Stallworth, Holly

From: Edward Timmons <ETimmons@francis.edu>
Sent: Wednesday, March 12, 2014 3:10 PM
To: Stallworth, Holly
Subject: Comments to the EPA Clean Air Scientific Advisory Committee on the Policy Assessment for the Review of NAAQS

Dear Chairman Frey and CASAC Panel Members,

I reviewed the EPA report "Regulatory Impact Analysis: Final National Ambient Air Quality Standard for Zone." As a professionally trained economist, my eyes quickly made their way to Table S.1 on p. 6. The table presents a summary of cost-benefits studies of ozone exposure.

The costs to businesses of meeting a standard of 0.07PPM seems particularly large compared to the existing standards. Costs are projected to double—or even triple at the high-end of estimates. At the high-end of estimates, net benefit may double, but there are also many estimates suggesting significant net losses as a result of imposing stricter emission standards.

The existing standards (0.075) seem to have the right mix of protecting the public and not imposing harsh costs on businesses. A movement to 0.065 would be even further in the wrong direction—potentially quintupling the current cost to businesses.

Kind regards,
Edward Timmons
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