



RONNIE McDONALD
BASTROP COUNTY JUDGE

March 8, 2010

Administrator Lisa P. Jackson
Environmental Protection Agency
Mail Code 6102T
1200 Pennsylvania Ave
Washington DC 20460

RE: Docket ID No. EPA-HQ-OAR-2005-0172

Dear Ms. Jackson:

Bastrop County is a rural and suburban county located just east of Austin, Texas. 2008 population estimates for our entire county were 73,491. Our County is also one of 5 in the Austin-Round Rock Metropolitan Statistical Area, the potential area of a nonattainment designation. As such, Bastrop County has actively participated in voluntary clean air efforts including being a signatory on the 1-hour Ozone Flex Plan, the Early Action Compact and the 8-hour Ozone Flex Program. In addition, Bastrop County regularly participates in programs of the Clean Air Coalition and Clean Air Force. These are all monumental steps for a county with a population less than 80,000. These voluntary programs have proven successful, with Central Texas' design-value for ozone decreasing from 90 parts per billion in 1999 to 75 ppb in 2009.

The proposed National Ambient Air Quality Standards for Ozone, as published in the Federal Register, Volume 75, Number 11, and January 19, 2010 on pages 2938-3052 would set the NAAQs at a level consistent/lower than the typical transported background emissions levels of 65-75 ppb often experienced on high ozone days in our area; making implementation of the new standard unattainable. The County is concerned with the financial implications to our citizens should we be declared as being in nonattainment of an unattainable standard.

On behalf of the Bastrop County Commissioners Court, I offer the following comments on the proposed changes to the National Ambient Air Quality Standards for Ozone:

1. We believe that the primary and secondary standards should remain at the 2008 Ozone level of 75 parts per billion.
2. We request that the EPA consider transport and background Ozone levels in the new standard. A lower standard than the transport and background levels is completely unachievable.
3. We request that the Early Action Compact voluntary emissions reduction model continue to be supported by the EPA and be an allowable compliance option.

Sincerely,

A handwritten signature in black ink that reads "Ronnie McDonald".

Ronnie McDonald
County Judge