



**MAR 18 2015**

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The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the U.S. Environmental Protection Agency on a wide range of issues of interest and concern to local governments. More specifically, the Committee is grateful to have the opportunity to comment on EPA's proposed revisions to the National Ambient Air Quality Standards for Ozone (Ozone NAAQS).

The bottom line in the Clean Air Act is "to protect public health with an adequate margin of safety." This is also a primary goal of local governments for their citizenry. Accordingly, the LGAC supports EPA's proposal to strengthen the level of both primary and secondary ozone standards to improve public health protection for millions of Americans. The current standard of 75 parts per billion (ppb) is not adequately protective of public health, as recent public health studies (more than 1000 reviewed showing consistent evidence) have consistently shown that short-term and long-term exposure can have significant respiratory effects<sup>1</sup>. These effects are especially problematic for at-risk groups, including children, whose lungs are still developing; those with lung disease, such as asthma; people who are active and/or work outdoors; and older adults. The population of the U.S. is aging, and with that comes more elders who are more susceptible to respiratory problems caused by exposure to ozone.<sup>2</sup>

In addition, recent EPA actions, including light-duty vehicle standards, the Clean Power Plan, Mercury and Air Toxics Standards, and other proposed and final regulations will help lessen the burden on states and local communities in meeting a lower ozone NAAQS standard. Many of these other

<sup>1</sup> <http://www.epa.gov/ttn/naaqs/standards/ozone/data/20140829healthrea.pdf>

<sup>2</sup> <http://www.epa.gov/research/aging/factsheets/ahbe/ahbe-english-100-F-09-045.pdf>

regulations will have the co-benefit of lowering ozone levels, and many counties can expect lower ozone emission levels within a range of 65-70 ppb by 2025 just as a result of these other programs.<sup>3</sup>

The public health benefits of a lower ozone standard are substantial, particularly for children, the elderly, and people of all ages who have lung diseases such as asthma. A lower ozone standard will mean lower numbers of missed school and work days, hospital admissions, emergency room visits, and premature deaths. Together, a range of 65-70 ppb will yield annual health benefits of anywhere from \$6.4 to \$38 billion<sup>4</sup>. While the LGAC is aware that the Clean Air Act prohibits the consideration of cost in setting standards, these health savings vastly outweigh the annual cost of compliance (estimated at \$3.9 to \$15 billion) with a lower ozone standard.

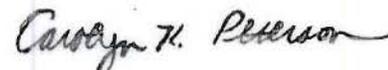
The LGAC would like to call your attention to the importance of prescribed wildfires in controlling air pollution. Prescribed burns are an integral part of the National Cohesive Wildland Fire Management Strategy, and we urge you to work closely with the U.S. Department of Agriculture and Department of Interior to ensure that federal agencies are working together toward a common goal – cleaner, healthier air.

Finally, the LGAC appreciates EPA's commitment to working in partnership with states, tribes, and local governments in implementing Ozone NAAQS as well as other EPA programs. The LGAC is confident that as we implement any new standards, EPA will continue to work with states, tribes, and local partners to make sure these standards are implemented in a flexible and cost-effective way that allows our communities to prosper and thrive. The LGAC looks forward to continued involvement and input as EPA and local governments continue taking steps to protect our human and environmental health.

Sincerely,



Mayor Bob Dixon  
Chair, LGAC



Commissioner Carolyn Peterson  
Chair, Air, Climate & Energy Workgroup

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<sup>3</sup> <http://www.epa.gov/ttn/ecas/regdata/RIAs/20141125ria.pdf>

<sup>4</sup> <http://www.epa.gov/ttn/ecas/regdata/RIAs/20141125ria.pdf>