

**Stallworth, Holly**

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**From:** Lewellen, Sabrina <Sabrina.lewellen@Senate.Ar.Gov>  
**Sent:** Thursday, March 13, 2014 3:52 PM  
**To:** Stallworth, Holly  
**Cc:** Williams, Eddie Joe  
**Subject:** Comments to CASAC on the Policy Assessment for the Review of the Ozone NAAQS

Good Afternoon Dr. Stallworth:

Below is an important letter sent per the request of Senator Eddie Joe Williams, Senate Majority Leader of the Arkansas Senate.

Thank you,

Sabrina N. Lewellen, J.D.  
Deputy Director, Arkansas Senate  
Assistant Secretary of the Senate

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**Subject: Comments to CASAC on the Policy Assessment for the Review of the Ozone NAAQS**

Dear Chairman Frey and CASAC Panel Members,

I wish to offer comments on EPA's Draft Policy Assessment for the Review of the Ozone NAAQS that advises CASAC to consider recommending to the Administrator an ozone level in the 60-70 particles per billion ("ppb") range.

CASAC must be willing to balance the objective of improving public health with the impact more stringent ozone standards would have on local economies. It is no secret as local communities struggle, so does the health of its residents. In fact, the EPA studies used to support this proposed regulation were directed at protecting at-risk members of our population while past EPA studies supported a 75 ppb level. It would be overly burdensome to these at-risk members of our population for them to suffer further deterioration of their local communities as a result of an arbitrary change in the ozone NAAQS.

The EPA's Draft Policy Assessment does not take into account the reductions in ozone levels as a direct result of existing regulations and those yet to take effect. Specifically, there has been a decline in the overall concentration level of criteria pollutants for ozone of 25 percent in the past 20 years. These improvements in ozone levels will continue to come from the 75 ppb standard that was enacted in 2008. Counties and states need some predictability in order to develop long-range plans to achieve ozone reduction. Pushing the goalpost back denies state and local entities the time and flexibility needed to implement already existing ozone standards and requires them to return to the drawing board to develop new plans. Cities and states and the businesses therein spent considerable amounts of time and money to accommodate a 75 ppb level and estimates place the cost of reaching a range of 60-70 ppb at \$918m for Arkansas alone.

In conclusion, I urge CASAC to take notice of the current progress that has been and will continue to be made in cutting the overall levels of ozone and to balance this with the risk of harm to local communities. I remain committed to helping achieve a cleaner environment through the continuation of proven technological and regulatory efforts, but done at the current standard of 75 ppb. For these reasons, I strongly urge that any recommendation to EPA to tighten the ozone standard should, at a minimum, include the 75 ppb standard within the range of consideration.

Sincerely,

Senator Eddie Joe Williams  
Senate Majority Leader  
District 29