

TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER



August 16, 2010

Ms. Lisa Jackson, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Jackson:

The State of Texas has proven itself a leader in environmental stewardship on various fronts by ensuring our policies and regulatory structure reduce threats to public health based on sound science with measurable outcomes. The Texas Department of Agriculture (TDA) is responsible for fostering economic development in rural areas of the state and promoting the agriculture industry, and as you know, management of our natural resources, including air quality, is an important component of these efforts.

As the U.S. Environmental Protection Agency (EPA) moves forward in evaluating the national ambient air quality standards for coarse particulate matter (PM₁₀), EPA should not reduce the current 150 micrograms per cubic meter standard ($\mu\text{g}/\text{m}^3$). The Policy Assessment for the Review of the Particulate Matter National Ambient Air Quality Standards contemplates reducing the standard to 85 or 65 $\mu\text{g}/\text{m}^3$; however, in the same document EPA staff establishes the current 150 $\mu\text{g}/\text{m}^3$ standard is effective in protecting the public.

Reducing the PM₁₀ standard would only prove damaging to Texas because the action could result in many parts of the state, where the quality of the air is already good and is not threatening to public health, to be classified as nonattainment areas, bringing unnecessary and burdensome regulations. In these areas, natural occurrences, rather than anthropogenic sources, would potentially cause exceedances of a lower PM₁₀ standard, meaning strategies to reduce coarse particulate matter would produce little benefit but prove costly to agriculture producers and Texas consumers. Regulating naturally occurring dust storms, transportation on dirt roads, and the harvesting and processing of our food and fiber would actually harm public health and welfare, which cannot be EPA's goal.

Thank you for the opportunity to provide input. As you continue reviewing the PM₁₀ standard, it is imperative all regulatory decisions are based on thorough and sound research. Please feel free to contact my office if I may provide additional information.

Sincerely yours,

Todd Staples

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