

Stallworth, Holly

From: Steve Bisenius [REDACTED]
Sent: Thursday, March 13, 2014 4:03 PM
To: Stallworth, Holly
Subject: Comments to CASAC on the Ozone NAAQS Policy Assessment

Dear Chairman Frey and CASAC Panel Members,

I would like to respectfully submit comments about the Environmental Protection Agency's (EPA) proposed amending of the National Ambient Air Quality Standard (NAAQS) for ground level ozone. As Executive Director for an organization that works very closely with existing industries and prospective industries, on a daily basis, we are very concerned the impact these new standards will have on the industries in Lee County, and their ability to remain operating. As Lee County has the highest unemployment rate in Iowa, we have deep concern that such new standards could further worsen our unemployment rate.

It is my understanding that nearly the entire nation would not be able to qualify under the new standard if it were to be lowered from the 2008 mark. Included in those areas are thousands of businesses, rural and undeveloped lands, as well as invaluable areas such as the Grand Canyon and Yellowstone National Park. If unable to meet the new emission requirements these businesses would be halted from expanding or forced to shut down.

We feel that the science behind this proposal is not the most accurate of research. The studies conducted by the EPA that found a link between high ozone levels and respiratory problems did not factor in variables such as smoking that could and do impact people's respiratory systems.

The EPA's 2008 standard of 75 parts per billion (ppb) was deemed to sufficiently protect human health with a margin of safety by a federal court just last year. This causes me to question the science that EPA is using to justify reducing the ozone levels, especially when it would have such a detrimental impact on the economy. In Iowa alone, all 22 counties monitored by the National Association of Manufacturers were found to be out of attainment for a 60 ppb standard and only two were below 65 ppb. More than 100,000 Iowans are employed in manufacturing, natural resources, mining, and construction industries in these counties.

Considering the severity this change would incur on Iowa and the inconclusive findings to support its implementation, I respectfully request that the CASAC advise that the ozone range remain at 75 ppb.

Sincerely,

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