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***Improving Life,
One Breath at a Time***

**Testimony of
Christine L. Bryant
Board of Directors
American Lung Association**

**on
EPA's Proposed Revisions
to the**

National Ambient Air Quality Standards for Ozone

72 FR 37818

**To the U.S. Environmental Protection Agency
Docket NO. EPA-HQ-OAR-2005-0172**

**August 30, 2007
Los Angeles, California**

Good morning. My name is Christine Bryant and I'm here today representing the Board of Directors for the nationwide American Lung Association. I currently serve as Secretary of the Board, and I have been a volunteer for the Lung Association for nearly twenty years.

The American Lung Association is one of the nation's oldest voluntary health organizations. Our mission is to protect lung health and prevent lung disease. Fighting for clean air—healthy air—is central to that mission. You are here today because five years ago, in our continued commitment to that fight, we took legal action to require this review.

The American Lung Association calls on EPA to adopt a primary national ambient air quality standard for ozone of 0.060 parts per million averaged over eight hours. While the range you have proposed is a major improvement on the existing standard, it falls short of what is needed. The health—indeed the lives—of too many people are at stake.

The Clean Air Act requires EPA to set a standard that protects public health with an adequate margin of safety. What does that mean, really—“to protect public health with a margin of safety”? How does the EPA provide that protection?

First, we believe that it means that EPA should follow the advice of the 23 distinguished and independent air pollution experts who form the EPA's Clean Air Scientific Advisory Committee. They gave unprecedented unanimous support for much tighter standards than EPA has proposed. .

Last October, the scientists on the Committee sent its official recommendations to EPA in a letter that was both explicit and pointed. The Committee warned that the ozone smog standard “needs to be substantially reduced” and that there is “no scientific justification” for retaining the current, weaker standard. The Committee recommended a range for the standard of 0.060 to 0.070 parts per million, a range that would provide much more protection than the EPA

recommendations before us. Unfortunately, the tightest new standard proposed barely touches the levels the scientists recommended.

No doubt about it: the proposed range is better than what we have now. Even a standard set at 0.075 parts per million would lead to much less ozone pollution across the nation. But the Clean Air Act doesn't direct EPA to just "do better." The Clean Air Act demands that you protect the health of the public. "Cleaner" air is not clean enough.

EPA argued in the proposal that the "uncertainty" of the research keeps you from tightening the standard to the level that the Lung Association recommends. "Uncertainty" is to be expected in research—in fact, the Congress recognized that reality in 1970 when it added the requirement to include a "margin of safety" in the standard. So any uncertainty should compel you to tighten the standard to cover that margin the Clean Air Act requires. Clearly, the 23 independent scientists all felt the evidence was compelling enough.

The proposal also leaves open a completely unacceptable option—that of making no improvements in the standards at all by retaining the current standard. In doing so, the EPA would ignore a decade of compelling research that points to even more harm from ozone pollution. We cannot wait until another decade passes to provide this protection.

Ozone air pollution poses health risks for infants, children, seniors, and people with asthma and other lung diseases. For these people, smog-polluted air means more breathing problems, aggravated asthma, hospital visits and even premature death. Even healthy adults who work or exercise outdoors are at risk. In our written comments we will discuss the scientific evidence for a stronger ozone standard with more specifics.

But I wanted to be here today because this is personal. I'm a lifelong resident of Southern California. Members of my family are at risk. My mother lives in San Diego and

suffers from borderline emphysema. She was forced to move from Los Angeles in the early 70's because the pollution levels at that time made her condition worse. Today, she continues to cough and wheeze and struggles to breathe throughout the year because of the ozone blanket that covers us. On the days when pollution levels are increased it becomes even harder for her to catch her breath and walk. And now we learn that the levels of ozone she's breathing may actually be shortening her life. Ozone isn't some abstract problem for us. It means my mother's life.

The science is clear. The law is clear. EPA has a legal requirement to set the standard where it protects the health of the public—including vulnerable people like my mother—with a margin of safety. The revised ozone smog standards that EPA is now proposing are a step toward that goal—but they do not go far enough. “Part-way there” is not good enough. On behalf of the American Lung Association, I urge you to adopt a substantially stronger ozone standard that follows the law and the science. Quite literally, my mother's health and the health of millions of others depend on you.

I will leave you today with a statement that says it all from the American Lung Association: **When you can't breathe, nothing else matters.**