official comment concerning this issue.

Should you have any questions, please do not hesitate to contact me.

Joey Raczkowski, AICP, CZO
Director, Iredell County Planning, Development, and Transportation
Services Dept.
349 N. Center Street - PO Box 788
Statesville, NC 28687
T: 704/832-2322
F: 704/928-2025

Godfrey Williams, Chairman
Marvin Norman, Vice Chairman
Steve Johnson
Scott Keadle
Ken Robertson



Post Office Box 788
Statesville, North Carolina 28687
Phone (704) 878-3058
Fax (704) 878-3053
www.co.iredell.nc.us

IREDELL COUNTY BOARD OF COMMISSIONERS

COPY

TO: ☐ The Honorable Richard Burr
☐ The Honorable Virginia Foxx
☐ The Honorable Kay Hagan
☐ The Honorable Patrick McHenry

COPY

FROM: Marvin Norman, Chairman, Iredell County Board of Commissioners

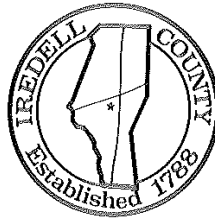
SUBJECT: U.S. EPA's Proposed Rule on National Ambient Air Quality Standards
For Ozone

DATE: May 18, 2010

Attached, please find documentation indicating that Iredell County, the Towns of Mooresville, Troutman, Harmony, as well as the City of Statesville, along with the Iredell County Farm Bureau, Inc., and the Iredell County Farmland Preservation Advisory Board have all adopted a resolution in reference to the above subject matter. On behalf of all the interested parties, I respectfully ask that you review the resolution and consider the recommendations and requests.

Your attention to this matter is appreciated.

Godfrey Williams, Chairman
Marvin Norman, Vice Chairman
Steve Johnson
Scott Keadle
Ken Robertson



Post Office Box 788
Statesville, North Carolina 28687
Phone (704) 878-3058
Fax (704) 878-3053
www.co.iredell.nc.us

IREDELL COUNTY BOARD OF COMMISSIONERS

Resolution

In Response to US EPA's Proposed Rule on National Ambient Air Quality Standards (NAAQS) for Ozone

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Nonroad Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that **451** counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that **248** (including Rowan) are projected to remain in nonattainment in 2020 if the standard is established at .065 ppm, and that **99** (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship.

NOW THEREFORE, BE IT RESOLVED that the Iredell County Board of Commissioners hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

BE IT FURTHER RESOLVED that the EPA not expand the range of any current nonattainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

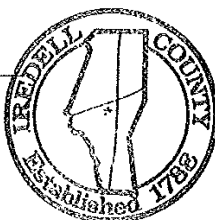
Adopted this 2nd day of March 2010.

IREDELL COUNTY BOARD OF COMMISSIONERS

Maurin Nauman

Attest:

Jean C. Moore





Town of Mooresville

NORTH CAROLINA

TELEPHONE
704-663-3800

POST OFFICE BOX 878
MOORESVILLE, NORTH CAROLINA 28115

Town of Mooresville Resolution In Response to US EPA's Proposed Rule on National Ambient Air Quality Standards (NAAQS) for Ozone

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Nonroad Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark-Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards,

show that 451 counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that 248 (including Rowan) are projected to remain in non-attainment in 2020 if the standard is established at .065 ppm, and that 99 (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

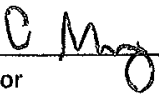
WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship;

NOW THEREFORE, BE IT RESOLVED that the Town of Mooresville Board of Commissioners hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

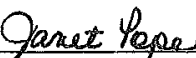
BE IT FURTHER RESOLVED that the EPA not expand the range of any current non-attainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

ADOPTED this 1st day of March, 2010.



Mayor



Town Clerk



Irmitman

Resolution 08-10

In Response to US EPA's Proposed Rule on National Ambient Air Quality Standards (NAAQS) for Ozone

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Nonroad Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark-Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that 451 counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that 248 (including Rowan) are projected to remain in non-attainment in 2020 if the

standard is established at .065 ppm, and that 99 (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

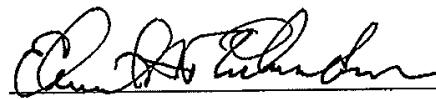
WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship;

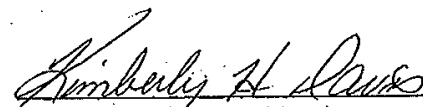
NOW THEREFORE, BE IT RESOLVED that the Board of Aldermen of the Town of Troutman hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

BE IT FURTHER RESOLVED that the EPA not expand the range of any current non-attainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

ADOPTED this 11th day of March, 2010.


Mayor Elbert H. Richardson


Town Clerk, Kimberly H. Davis
Town of Troutman

Harmony, nc

Resolution
In Response to US EPA's Proposed Rule on
National Ambient Air Quality Standards (NAAQS) for Ozone

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Nonroad Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that **451** counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that **248** (including Rowan) are projected to remain in nonattainment in 2020 if the standard is established at .065 ppm, and that **99** (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship.

NOW THEREFORE, BE IT RESOLVED that the Town of Harmony hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

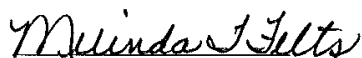
BE IT FURTHER RESOLVED that the EPA not expand the range of any current nonattainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

Adopted this 5th day of April, 2010.

TOWN OF HARMONY BOARD OF ALDERMEN



Attest: 

RESOLUTION NO. 04-10

CITY OF STATESVILLE

RESOLUTION IN RESPONSE TO US EPA'S PROPOSED RULE ON
NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) FOR OZONE

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Non-road Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark-Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that 451 counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that 248 (including Rowan) are projected to remain in non-attainment in 2020 if the standard is established at .065 ppm, and that 99 (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ)

funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship;

NOW THEREFORE, BE IT RESOLVED that the City of Statesville hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

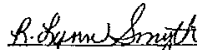
BE IT FURTHER RESOLVED that the EPA not expand the range of any current non-attainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

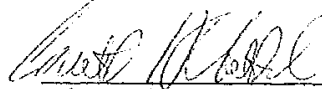
BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

Adopted this the 15th day of March, 2010.

ATTEST:

City of Statesville


R. Lynn Smyth, Deputy City Clerk


Constantine H. Kutteh, Mayor





Town of Love Valley

May 10th, 2010

Mr. Marvin Norman
Vice Chairman Iredell County Board of Commissioners
P.O. Box 788
Statesville, NC
28687

Dear Mr. Norman:

On May 10th, 2010, the Love Valley Town Council approved a resolution regarding the Environmental Protection Agency's proposed rules on national ambient air quality standards for ozone.

Sincerely,

Ana Kennedy
Town Clerk

IREDELL COUNTY FARM BUREAU INC.

Resolution
In Response to US EPA'S Proposed Rule on
National Ambient Air Quality Standards (NAAQS) for Ozone

Whereas, Iredell County Farm Bureau supports good air quality and recognizes its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

Whereas, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

Whereas, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

Whereas, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

Whereas, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

Whereas, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- . The Clean Air Interstate Rule
- . The Clean Air Mercury Rule
- . The Clean Air Visibility Rule
- . The Clean Air Nonroad Diesel Rule
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- . The Heavy Duty Diesel Rule
- . The proposed rules for Locomotive and Marine Vessels and for Small Spark Ignition Engines, and
- . An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that **451** counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that **248** (including Rowan) are projected to remain in nonattainment in 2020 if the standard is established at .065 ppm, and that **99** (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm: and

Whereas, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

Whereas, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

Whereas, there is inadequate federal support available at present, in the form of federal control measurers and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

Whereas, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship.


Now Therefore, Be It Resolved that the Iredell County Farm Bureau, Inc .hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between “background” levels and the impact of normal human enterprise in establishing the standards: and

Be It Further Resolved, that the EPA not expand the range of any current nonattainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

Be It Further Resolved, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measurers to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

Adopted this 1st day of April 2010.

Iredell County Farm Bureau Inc.


David W. Sides, President

Iredell County Farmland Preservation Advisory Board

Resolution In Response to US EPA's Proposed Rule on National Ambient Air Quality Standards (NAAQS) for Ozone

WHEREAS, the local governments of Iredell County support good air quality and recognize its contribution to human health, and have voluntarily undertaken a number of measures to promote air quality; and

WHEREAS, the Clean Air Act requires the US Environmental Protection Agency (EPA) to periodically review standards for ozone in light of scientific research on the impact of this pollutant on human health; and

WHEREAS, the most recent review of this research prompted EPA to propose changes to the NAAQS for ozone, including a revised 8-hour primary standard in the range of .070 to .060 parts per million (ppm), applicable nationwide, and a second standard to protect crops and vegetation, measured using a different methodology; and

WHEREAS, a hemispheric rise in background ozone levels has resulted in background levels in the United States and Canada estimated to range from .020 to .050 ppm (or higher); and

WHEREAS, establishing a primary standard of .060 ppm closely approaches the higher of these estimated background levels, and would place virtually every urbanized county, and many rural counties, in the United States in non-attainment of the standard; and

WHEREAS, EPA's own estimates, considering implementation of the expected emissions reductions from federal programs by 2020 including:

- The Clean Air Interstate Rule
- The Clean Air Mercury Rule
- The Clean Air Visibility Rule
- The Clean Air Nonroad Diesel Rule
- The Light-Duty Vehicle Tier 2 Rule
- The Heavy Duty Diesel Rule
- The proposed rules for Locomotive and Marine Vessels and for Small Spark Ignition Engines, and
- An estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards, show that **451** counties in the United States (among those having monitors), including Lincoln and Union, are projected to remain in non-attainment in 2020 if the standard is established at .060 ppm, that **248** (including Rowan) are projected to remain in nonattainment in 2020 if the standard is established at .065 ppm, and that **99** (including Mecklenburg) are projected to remain in non-attainment in 2020 if the standard is established at .070 ppm; and

WHEREAS, non-attainment status carries serious ramifications for economic investment and job development, potentially making it harder for Iredell County's 20 permitted industries to grow, and potentially pushing jobs into areas of attainment but increasing the travel of workers to reach those jobs (thereby potentially resulting in increased traffic congestion and motor vehicle emissions); and

WHEREAS, measures to attain such significantly lowered standards impose additional expense on local governments, employers, and families, at a time of extreme economic hardship; and

WHEREAS, there is inadequate federal support available at present, in the form of federal control measures and programs, Congestion Mitigation/Air Quality (CMAQ) funds, air quality grant programs through EPA, other federal grants-in-aid, or tax relief to support the implementation of measures that would be needed to attain any of the proposed standards, but particularly those of .069 and below; and

WHEREAS, EPA is considering an accelerated timeline for attainment of the new standards, again in a time of great economic hardship.

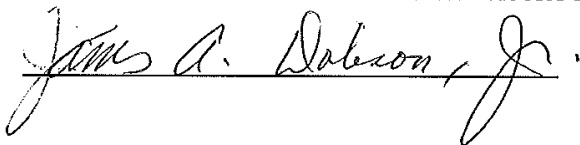
NOW THEREFORE, BE IT RESOLVED that the Iredell County Farmland Preservation Advisory Board hereby requests that EPA refrain from adopting a primary standard of .069 ppm or lower, that any secondary standard adopted be consistent with the primary standard both in level and methodology of calculation, and that EPA consider a differential between "background" levels and the impact of normal human enterprise in establishing the standards; and

BE IT FURTHER RESOLVED that the EPA not expand the range of any current nonattainment areas for these revisions of the standard, nor adopt an accelerated time line for attainment at a time of economic hardship; and

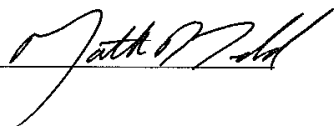
BE IT FURTHER RESOLVED, that the United States Congress make available adequate funding to ensure that local governments, employers, and citizens are not forced to assume the full cost of measures to attain any adopted National Ambient Air Quality Standards, primary or secondary, for ozone.

Adopted this 8th day of April 2010.

IREDELL COUNTY FARMLAND PRESERVATION ADVISORY BOARD



Attest:





600 East Fourth Street
Charlotte, NC 28202
704-336-2205
www.mumpo.org

February 7, 2012

Laura Boothe, Attainment Planning Branch Supervisor
North Carolina Department of Environment & Natural Resources
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Subject: Comments on Ozone Boundary Recommendations

Dear Ms. Boothe:

On behalf of the Mecklenburg-Union Metropolitan Planning Organization (MUMPO) Technical Coordinating Committee (TCC), I want to thank the Division of Air Quality for allowing this opportunity to comment on the ozone nonattainment boundary options presented in Charlotte and Cornelius on January 18, 2012.

Due to the lack of time for MUMPO to evaluate the new options defined by NCDAQ, we have not been able to receive policy direction on this very important topic. While we would prefer to recommend the October 2011 boundaries, and to state that the data for changing the existing boundaries are inconclusive, we cannot do so without offering this topic to elected officials.

The process timeline has been so truncated that it is not possible to get direction from elected officials before the announced close of the comment period, February 10. The original notice for the public meetings apparently went to our elected officials in December, 2011. Based on the attendance at the public meetings on January 18, it was evident that most elected public officials did not grasp the significance of these meetings.

Staff had only a six-day notice of the public meetings, receiving an e-mail on January 12, 2012. Many of our TCC members are active partners with NCDAQ with regard to issues such as SIPs and transportation conformity, yet we were not informed of the new options defined by NCDAQ prior to NCDAQ's presentation at the public meetings.

Due to the possible implications (environmental, economic, and political) resulting from excluding certain Townships versus keeping the current nonattainment boundary for the 2008 standard, MUMPO reserves the right to submit comments after February 10. We will send comments to EPA and NCDAQ, pending direction from MUMPO Board.

Sincerely:

William S. Coxe, Chair
Technical Coordinating Committee, Mecklenburg-Union MPO

CHARLOTTE CORNELIUS DAVIDSON HUNTERSVILLE INDIAN TRAIL MATTHEWS MECKLENBURG COUNTY MINT HILL MONROE NCDOT
PINEVILLE STALLINGS UNION COUNTY WAXHAW WEDDINGTON WESLEY CHAPEL WINGATE

**RESOLUTION TO REMAIN IN THE METROLINA OZONE AIR QUALITY
NONATTAINMENT AREA BOUNDARY**

WHEREAS, the Marshville Town Council understands the current nonattainment boundary established for the 1997 air quality standard includes the counties of: Mecklenburg, Union, Cabarrus, Rowan, Gaston, Lincoln, and the southern portion of Iredell; and

WHEREAS, since the ozone air quality has much improved in the Metrolina nonattainment region since the implementation of the 1997 air quality standard the NCDAQ is discussing shrinking the boundary by excluding certain Townships from the nonattainment boundary; and

WHEREAS, despite however justifiable the removal of certain Townships from the proposed nonattainment area may be, reservations exist due to the likelihood of a revision to the ozone standard in 2013-14, the fate of the 1997 standard, and conformity of the various Townships that make up the Metrolina Nonattainment area; and

WHEREAS, to remain in the nonattainment area boundary qualifies the Town of Marshville for possible CMAQ grant dollars; and

WHEREAS, the Marshville Town Council recognizes that to remain in the nonattainment area boundary is in the best interest for the Town of Marshville at this time.

NOW, THEREFORE, BE IT RESOLVED that I, Franklin Deese, Mayor and the Members of the Town Council of Marshville do hereby express our desire to opt to remain in the Metrolina Nonattainment Area Boundary.

This Resolution shall be entered upon the permanent Minutes of the Town Council.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the Seal of the Town of Marshville to be affixed this the 10 day of February, 2012


Franklin D. Deese, Mayor


Attest: Tonya Johnson, Town Clerk



From: [Elaine Powell](#)
To: [SVC_DENR.DAO.publiccomments;](#)
cc: [Witcraft, Nick; June Blotnick; kminn@salisburypost.com;](#)
Subject: Public Comments on ozone boundary recommendations
Date: Sunday, January 29, 2012 4:09:03 PM

Dear Nick,

I am concerned that excluding the proposed townships will only encourage sprawl that could potentially make the air quality worse.

If this proposal goes forward, I would like to request a public hearing, since air quality is such an important issue. I don't know if you have rules about where you have to hold the public hearings, but if possible I hope that each one will be close to a medical facility where medical professionals (pulmonologists, respiratory therapists, etc.) can attend.

For all of the work that you do to protect our air, I thank you.

Sincerely,
Elaine Powell
Mecklenburg County



MECKLENBURG COUNTY
Board of County Commissioners

February 22, 2012

Ms. Gwendolyn Keyes Fleming
Regional Administrator
USEPA, Region 4
Sam Nunn Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Re: Ozone Nonattainment Boundary Recommendation
Charlotte-Gastonia-Salisbury, NC-SC Nonattainment Area

Dear Ms Fleming:

Pursuant to the requirements of the federal Clean Air Act, the Mecklenburg County Board of Commissioners submits to you and your colleagues at the U.S. Environmental Protection Agency (EPA) the County's recommendations concerning the boundaries within our region of areas that should be designated non-attainment for the March 12, 2008 8-hour ozone standard. We are recommending the boundaries described below because we believe that they are the most effective way to achieve the goals of cleaner air, healthier lives and a stronger economy.

At its February 21, 2012 meeting the Board received boundary recommendations from its citizen advisory board, the Mecklenburg County Air Quality Commission (MCAQC). Our MCAQC reviewed and discussed in depth the proposed eight-hour ozone non-attainment boundary recommendations from the North Carolina Division of Air Quality and the South Carolina Bureau of Air Quality and USEPA's December 8, 2011 response to each state's recommendation. The eight-hour ozone non-attainment designation for the Charlotte-Mecklenburg region is one of the most critical air quality issues facing the region and the County believes it is very important to address this issue aggressively.

The motion below was approved by the Mecklenburg County Board of Commissioners on February 21, 2012:

"The Board of County Commissioners for Mecklenburg County, North Carolina, believes the EPA has appropriately considered the factors to determine boundaries for the local nonattainment area, and supports and endorses the following boundary conclusions from EPA's December 8, 2011 response letters to North Carolina and South Carolina as follows:

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www.co.mecklenburg.nc.us

the EPA has preliminarily concluded that the following North Carolina counties should be included as part of the Charlotte-Gastonia-Salisbury, NC SC nonattainment area: Cabarrus, Gaston, Lincoln, Mecklenburg, Rowan and Union Counties in their entireties, and a portion of Iredell County;

and

the EPA has preliminarily concluded that the urbanized portion of York County, South Carolina, and the Catawba Indian Nation Reservation should be included as part of the Charlotte-Gastonia- Salisbury, NC-SC nonattainment area;

and further

the Board of County Commissioners for Mecklenburg County, North Carolina, believes that the northern “finger” of Lancaster County, South Carolina should be included as part of the Charlotte-Gastonia- Salisbury, NC-SC nonattainment area. This area, which contains the US 521 business corridor has and continues to experience substantial urbanization and contributes significant emissions towards ozone nonattainment. Prior to making any designation, EPA should conduct an analysis and evaluation of this area’s affect on our ozone levels.”

Mecklenburg County is committed to protecting the health of our citizens, our environment, and our economy. Solving our ozone and other air quality problems is critical to achieving those goals. Improving air quality is critical to the health of our citizens, our future growth, prosperity and quality of life. We look forward to continuing to working with EPA, the states, our neighboring counties and all of our other partners on the challenging tasks ahead to attain the 2008 8-hour ozone standard.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Cogdell, Jr.", with a stylized flourish at the end.

Harold Cogdell, Jr.
Chairman

cc Mecklenburg Board of County Commissioners
 Anthony Foxx, Mayor, City of Charlotte
 Kris Knudsen, MCAQC
 Don Willard, MCAQ
 Sheila Holman, NCDAQ
 Myra Reece, SCBAQ