



INDIANA BUILDERS ASSOCIATION

March 12, 2014

Dr. Holly Stallworth
Designated Federal Officer
Clean Air Scientific Advisory Committee - Ozone Review Panel

Via Electronic Mail
Re: Comments to CASAC on the Ozone NAAQS Policy Assessment

Dear Dr. Stallworth:

The Indiana Builders Association appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) reconsideration of the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. The Indiana Builders Association represents nearly 3,000 member companies engaged in the residential and light commercial construction industry.

Lowering the standard to 70 ppb – or even lower – could cause nearly the entire state to be in “nonattainment”. The science that the EPA is using to justify moving to this lower standard is also questionable and would unnecessarily cause severe economic impacts to our community and to our state. Changing these standards can have real impact on the nation's economy. The last time EPA considered tightening the ozone standards, even President Obama told EPA to stop working on the standards, citing the importance of reducing regulatory burdens and regulatory uncertainty, particularly as the economy continues to recover.

Given the severe economic impact that this could cause our state and the inconclusive health benefits of a lower standard, we respectfully request that CASAC recommend no change to the standard. If a change is warranted, then 75ppb should be within the range of a new standard. We believe this approach would better serve the interests of the public and support our nation's continued economic recovery.

Sincerely,

/s/

Rick Wajda
Chief Executive Officer