

Stallworth, Holly

From: james greco [REDACTED]
Sent: Wednesday, March 12, 2014 1:01 PM
To: Stallworth, Holly
Subject: Proposed Ozone standards

Dear Chair Frey and CASAC Panel Members

Air quality in the U.S.A. has improved significantly over the last decade. I believe this improvement will continue without promulgating stricter Ozone NAAQS standards.

I believe some background information on my training will help place my comments in context. I have a Ph.D. in Ecology and am active in several conservation organizations in Pennsylvania. I am Chair of the Cambria and Somerset Conservancy and an Associate Director of the Cambria County Conservation District. I am also a former Director of the Southern Alleghenies Conservancy. Additionally I have served as Chair of the Johnstown Industrial Development Corporation for 11 years and am a former officer in Johnstown Area Regional Industries. These two organizations are the major economic development agencies in our region of Pennsylvania. I mention these affiliations to impress upon you that I am a conservationist, understand the issue of Ozone pollution and have significant experience in economic development.

Obviously sensible government regulations are necessary to protect the safety and health of our citizens. I believe the 2008 standards are just that, sensible regulations. Further tightening of the NAAQS for ozone will have a marginal impact on ground level concentration but at the same time will have major economic impacts on small and large industries. In fact, I fear they could conceivably bring job creation and economic growth to a halt. Even rural and undeveloped areas will face significant hurdles with respect to job creation and economic development. I believe in some cases these proposed standards are actually below peak background levels. That is, below naturally occurring ozone levels since ozone is a naturally condition in our environment.

Another problem I see is that EPA and most states have not yet, to the best of my knowledge, developed plans to achieve the 2008 standards. It would be prudent to wait until these plans are in place, measure ozone concentrations and then consider the need for stricter standards.

This would be a scientifically valid approach to protect the health and safety of our citizens. Therefore I urge any recommendations for stricter ozone standards be delayed.

Cordially,

James L. Greco, Ph.D.