



June 22, 2012

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 Ozone Advance Program
Capital Region Planning Commission – Baton Rouge Metropolitan Planning Area
Baton Rouge Clean Air Coalition (BRCAC)

Dear Ms. Bunte:

Please accept this letter as our Notice of Intent and request to be accepted into the EPA's Ozone Advance Program. The Capital Region Planning Commission and the Baton Rouge Clean Air Coalition are jointly submitting this request to enter into the EPA's Ozone Advance Program. The Capital Region Planning Commission serves as the Metropolitan Planning Organization for the Parishes of Ascension, East Baton Rouge, Iberville, Livingston and West Baton Rouge within the State of Louisiana. More importantly we work together with Baton Rouge Clean Air Coalition that represents local governments, businesses, educational institutions, and civic and environmental organizations committed to improving air quality in the Greater Baton Rouge area through voluntary actions. Our goals are: (1) to improve air quality through voluntary actions; (2) create public awareness and promote individual responsibility through education; and (3) provide credible measures of air quality improvement efforts.

Members of Our Coalition Include:

- Baton Rouge Area Chamber of Commerce
- Capital Region Planning Commission – Baton Rouge MPO
- Louisiana Department of Environmental Quality
- Louisiana Department of Natural Resources
- LSU
- LSU Center for Energy Studies
- Louisiana Association of Business and Industry
- Louisiana Mid-Continent Oil and Gas Association
- Louisiana Chemical Association
- Greater Baton Rouge Clean Cities Coalition
- ExxonMobil
- Dow Chemical Company
- Trinity Consultants
- Harris, DeVille & Associates
- Providence Engineering and Environmental Group

Our area of the state is monitored for the pollutant ozone at the following locations:

Baton Rouge	220330009 – Capitol Site 220330003 – LSU Site 220470009 – Bayou Plaquemine Site 220470012 – Carville Site 220050004 – Dutchtown Site 220630002 – French Settlement Site 220770001 – New Roads Site 221210001 – Port Allen Site 220330013 – Pride Site
-------------	---

At the present time, our area is currently designated as attainment for the pollutant ozone. 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 Capital Region Planning District. We believe that our current attainment status makes us a worthy candidate for the Ozone 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 any future designation actions. 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.

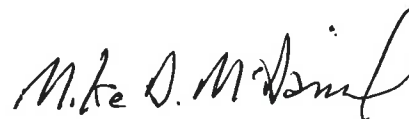
During the course of the next year, we will be using our best efforts to develop a plan of action. We want to move quickly toward identifying steps that may reduce ozone levels within our area. It is our intent to implement programs and measures as soon as possible so that we can begin collecting information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

We look forward to receiving notification that we have been accepted into the Ozone Advance Program. Please contact me at 225-383-5203 or at hdugas@brgov.com or should you require further information regarding this matter.

Sincerely,



Huey P. Dugas
Executive Director - CRPC



Dr. Mike McDaniel
Executive Director - BRCAC

cc: DEQ Air Permits Division
BRCAC