



CABARRUS - ROWAN URBAN AREA
METROPOLITAN PLANNING ORGANIZATION

CABARRUS COUNTY • CHINA GROVE • CLEVELAND • CONCORD • GRANITE QUARRY • HARRISBURG • KANNAPOLIS • LANDIS
MIDLAND • MOUNT PLEASANT • ROCKWELL • EAST SPENCER • ROWAN COUNTY • SALISBURY • SPENCER • FAITH

March 3, 2015

Ms. Gina McCarthy, Administrator
US Environmental Protection Agency
Mail Code 28221T
Attention Docket ID No. OAR-2008-0699
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Resolution in Support of the Current National Ambient Air Quality Standards for Ozone

Dear Secretary McCarthy:

This letter is to convey the Cabarrus-Rowan Metropolitan Planning Organization (CR MPO) support of the current National Ambient Air Quality Standards for Ozone. The Cabarrus-Rowan MPO is made up of 16 local governments in Cabarrus and Rowan Counties. Our MPO strongly supports the clean air standards at a level that balances public health goals with patience for realizing some of the tangible progressive efforts already underway in our state and region. We are striving to meet the existing standard through cooperative efforts of the business community, local governments, and the general public. We believe a lower standard may compromise this spirit of cooperation and result in added social and financial costs that will not translate into equitable gains in the air we breathe. At the January 28, 2015 meeting, the CR MPO passed the enclosed resolution and requests your consideration of its' contents.

Thank you for any assistance that you can provide to us on this matter.

Sincerely,



Phil Conrad, Executive Director
Cabarrus-Rowan MPO

enclosure

cc: Carl Ford, NC House of Representatives
Harry Warren, NC House of Representatives
Fletcher Hartsell, NC Senate
Andrew Brock, NC Senate
Larry Pittman, NC House of Representatives
Linda Johnson, NC House of Representatives

RESOLUTION IN SUPPORT OF THE CURRENT NATIONAL AMBIENT AIR QUALITY STANDARDS FOR OZONE

WHEREAS, the Cabarrus-Rowan MPO strongly supports clean-air standards at a level that ensures public health and improves quality of life for all our residents; and

WHEREAS, both state and local governments and private industry are making measurable progress in improving air quality, with the national average for ozone levels having decreased by 21 percent from 1980 to 2006; aggregate emissions of six principal pollutants down more than half since 1980 despite a 46 percent increase in population; and programs in place to cut power plant emissions by more than 40% from today's levels by 2010 in 30 eastern jurisdictions, reduce emissions vehicles by 77 to 95 percent from 2004 levels, dramatically reduce airborne levels of mercury and virtually eliminate diesel emissions; and

WHEREAS, state and local governments and business are working diligently to meet the Environmental Protection Agency's current National Ambient Air Quality Standard for ground level ozone by the 2020 deadline, investing approximately \$20 billion each year, according to EPA estimates; and

WHEREAS, the Environmental Protection Agency, in the course of its required review of NAAQS, is nevertheless considering a further tightening of the ozone standard to 0.065 parts per million; and

WHEREAS, further tightening the ozone standard, even before the current standard is met, could significantly expand the number of nonattainment areas/counties and result in emissions controls in additional rural areas with minimal population, thereby imposing significant administrative and regulatory burdens on more citizens, businesses and local governments; and

WHEREAS, the Agency is proposing this action with little evidence that the change in standards will result in significant health benefits and with virtually no analysis of the enormous costs that will be charged to Cabarrus-Rowan Urban Area businesses and consumers;

NOW, THEREFORE, BE IT RESOLVED, that the Cabarrus-Rowan MPO, advise and strongly urge EPA to retain the existing NAAQS for ozone; and

BE IT FURTHER RESOLVED, that the EPA is urged to identify any unfunded mandates or other administrative and economic burdens for state or local governments or agencies that would derive from changes to the NAAQS for ozone.

Adopted this the 28th day of January 2015.



Chair, Cabarrus-Rowan Transportation Advisory Committee