

**Testimony on EPA's Proposed Rulemaking for  
"National Ambient Air Quality Standards for Ozone"  
Docket Number EPA-HQ-OAR-2005-0172**

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I'm Camille Kustin, with Environmental Defense Fund, a non-partisan, non-profit environmental organization with more than 700,000 members nationwide. Thank you for the opportunity to testify today.

EDF respectfully requests that the EPA and Administrator Jackson follow the unanimous recommendation of the Clean Air Scientific Advisory Committee and finalize the health-based National Ambient Air Quality Standard for ozone to protect vulnerable populations including children, the elderly, and the many across the nation and California who suffer from asthma. We request that the EPA set the standard for ozone at 60 parts per billion, the more protective end of the range. We also support a welfare-based standard for ozone that is anchored in biological sciences to provide increased protection against ozone-related adverse impacts on vegetation, forested ecosystems, and agricultural commodities.

We applaud the EPA and Administrator Jackson for choosing to listen to the recommendation of science and medical experts and reevaluate the decision to revise the ozone standard, as the current standard of 75 ppb is not supported by science and will continue to put large numbers of individuals at risk.

Looking specifically at California, tens of millions of residents throughout the state suffer from the impacts of poor air quality. More than 20,000,000 residents in the Los Angeles and San Joaquin Valley air basins alone face significant health risks and are paying the high economic costs of air pollution. We all deserve better. California's children deserve the chance to breathe clean air. Setting the ozone standard at 60 ppb will help grant that chance.

There is abundant evidence, and research continues to mount, that ozone contributes to premature mortality and a host of respiratory and lung ailments. Children, with their developing lungs, people with asthma, outdoor workers, and the elderly are most vulnerable to the impacts of ozone.

We have heard about the issue of cost. The true costs are the costs of doing nothing and retaining the 75 ppb standard.

A 2007 California State University, Fullerton study examined the costs of ozone and PM2.5 pollution to the Los Angeles air basin and the San Joaquin Valley, which contain some of the most polluted and most populated cities in the country. Between 2005 and 2007, ambient ozone levels in the San Joaquin Valley exceeded the 2007 8-hour ozone standard of 75 ppb on from 112 to 139 days a year, while in the South Coast Air Basin, exceedances occurred on from 115 to 120 days. If the 2007 ozone standard was met, the savings to the San Joaquin Valley would be more than \$88 million annually, and the savings to the South Coast air basin would be more than \$480 million annually, saving 50 lives and preventing at least 141,370 asthma attacks from the known asthmatic population.

These numbers are underestimates too, and do not account for how controlling ozone requires the lowering of chemical precursors such as NO<sub>x</sub> and VOCs, which contribute to the formation of PM 2.5. Thus, a critical co-benefit of lowered ozone levels is lowered particulate matter, which is linked to even more deaths than ozone and responsible for a host of respiratory problems.

The bottom line is that there is overwhelming evidence that ozone dramatically affects public health, can result in death, has an economic cost to our country, and overall impairs our natural environment and quality of life. Revisions to the standard could not come at a better time for California. Tens of millions of residents and children throughout the state suffer from the impacts of poor air quality. This is unacceptable. EDF respectfully asks that Administrator Jackson set the National Ambient Air Quality Standard for ozone at 60 ppb.

Thank you for your time.