

H-GAC Position On the Expansion of the HGB Nonattainment Region to Include Austin and San Jacinto Counties

H-GAC Position: The Clean Air Act (CAA) states that all areas which do not meet the National Ambient Air Quality Standard (NAAQS) for ozone due to monitored emissions violations or by contributing to the ambient air quality in a nearby not meeting the NAAQS should be included as part of a nonattainment area. Based upon this definition and the information presented below, H-GAC believes that it is unlikely that the air quality in the current HGB nonattainment region is adversely affected by Austin and San Jacinto counties. H-GAC also believes that it is unlikely that this situation will change within the next decade.

Support: The Texas Commission on Environmental Quality (TCEQ) has requested comments on potential ozone non-attainment boundaries for the 2008 revisions to the National Ambient Air Quality Standard (NAAQS) for ozone in which Austin and San Jacinto counties would be added to the current 8-county Houston-Galveston-Brazoria (HGB) nonattainment area. Based on criteria indicated in Section 107(d)(1) of the Clean Air Act (CAA) along with criteria set forth in a March 2000 U.S. Environmental Protection Agency (EPA) guidance memorandum, H-GAC believes that neither Austin nor San Jacinto counties should be added to the HGB nonattainment region.

Neither Austin nor San Jacinto counties have air quality monitors of their own. Additionally, of the two counties in question only San Jacinto County has a monitor in an adjacent county. Unfortunately, due to typical wind patterns in the HGB region which typically draw ozone from the Houston ship channel to areas in the northern part of the nonattainment region, this monitor in Conroe, Montgomery County is unlikely to provide any substantive information about ozone concentrations in San Jacinto County. Indeed, the normal wind patterns in the region are more likely to result in ozone concentration increases in Austin and San Jacinto counties as a result of the transport of emissions from the HGB region rather than transport from Austin and San Jacinto counties into the greater HGB region.

Since Austin and San Jacinto counties are not presently within a nonattainment region, no county-wide emissions controls exist aside from those state or federal emission controls that are already in place. Despite this lack of emissions controls, both counties have only a few point sources and other commercial entities which contribute to the formation of ozone precursors. This dearth of industrial facilities is not wholly unexpected since Austin and San Jacinto counties are largely rural counties unlike most of the counties which currently make up the HGB nonattainment region. From the perspective of emissions resulting from commuting, a sizable number of Austin County and San Jacinto County residents, 32% and 55% respectively commute into the current HGB nonattainment region for work purposes; however these commuters make up far less than 1% of the total commuters within the HGB region, approximately 0.37% and 0.15% respectively.

This situation is not expected to change during the next 20 to 30 years. The US Census Bureau estimates that in 2006 Austin and San Jacinto counties had populations of 26,121 and 24,370

residents respectively. By 2020, the Texas State Data Center estimates that the populations of Austin and San Jacinto counties will rise only slightly to 28,965 and 29,751 respectively. These modest population increases indicate that these counties will remain rural and as a result make only minor contributions to HGB region air quality.