

**Statement before OMB re: proposed maintenance of Ozone NAAQS at current levels :: December 18, 2020**

Hello, my name is Ulla Reeves. I am the Senior Advocacy Manager with National Parks Conservation Association in our Clean Air Program.

NPCA is a nationwide organization with roughly 1.3 million members and supporters who care deeply about the health and well-being of our nation's most treasured natural areas and historic resources as well as the health of all Americans and those who chose to recreate in and enjoy our national parks.

Earlier this year, we expressed our deep concerns directly to EPA about their plans to retain the existing primary National Ambient Air Quality Standards for ozone because that decision fails to consider the current science that shows stronger standards are necessary to protect public health. Furthermore, we are deeply frustrated that yet again, despite court orders telling EPA to set a distinct and separate secondary standard, EPA has failed to fully consider the science and the advice of true scientific experts regarding the harm to ecosystems from ozone and instead moved forward without any intention or willingness to actually protect the public welfare.

NPCA speaks on behalf of our national parks and our parks and natural ecosystems are long overdue for the consideration they should be given according to the intention of the Clean Air Act to ensure that public welfare – meaning nature and ecosystems – is adequately protected through the setting of a distinct, stronger secondary standard. **To this end, we do not believe that OMB ought to be finalizing this rule. It is incomplete and fails to fully address the issues that it ought to.**

Furthermore, it is OMB's responsibility to ensure that economic issues have been fully addressed and vetted in advancing a rule. Failing to strengthen the public health portion of the standard directly relates to the public health crisis that we are seeing rage out of control in this nation right now. Ozone is a dangerous pollutant for humans to breathe and exposure to air pollution weakens people's lungs, making the COVID pandemic even worse for some people and further

exacerbating economic losses. I will speak more to the economic considerations of the outdoor economy and air quality in a minute.

In 2018, the EPA found that more than 95 of America's national parks are failing to meet current federal limits set only for public health for ozone pollution. These parks include Cuyahoga National Park in Ohio and Sequoia Kings Canyon in California (just to name a few), where ozone regularly threatens the health of park visitors. But we know that nature – plants, trees and animals – don't get to escape indoors like people do. They are exposed regularly day in and day out to these harmful ozone levels, especially during the summer ozone season, that contribute to the disease and death of park species such as the black cherry tree and tulip poplar in the East and aspen and ponderosa pine in the West. National park ecosystems across the country are suffering the damages from ground-level ozone pollution and need even better protections than people do because they are more sensitive and exposed for longer hours. Now more than ever, we need our forests and parks to remain healthy and growing strong as we look for ways to store carbon and adapt to rapidly changing temperatures and weather patterns to address climate change with resilient, healthy ecosystems.

The current averaging time used to set the primary standard at 70ppb works for considering public health but is inadequate to suffice for the secondary standard because of how ozone uniquely affects plants and ecosystem services. Keeping the standard where it is will result a threefold increase in biomass loss as the health of plants and trees suffer across the nation.

The collective effects of ozone pollution on our ecosystems are extensive and deeply problematic for the health of our natural places in this nation – places that bring in enormous economic benefits to surrounding communities.

- According to the Department of Interior, in 2019, visitor spending in communities near national parks resulted in a \$41.7 billion benefit to the nation's economy and supported over 340,000 jobs. Visitor spending increased by \$800 Million from 2018 to 2019 and the overall effect on the U.S economy grew by \$1.6 billion.

- The Outdoor Industry Association found that consumer spending related to the outdoor recreation economy generates 5.2 Million direct jobs nationally and generates nearly \$800 Billion in consumer spending.
  - These statistics correlate again to the DOI findings that showed in the last five years visitor spending has increased by \$4 Billion and the overall effect on the U.S. economy grew by over \$9 Billion.
- How do these numbers relate to air pollution you might ask?
  - A 2018 report on U.S. national park visitation found that visitation drops by at least eight percent when ozone pollution is high.
  - Yet another study about air quality in the Great Smoky Mountains National Park showed that just a 5 percent increase in visibility range results in an approximate increase of half a million annual visits to the park.
- People pay attention to clean, healthy air and stunning views both inside and outside parks and the dollars don't lie. If we clean up ozone pollution, people's health benefits, visibility improves and there are tremendous economic benefits to be reaped.

In conclusion, EPA has quite simply not done their job to review the full landscape of science that clearly shows that stronger limits are needed to protect public health and public welfare. **We called on EPA to follow the science and update the ozone health standard. We called on the EPA to listen to scientists with expertise in ozone effects on crops and forests. We called on EPA to follow the science and set a unique and separate standard to protect ecosystems and natural resources. None of these things happened. So now we call on you at OMB to fully analyze the economic harms of what failing on all of these fronts means to the American people and our economy. And we call on you to stop advancement of this rule so that these issues and considerations can be fully evaluated.**

Thank you.