

May 20, 2010

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Re: Broad Scientific Consensus to Lower National Ambient Air Quality Standard
for Ozone

Dear Administrator Jackson,

We, the undersigned scientists, doctors, and public health professionals, applaud EPA's decision to reevaluate the 2008 ozone standard of 0.075 ppm that went against both the analyses prepared by EPA staff and the unanimous expert opinion of the Clean Air Scientific Advisory Committee (CASAC), EPA's panel of independent science advisors.

We thank EPA for restoring science's rightful place in the decision-making process and for proposing a more health-protective standard of between 0.060-0.070 ppm. Such a standard is consistent with the Clean Air Act's requirement to set standards that protect public health, including the health of children and people with pre-existing conditions, with a margin of safety.

Controlled human exposure studies of healthy adults have repeatedly demonstrated reduced lung function, increased respiratory symptoms, changes in airway responsiveness, and increased airway inflammation following 6.6 hour exposures to 0.08 ppm ozone. Other clinical studies demonstrate that some of the people tested experience these adverse effects at concentrations of 0.06 ppm and below. Multiple field studies have shown adverse health effects of ozone exposures below 0.075 ppm on children, especially worsening of respiratory status in asthmatics. In addition, many meta-analyses and primary national-scale epidemiological studies have documented consistent associations between premature mortality and ozone exposures below the current eight hour standard of 0.075 ppmⁱ.

Since the recommendation of the CASAC as well as the EPA Staff scientists in the Final Staff Paper, a follow-up report from the National Research Council has affirmedⁱⁱ EPA's assessmentⁱⁱⁱ of the evidence supporting the association between ozone and premature mortality as "robust and credible."

The unambiguous recommendations from EPA's independent scientific committee convened on this issue reflect the strong body of scientific literature indicating that retaining the current standard would put large numbers of people at risk for respiratory effects, asthma exacerbations, emergency room visits, hospital admissions, and mortality.

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We agree with the unanimous recommendation of the CASAC in supporting a range of 0.060 to 0.070 ppm for the primary ozone NAAQS, as outlined in a series of letters from CASAC to the EPA dated October 24, 2006^{iv}, March 26, 2007^v, and April 7, 2008^{vi}.

As such, we solemnly request that you continue following the path of science in protecting human health, heed the course charted by EPA's independent science advisory committee, and be guided by EPA's own professional staff in continuing the nation's critical race for healthier air.

Thank you for considering our views.

Sincerely,

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*Please refer to my testimony at the EPA hearing on Feb. 2, 2010 in Houston, TX supporting a 60ppb standard.

ⁱ http://www.epa.gov/ttnnaqs/standards/ozone/data/2007_07_ozone_staff_paper.pdf

ⁱⁱ National Research Council. 2008. Estimating Mortality Risk Reduction and Economic Benefits from Controlling Ozone Air Pollution. The National Academies Press:Washington DC.

http://www.nap.edu/catalog.php?record_id=12198

ⁱⁱⁱ U.S. Environmental Protection Agency. 2007. Ozone Staff Paper. Page 6-14.

^{iv} [http://yosemite.epa.gov/sab/sabproduct.nsf/AB290E0DB8B72A33852572120055858F/\\$File/casac-07-001.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/AB290E0DB8B72A33852572120055858F/$File/casac-07-001.pdf)

^v [http://yosemite.epa.gov/sab/sabproduct.nsf/FE915E916333D776852572AC007397B5/\\$File/casac-07-002.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/FE915E916333D776852572AC007397B5/$File/casac-07-002.pdf)

^{vi} [http://yosemite.epa.gov/sab/sabproduct.nsf/95eac6037dbec075852573a00075f732/4af8764324331288852574250069e494/\\$FILE/EPA-CASAC-08-009-unsigned.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/95eac6037dbec075852573a00075f732/4af8764324331288852574250069e494/$FILE/EPA-CASAC-08-009-unsigned.pdf)