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July 9, 2025

Good morning, Commissioners. I'm Kathryn Guerra with the Texas office of Public Citizen. Public Citizen is a nonprofit consumer advocacy organization that champions the public interest in the halls of power.

I'm here to support the TCEQ's efforts to revise the State Implementation Plan for Bexar County's ozone nonattainment status change from moderate to serious, which would allow the agency to implement more stringent air quality improvement measures. We take no issue with the SIP revisions, but do take issue with the agency's phrasing of the public effect of this rulemaking, which states:

"The general public in Bexar County may benefit from the reduction in VOCs associated with the proposed rulemaking. Reduced VOC emissions may result in less ozone formation in the area, which may help improve air quality."

Item 22 on today's agenda has similar language for NOx emissions.

Item 23 says that, *"the general public in the nonattainment area may benefit from reduced emissions associated with a Reasonable Further Progress demonstration."*

Lastly, Item 24 states, *"The general public in the Bexar County ozone nonattainment area may benefit from the area ultimately meeting the 2015 eight-hour ozone NAAQS and the area being redesignated as attainment for the 2015 eight-hour NAAQS."*

After participating in the recent Section 185 Fee public hearing and the question and answer session with TCEQ staff, it concerns me that the agency's stated, and subsequently clarified position, is that the program that has both "non-attainment" and "clean air" in its title is not intended to effectuate attainment or achieve clean air.

The agency's intentional misinterpretation of the Clean Air Act and hesitation to robustly implement these air quality improvement programs creates public distrust in the agency's ability to implement them effectively. The science behind air pollution and its detrimental impact on the public is sound.

Reducing air pollution improves the air quality, which in turn improves public health. Achieving the eight-hour ozone national ambient air quality standards will undoubtedly benefit the public and the environment. These are the basic tenets of the Clean Air Act. The agency's language in these proposed rulemakings should unambiguously reflect that.



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Lastly, an administrative issue related to public participation in these meetings. Like Councilwoman Casnovsky, a previous speaker this morning, I registered to speak on this item ten days ago and received an email confirmation with instructions to join after this meeting started and only after emailing staff. I would hope we could do better, especially considering the Sunset recommendations, as Commissioner Janecka just mentioned, for the agency to increase and improve public interaction with the TCEQ during decision-making opportunities. Thank you.