

South Central Planning & Development Commission

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April 23, 2013

Environmental Protection Agency
Office of Air Quality Planning and Standards (OAQPS)
Attention: Laura Bunte – Ozone Advance Program C304-01
109 TW Alexander Drive
Research Triangle Park, NC 27711

RE: Notice of Intent to Join PM Advance Program

Houma-Thibodaux Metropolitan Planning Organization

Dear Ms. Bunte:

Please accept this letter as our Notice of Intent and request to support our Metropolitan Planning Organization (MPO) region in regards to their request to be accepted into the EPA's PM Advance Program. The Houma-Thibodaux Metropolitan Planning Organization (HTMPO) represents the Parishes of Terrebonne, Lafourche and Assumption within the State of Louisiana. Our mission is to have a continuous, cooperative, and comprehensive transportation planning process that results in plans, programs, and projects that consider all transportation modes and support metropolitan community and economic development and social goals.

Our area of the state is monitored for the pollutant PM_{2.5} using FRM monitors at the following locations:

Houma (Gray)	221090001 – Houma Site
Houma (Oray)	221090001 - Houlila Site

At the present time, our area is currently designated as attainment for the pollutant PM_{2.5}. The Louisiana Department of Environmental Quality continues to input required emission inventory information into the National Emissions Inventory System (NEI) for all relevant point sources within the boundaries of our MSA and the region of South Central Planning & Development Commission. We believe that our current attainment status makes us a worthy candidate for the PM Advance program.

We wish to work proactively with business and community leaders to identify and implement programs that result in cleaner air for our citizens. It would benefit us to make every reasonable effort to avoid a future non-attainment designation. In addition to the health concerns (and stigma) associated with such a designation, there are tremendous economic impacts. Stricter permitting and emissions requirements imposed when an area is designated as non-attainment will make it more difficult for us to attract new industry and stifle existing industries wishing to expand. As you know,

new regulations and requirements could also increase the cost of gasoline and other goods and services – costs that our communities will be forced to bear.

During the course of the next year, we will be using our best efforts to incorporate a plan of action into our efforts to reduce both PM and ozone. We want to move quickly toward identifying steps that may reduce pollutant levels within our area. It is our intent to implement programs and measures as soon as possible so that we can begin collecting information as to our plan's effectiveness.

We look forward to receiving notification that we have been accepted into the PM Advance Program. Please contact Kevin Belanger at (985) 851-2900 or Kevin@scpdc.org should you require further information regarding this matter.

Sincerely,

Danny Babin

Chairman, HTMPO Policy Committee

ATTEST:

Keyin Belanger SCPDC CEO

cc: DEQ Air Permits Division