



**Council Member Letitia Plummer, At-Large 4**

Texas Commission on Environmental Quality  
Office of Policy and Regulatory Development  
MC 205  
P.O. Box 13087  
Austin, TX 78711-3087

01/16/2024

Subject: Proposed Houston Galveston Brazoria (HGB) Severe Classification Attainment Demonstration (AD) SIP Revision for the 2008 Eight-Hour Ozone NAAQS (“HGB AD SIP Revision”); Docket No. 2023-1223-SIP/Project No. 2023-110-SIP-NR

Dear Commissioners of the Texas Commission on Environmental Quality (TCEQ),

As an At-Large Council Member representing over 2.3 million residents of Houston, I am compelled to address a critical public health and environmental justice issue facing our community – the alarming levels of ozone pollution in the Houston-Galveston-Brazoria (HGB) area.

In accordance with the Clean Air Act and the 2008 National Ambient Air Quality Standards (NAAQS), I urge the TCEQ to implement the most stringent plan possible to bring the HGB area into compliance for ozone pollution. The area’s significant industrial activities, notably from large plants, refineries, and chemical facilities, have led to high levels of ozone-precursor emissions, particularly VOCs and NOx. NRG’s Parish coal plant and ExxonMobil’s Baytown complex are among the top contributors to this critical issue.

Moreover, the increasing temperatures due to climate change exacerbates this nonattainment problem. As reported by the Sierra Club, nearly half of the Texas population is exposed to dangerous levels of ozone pollution. This situation, affecting nearly 15 million people, constitutes a dire public health crisis.



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Adding to this concern, the Environmental Integrity Project's 2023 report highlights the disproportionate impact of ozone pollution on communities of color and low-income households in Houston. It reveals that these populations are more likely to be exposed to ozone levels exceeding federal standards and have seen the least improvement since these standards were established in 2008.

The continuous exposure of our residents to unsafe air quality levels is unacceptable. The TCEQ's failure to submit state plans meeting NAAQS requirements not only contravenes federal mandates but also puts the health and well-being of millions at risk. As representatives and protectors of public health, it is imperative that the Commission acts swiftly and decisively to amend the 2008 plan with the strictest regulations possible.

I urge the TCEQ to consider the gravity of this situation and the responsibilities vested in your roles. The health, safety, and environmental justice of our communities depend on your decisive actions.

Thank you for your prompt attention to this urgent matter. I, along with the residents of Houston, eagerly await your response and the necessary steps towards a cleaner, safer environment.

Sincerely,

Council Member Letitia Plummer, DDS  
At-Large 4