

**Resolution: Comments on the Non-Road Spark-Ignition Engine and Equipment Emission Standards Proposed Rule**

**WHEREAS**, the HGB region is in “moderate” violation of the Federal Clean Air Act National Ambient Air Quality Standards for ozone; and

**WHEREAS**, the HGB region is very close to being designated a non-attainment area for the criteria pollutant PM 2.5; and

**WHEREAS**, the HGB region is also concerned with localized elevated levels of air toxics in the ambient air; and

**WHEREAS**, the HGB region would welcome the opportunity to cut ambient air levels of other pollutants, such as carbon monoxide; and

**WHEREAS**, each of these pollutants (ozone, PM 2.5, air toxics, and carbon monoxide) are known to cause or aggravate respiratory ailments, cancer, and/or other forms of human disease; and

**WHEREAS**, each of these pollutants (ozone, PM 2.5, air toxics, and carbon monoxide) are known to cause harm to the public welfare by resulting in vegetative damage, soil & water contamination via deposition, and/or a decrease in visibility & aesthetic qualities; and

**WHEREAS**, non-road mobile sources, which include lawn and garden equipment and small marine vessels, contribute to regional air pollution; and

**WHEREAS**, these sources are preempted by the federal government and are not subject to regulatory standards at the state or local levels; and

**WHEREAS**, the U.S. Environmental Protection Agency is proposing to create and/or strengthen existing emission standards for spark-ignition engines and equipment that would reduce the emissions of ozone precursors, PM 2.5, air toxics, and carbon monoxide from these non-road mobile sources; and

**WHEREAS**, the U.S. Environmental Protection Agency is accepting public comments on its proposed rule through August 3, 2007;

**NOW, THEREFORE, BE IT HEREBY RESOLVED THAT THE REGIONAL AIR QUALITY PLANNING COMMITTEE ADVISES THE HOUSTON-GALVESTON AREA COUNCIL BOARD TO AFFIRM AND SUBMIT THE FOLLOWING LETTER TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY IN GENERAL SUPPORT OF THE NON-ROAD SPARK-IGNITION ENGINES & EQUIPMENT PROPOSED RULE**

June 26, 2007

Environmental Protection Agency  
Air Docket, Mail Code 6102T  
1200 Pennsylvania Avenue, NW.,  
Washington, DC 20460

Administrator Johnson:

The Houston-Galveston Area Council Board of Directors would like to offer general support and comments for the Environmental Protection Agency proposed rule, "Control of Emissions from Spark-Ignition Engines & Equipment," also referred to as Docket ID No. EPA-HQ-OAR-2004-0008.

As you are aware, the Houston-Galveston-Brazoria (HGB) region has been classified to be in moderate non-attainment for the 8-hour ozone NAAQS. Additionally, this region is very close to violating the PM 2.5 standard and has elevated levels of air toxics in localized areas. Collectively, these result in negative economic impacts, ecosystem damage, decreased health, and a general degradation of quality of life.

The unique industrial characteristics of the region combined with being one of the largest urbanized population centers in the nation present a particularly difficult challenge in terms of improving air quality. Though efforts to improve air quality have yielded great progress over the past decade, it is clear that much more needs to be done. The active support and participation of the federal government has been vital to air quality improvement efforts; however more than half of the ozone-forming pollution in this region is generated by mobile sources, which are beyond the jurisdiction of individual states such as Texas.

For this reason, we greatly appreciate efforts of the E.P.A. to draft this proposed rule, which targets several of these mobile sources for significant emission cuts that could not otherwise be achieved. Due consideration should be given to the economic impacts of this rule, particularly on small businesses; however, H-GAC believes that these concerns should not outweigh the more primary concerns of public health and Clean Air Act compliance. We therefore encourage the E.P.A. to enact these emission standards at the most stringent levels possible and to implement the standards as quickly as it is feasible to do so. This would provide the maximum benefit to our region's air quality improvement efforts.

Thank you for your time and consideration.

Sincerely,