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March 4, 2014

Subject: Comments to the U.S. Environmental Protection Agency (EPA) Clean Air Scientific Advisory Committee (CASAC) on the Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards (NAAQS), Second External Review Draft

Dear Chairman Frey and CASAC Panel Members,

As CASAC reviews the Draft Policy Assessment please remember the ultimate use of this document. The Draft Policy Assessment contains the preliminary conclusions of the technical staff in the Office of Air Quality Planning and Standards (OAQPS). Your review will shape the final document, and while it is appropriate to comment on the science contained within, please be circumscribed about endorsing policy conclusions made by the technical EPA staff. The Final Policy Assessment will be a tool for the EPA Administrator when she issues a proposed rule regarding either retaining the existing NAAQS or taking comment on possible modifications to the NAAQS.

The final Policy Assessment should provide the best information possible for the Administrator. As science experts, CASAC, comments on the state of the science should include a true and fair representation of the uncertainty of the contained science findings. As a policy maker myself, I know all too well how much I want solid and known facts on which to base decisions. My experience had shown me that well-articulated augments of the facts, including a measure of confidence is very beneficial.

I am not a science expert, but as a concerned elected official I am an enthusiastic proponent of clean air for myself, my family, and my constituents. Ozone formation has been a longstanding focus of emission control, and, as you know, there has been a great deal of progress. I am heartened that that progress will continue, as EPA, in conjunction with states and localities, is only now starting to implement the 2008 Ozone NAAQS. Other regulatory initiatives are also projected to further reduce the emissions that contribute to ozone in the years ahead.

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My experience does tell me that the level of these NAAQS can make a significant impact in my community. A change in attainment status, due to a tightening of a NAAQS here Pennsylvania, could have a significant impact on the employment, wealth and quality of life for the residents. Those hardships can be adequately evaluated only against health improvements that are measurable and certain. Since all the facts are rarely available, here is where the of the EPA Administrator's job is difficult, and made more so when the health benefits are misclassified as counted and assured, when perhaps they are not.

I don't envy your responsibility, as the consequences of your review are serious. I know as scientists you will bring your knowledge to your deliberations, and I only ask you are clear in your letter to the EPA Administrator as to just how confident and determinate the evidence is that you cite.

In conclusion, I urge CASAC to clearly highlight to the EPA Administrator the uncertainty of the science and accept, however unsatisfying, the ambiguity inherent in the studies and experiments that make up the science record. I am sure you understand none of us are well served by a rush to change a NAAQS without compelling evidence and confidence.

Sincerely,

/s/

Scott E. Hutchinson
State Senator, 21st District

SEH/jnl

CC: Dr. Holly Stallworth, Designated Federal Officer