

## Stallworth, Holly

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**From:** Randy Zook <rzook@arkansasstatechamber.com>  
**Sent:** Wednesday, March 12, 2014 4:26 PM  
**To:** Stallworth, Holly  
**Subject:** NAAQS rules letter

Dr. Holly Stallworth  
Designated Federal Officer (DFO) for the Clean Air Scientific Advisory Committee (CASAC) Ozone Review Panel

Dr. Stallworth,

I am writing regarding our concerns over the Environmental Protection Agency's (EPA) reconsideration of the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. As I hope you know, lowering the standard to the EPA's suggested range of 60 to 70 ppb could cause practically the entire country to be in "nonattainment ". In fact, the standard would be so stringent that even remote wilderness areas, including the Grand Canyon and Yellowstone National Parks, would be in non-compliance.

If these proposed changes are implemented, businesses and industries will incur increased costs, permitting delays and restrictions on expansion, potentially prompting them to relocate out of the nonattainment area, taking much-needed revenue from the State. States that are struggling to recover from the crippling effects of the recession cannot afford to divert finite resources from job creation and economic development.

The current standard has improved air quality significantly over recent years and will surely continue to do so as we move toward full implementation. Between 1980 and 2012, total emissions of the six principal air pollutants have dropped by 67 percent. Since 1980, the measured ambient concentrations of ozone have dropped 25 percent. During this same period, gross domestic product has increased 133 percent, vehicle miles travelled increased 92 percent, energy consumption has increased 27 percent, and the U.S. population has grown by 38 percent. Any change in an ambient concentration set by a NAAQS standard must be "requisite" to protect human health or welfare, based on a review of updated scientific information. The range under consideration is controversial because there is no new scientific evidence to justify strengthening the standard from 75 ppb.

Given the severe economic impact this proposal will cause our state and the inconclusive health benefits of a lower standard, we respectfully request that any recommendations to EPA for the ozone standard include the "no change" option of maintaining the current 75ppb standard within the range of consideration. We believe this approach would better serve the interests of the public and support our nation's continued economic recovery.

Sincerely,

/s/

*Randy Zook  
President & CEO  
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