

July 24, 2008

Regional Air Quality Council  
1445 Market St. #260  
Denver, CO 80202

**Re: Control Strategy Modeling Request from Local Government and Environmental Coalition**

Dear members of the Regional Air Quality Council:

We strongly believe that a comprehensive package of strategies will be needed to protect public health by eliminating ozone levels above 75 ppb. In anticipation of a more protective EPA ozone standard, Governor Ritter directed the RAQC to develop a plan now that would enable the state to ultimately achieve the new standard. After EPA announced the revised standard of 75 ppb, the RAQC board unanimously decided to aim for meeting the new standard in this planning period.

In order to meet these goals, which we strongly support, the LGEC recommends that the RAQC Board request that the following packages be modeled by the contractor:

- Package #1: RAQC-approved strategies currently recommended to be included in the SIP Proposal
- Package #2: All strategies included in Package #1; additional strategies such that the following are considered, at a minimum: North Front Range I/M program; condensate tank controls at new and existing sources; pneumatic valve controls; federal Reformulated Gasoline; NOx controls at large stationary sources
- Package #3: Statewide options: Extending oil and gas VOC controls for the NAA statewide; 60% NOx point source reductions; RICE controls; 10% area and nonroad NOx reductions.

The stakeholder process has identified numerous reasonable and promising strategies for reducing unhealthy ozone levels in the nonattainment area. Initial modeling results have indicated that a comprehensive package of strategies will be needed to reduce ozone levels beyond 84 ppb. In order to recognize the valuable effort that went into the stakeholder process and to enable the RAQC to meet the Governor's directive and its own stated goal, we believe it is essential that modeling be performed on a comprehensive control strategy package. These modeling results will inform decisions made at this time and lay the necessary groundwork for timely progress on additional measures that will be needed to attain and maintain the 75 ppb standard. Modeling only a limited subset of the control strategies would limit the flexibility of the current SIP process and delay further progress. Please act today to ensure meaningful public debate and informed decision-making on this important public health issue.

Thank you for your attention to these matters.

Sincerely,  
The Local Government and Environmental Coalition members

Boulder County Public Health  
City of Fort Collins Air Quality Program  
Denver Environmental Health

Environmental Defense Fund  
Rocky Mountain Clean Air Action

## Mid-Summer Ozone Analysis Shows Dangerous Levels Across the Front Range; Imperative for Clean Air Solutions

Environmental Defense Fund has completed new analysis evaluating smog concentrations at monitors across the Colorado Front Range through July 15<sup>th</sup>. This mid-summer assessment shows high ozone levels have been measured at numerous monitors—spanning from the north in Fort Collins to the south in Colorado Springs—and that unhealthy ozone has been recorded on numerous summer days. In several alarming instances, concentrations have soared far above the nation’s health standards. The combination of high peak ozone levels and multiple days exceeding health standards highlights the need for action to protect human health from ozone air pollution.

