

**TFAH Statement for EPA Clean Air Scientific Advisory Committee (CASAC)
Friday, February 18, 2011
Teleconference**

Good afternoon, members of the Clean Air Scientific Advisory Committee. My name is Jack Rayburn and I would like to offer this statement on behalf of Trust for America's Health. Thank you for providing the opportunity to offer our perspectives on this important topic.

TFAH is a nonprofit, nonpartisan public health advocacy organization dedicated to saving lives by making disease prevention a national priority.

In our minds, the Clean Air Act is federal law that was enacted to protect public health and prevent disease, illness, and premature death. This committee and many others in the scientific community have already made prior determinations that, based on the latest scientific evidence, the current standard for ground ozone levels fails to achieve this basic purpose.

As a result, we believe strongly that EPA should move forward with a new ground ozone National Ambient Air Quality Standard without delay. In our view, setting the standard at 60 parts per billion (ppb) averaged over eight hours affords us the best opportunity to save lives and improve quality of health and life for Americans. By EPA's own estimates, meeting a standard of 60 ppb will save up to 12,000 lives a year.

We note that there has been considerable discussion as to where in the proposed "range" (60 to 70 ppb) to set the standard in order to protect health. We respectfully note that the Clean Air Act requires CASAC to adopt an "ample margin of safety" in setting primary standards for criteria pollutants like ground ozone. Because smog is particularly harmful to vulnerable sub populations, particularly children, older adults, and low-income Americans, which often includes racial and ethnic minorities, we believe strongly that setting the standard at the lower end of the range, at 60 ppb, offers us the best opportunity to prevent chronic disease and protect those who are already suffering and creates this "margin of safety" that the law requires.

It is time to take action and do what we know is required. Again, we urge you to place the new ground ozone National Ambient Air Quality Standard at 60 parts per billion (ppb) averaged over eight hours to protect public health and save lives.

Thank you again for the opportunity to provide these comments.