Mid-Ohio Regional
Planning Commission

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June 2, 2016

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To Whom It May Concern:

This letter represents the comments submitted by the Mid-Ohio Regional Planning Commission (MORPC) on the redesignation request and maintenance plan for the Columbus, Ohio eight-hour ozone nonattainment area, submitted by Ohio EPA's Division of Air Pollution Control. MORPC supports the request that the US EPA revise the current air quality designation for the Columbus, Ohio area (Delaware, Fairfield, Franklin, Knox, Licking, and Madison counties) to attainment for the 2008 eight-hour ozone national ambient air quality standard (NAAQS).

MORPC is a voluntary association of more than 60 local governments in central Ohio. Our members recognize the importance of clean air and how it impacts the quality of life and economic vitality in the region. Since 2000, MORPC has operated the region's only air quality forecasting program. MORPC produces daily year-round air quality forecasts for ozone and particle pollution and issues Air Quality Alerts when pollution is expected to exceed levels that are safe for sensitive groups of people such as children, the elderly, those with respiratory diseases such as asthma, and outdoor workers.

As you know, exposure to ozone pollution can irritate the throat and lungs, making it more difficult to breathe, especially for individuals with respiratory conditions such as asthma, emphysema, and chronic obstructive pulmonary disease (COPD). The Centers for Disease Control and Prevention report that more than 242,000 people in Central Ohio have been diagnosed with asthma. Furthermore, air quality non-compliance of federally established healthy levels of pollution can adversely impact our region's ability to attract and retain businesses.

The region has recorded three years of quality-assured ambient air pollution data (2012-2014) demonstrating attainment of the eight-hour ozone standard. This period of ozone NAAQS attainment supports a redesignation from marginal-nonattainment to attainment for the 2008 eight-hour standard based on the requirements laid out in Section 107(d)(3)(E) of the Clean Air Act.

We look forward to continuing our efforts with the U.S. EPA, Ohio EPA, our member governments, and local stakeholders to build upon these improvements to air quality. MORPC recognizes that in October 2015, U.S. EPA promulgated a new, stronger ozone standard of 70 ppb based on extensive health science on the effects of ozone pollution. When designations are established for the 2015 standard (70 ppb), MORPC will continue proactive work with Ohio EPA and local governments to achieve or maintain air quality compliance. Our region is poised to grow significantly by 2050 with the addition of at least 500,000 more people

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and on the trajectory towards adding a million. It is vital we position the region for this continued growth while ensuring all Central Ohioans can breathe clean air, especially our most vulnerable citizens.

Thank you for the opportunity to comment on this redesignation request.

Kind regards,

William Murdock
Executive Director, MORPC