

December 31, 2006

John M. Mooney, Chief,
Criteria Pollutant Section
Air Programs Branch, (AR-18J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard, 18th Floor
Chicago, IL 60604

Docket ID No. EPA-R05-OAR-2006-0517

Dear Mr. Mooney:

The Crystal Lake & Watershed Association (CLWA) would like to submit comments in support of the petition by the Michigan Department of Environmental Quality (MDEQ) to redesignate Benzie County to attainment status for the 8-Hour Ozone National Ambient Air Quality Standard (1).

The Crystal Lake Watershed (Benzie Co.) contains many diverse, but hydrologically intertwined ecologies and unique environmental niches, including active sand dunes, forested heights, wetlands, tributaries, and Crystal Lake, the 9th largest lake in Michigan - an immense body of pristine water of exceptional clarity, sandy shoreline, mixed sandy and rocky nearshore perimeter, deep marl bottom, and high-ridged vistas. These unique features can be very resistant or potentially vulnerable to environmental impacts, and demand responsible stewardship and watershed management. There are no significant point sources of air pollution in Benzie County, a lightly populated rural environment where the primary industries are agriculture and tourism benefiting from a climate moderated by Lake Michigan.

Exemplified in the literature of scientific explorations and resort travels dating from the mid-1800's to the present day, the area of northwest lower Michigan including Benzie County is justly famous for its climate and as a vacation destination so dearly sought after by city dwellers seeking to escape the heat, humidity, and air pollution of urban centers. It is indeed ironic that one of the most pristine recreational areas of summer resorts in the U.S, and whose virtues of pure, clean, and invigorating air are widely extolled, was arbitrarily designated for supposedly poor air quality not fairly attributable to its own doing!

As described by Thoreau, "A field of water betrays the spirit that is in the air. It is continually receiving new life and motion from above. It is intermediate in its nature between land and sky. We shall, perhaps, look down thus on the surface of air at length, and mark where a still subtler spirit sweeps over it."
-- H. D. Thoreau, Walden, Chapter 9, The Ponds, 1854.

The EPA initially considered some counties in Michigan that do not have ozone monitors for purposes of designating them as non-attainment based on monitoring in adjacent counties or from the fact that they were in the same MSA as an adjacent non-attainment county. There is also a potential for adverse impacts on air quality through extended air transport. The prevailing winds over Lake Michigan carry ozone precursors toward Crystal Lake from large metropolitan areas hundreds of miles to the south and west. Peak ozone levels occur throughout Michigan and other Great Lakes states during the summer months since these reactions are stimulated by bright sunlight and warm temperatures.

The Michigan Department of Environmental Quality (MDEQ) observed that the "Analysis of ambient levels of ozone has indicated that proximity to Lake Michigan and Chicago plays a very important role in transport of elevated ozone levels from the southwestern most site in Coloma, northwestward along the shoreline toward Holland, onward to Muskegon, Ludington, and Frankfort. The impact of the land-lake breezes and emissions from Chicago and Gary should also influence levels of air toxics in the region" (1). "Due to ozone transport from upwind areas, the monitors located closest to Lake Michigan (Frankfort, Scottville, and Jenison) typically have higher ozone levels than monitors located further inland in the Grand Rapids, Kalamazoo, and Lansing nonattainment areas, despite having much smaller populations and fewer local emissions of ozone precursors" (2).

The CLWA is a nonprofit 501(c)(3) organization with over 1,200 members that support a comprehensive program of activities for students, riparians, and visitors of the Crystal Lake Watershed located in Benzie Co. The CLWA encourages members to contact local and state government on local issues of critical importance to the sustainable development of the Crystal Lake Watershed. The CLWA was formed in 2004 upon merger of the Crystal Lake Association (CLA) and the Crystal Lake Watershed Fund (CLWF) and builds on more than 50 years of combined history to protect and promote the natural qualities of Crystal Lake and its surrounding Watershed. The CLWA seeks to preserve the beauty and recreational resources for future generations by monitoring water quality, providing educational programs, promoting harmonious land development, and ensuring safe use. The CLWA and its predecessors have been involved in cooperative programs and informational exchanges with many different organizations, including the Benzie/Leelanau District Health Department; the Benzie Conservation District; the Michigan Department of Environmental Quality; the USGS Geographic Names Information System (GNIS); the NOAA National Weather Service (NWS); the U.S. EPA Office of Wetlands, Oceans, and Watersheds (OWOW); and other local and state environmental organizations.

The CLWA is familiar with the 8-hour NAAQS O₃ standard and its regulatory history. We also understand the needs for redesignation under Section 107(d)(3)(E) of the Clean Air Act. We have visited the ozone monitoring site in Benzonia (*) and have also obtained many of the data from the site for review purposes.

We therefore acknowledge the findings of the Michigan Department of Environmental Quality and support their petition for redesignation of Benzie County as an attainment area submitted to the U.S. EPA.

Sincerely yours,

Dr. Stacy L. Daniels
Chair, Education & Communications Committee
Crystal Lake & Watershed Association
PO 89, Beulah, MI 49617, T 231/882-4001, www.CLWA.us , info@CLWA.us

Cc: Don Gatz, Ray Antell, Mark Walton, Aubrey Parker, Mary Maupin, Bob Appleford.

(*) DEQ-AQD-HTML Benzonia, MI (Frankfort) SITE ID: 26-019-0003 Benzonia, MI (Frankfort)
Address: 6498 River Road County: Benzie MSA: Not in a MSA Land Use: Residential
Location Setting: Rural Parameters Monitored: O₃, Resultant WS, Resultant WD, Temperature

References:

1. U.S. Environmental Protection Agency, Approval and Promulgation Plans and Designation of Areas for Air Quality Planning Purposes; MI; Redesignation of Grand Rapids, Kalamazoo-Battle Creek, Lansing-East Lansing, Benzie County, Huron County, and Mason County 8-Hour Ozone Nonattainment Areas to Attainment for Ozone, 71 FR 70915-30, December 7, 2006.
2. Michigan Department of Environmental Quality, Air Quality Division, Development of an Air Toxics Monitoring Strategy for Michigan, June 27, 2002, <http://www.deq.state.mi.us/documents/deq-aqd-toxics-peerRVstrategy.pdf>.
3. MDEQ, Air Quality Division, Proposed Revision to Michigan's State Implementation Plan for Achieving the Ozone National Ambient Air Quality Standard, Request to Redesignate to Attainment Status Eleven Counties Comprising Six Ozone Nonattainment Areas in Michigan, and Proposed Maintenance Plan for Eleven Counties Comprising Six Ozone Nonattainment Areas, Counties of Ingham, Eaton, Clinton, Kent, Ottawa, Kalamazoo, Calhoun, Van Buren, Benzie, Mason, and Huron, April 2006, 102pp. <http://www.deq.state.mi.us/documents/deq-aqd-air-aqe-ozone-11countyredesignation-march06.pdf>; petition the the U.S. EPA, May 6, 2006, 121pp. <http://www.deq.state.mi.us/documents/deq-aqd-air-aqe-ozone-11countyredesignation-may06.pdf>.
4. Daniels, Stacy L., Crystal Lake & Watershed Association: A "New" Organization, The Michigan Riparian 40(1), 5- 6 (Feb. 2005). http://www.clwa.us/PDF/CLWA_MI_Riparian_Art05a.pdf