

L. Nelson Roberts - 2008 Ground Level Ozone Nonattainment Boundary Recommendations

From: "Brad Wyche" <bwyche@upstateforever.org>
To: <robertln@dhec.sc.gov>
Date: 1/7/2009 2:30 PM
Subject: 2008 Ground Level Ozone Nonattainment Boundary Recommendations

Dear Mr. Roberts:

Upstate Forever is a nonprofit, membership-based organization that promotes sensible growth and protects special places in the Upstate region of South Carolina. We seek to accomplish our mission through three basic programs: Land Trust, Sustainable Communities, and Clean Air and Water. Under our Clean Air and Water program, we have been actively involved in addressing ground-level ozone issues in our region for several years.

We are writing to express our support for the use of the Core Based Statistical Area (CBSA) for the Department's 2008 ground level ozone nonattainment boundary recommendations to the EPA. We have reviewed the boundary recommendations presented by the Department at the October 27, 2008 Air Quality Forum in Greenville as well as the 2008 presumptive ozone nonattainment boundaries map posted on the Bureau of Air Quality's website. We believe that the CBSA for the Upstate, with the addition of Abbeville County, is the most appropriate nonattainment boundary for ground level ozone for our region.

Section 107(d)(1) of the Clean Air Act defines an area as nonattainment if it is violating the ambient air quality standard or if it is contributing to a violation in a nearby area. In its December 4, 2008 guidance on ozone nonattainment area designations, the EPA states that ground-level ozone pollution is "pervasive and readily transported" and thus "believes it is important to examine ozone-contributing emissions across a relatively broad geographic area."

As you know, ozone levels are strongly associated with the extent of sprawl in an area, since more sprawl means more driving which in turn results in higher levels of ground level ozone. Unfortunately, the Upstate has one of the most sprawling patterns of development in the country. A growth projection study for our region, done last year by the Strom Thurmond Institute at Clemson University, predicts the expansion of developed land from 222,000 acres in 1990 to over 1.5 million acres in 2030; all eight Upstate counties covered by the study show significant future growth. A national study done in 2002, *Measuring Sprawl and Its Impact*, ranks the Upstate as the fifth most sprawling region in the United States. Our organization is working hard to reduce the rate of sprawl in the Upstate, but there is no question that the region will continue to experience rapid growth and change. In addition, Interstate 85, a major highway and a huge magnet for development, cuts directly through the region.

It is clear that based on the Upstate's current and predicted growth trends, development throughout the region is contributing to violations of the ground level

ozone standard at the monitors in Anderson, Pickens, and Spartanburg Counties. For these reasons, we believe that the nonattainment boundary for the Upstate should be a "broad geographic area" and include the following nine counties: Anderson, Abbeville, Cherokee, Greenville, Laurens, Oconee, Pickens, Spartanburg, and Union Counties.

Thank you for your consideration of our comments. Please let me know if you have any questions or need any additional information.

Best wishes, Brad Wyche

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Upstate Forever's mission is to promote sensible growth and to protect special places in the Upstate region of South Carolina. Please join us! To become a member, visit <http://join.upstateforever.org>. Thank you for your support!