



MAY 11 2012

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Dear Administrator Jackson:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the US EPA on a wide range of issues of interest and concern to local governments. More specifically, the LGAC is particularly grateful to have the opportunity to comment on the ongoing review of ozone standards especially in regard to ozone as an increased health risk to environmental justice communities.

The LGAC acknowledges its previous letter, dated February 8, 2012, regarding EPA's review of the 2008 ozone standard. Pursuant to the LGAC's charter we offer these further, following comments and recommendations, in addition to the recommendations stated in the previous letter, regarding a further review of ozone limits, as well as the effects of ozone on environmental justice communities.

The LGAC's foremost concerns are the grave effects of ozone. **The LGAC recommends a review of ambient air quality and ozone limits so that communities do not continue to experience adverse health effects because of ozone.** Exposure to ozone can lead to premature death in populations that are *not* already gravely ill. Improved air quality yields a direct positive impact on those with various levels of health, and vulnerable populations. The LGAC anticipates the five-year review of the ozone standards for 2013 and looks forward to its continued work with the Agency on this effort.

The LGAC further recommends the EPA continue its efforts to fully incorporate the social determinates and cumulative risks that also impact a response to environmental exposure, so that the dose response exposure matrix to environmental risks is not solely based on chemical dose response. More dialogue and research is required but these stressors, social determinants and cumulative risks should be a factor when you consider exposure.

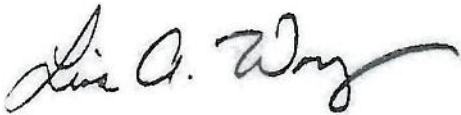
This is especially important when you consider environmental justice communities and vulnerable populations. The LGAC has reviewed and considered recent activities regarding ozone effects on at-risk communities, and that social determinants can affect health as well as chemical and physiological aspects. **The LGAC recommends that EPA consider this when reviewing the ozone standard so as to mitigate effects of ozone on high risk population groups.**

Thank you for the opportunity to comment, and we look forward to working with the EPA on these recommendations.

Sincerely,



The Honorable Heather McTeer
Chairwoman



The Honorable Lisa Wong
Chairwoman, Expanding the
Conversation (EJ) workgroup



The Honorable Salud Carbajal
Chairman, Air, Climate and Energy
Workgroup