With respect to commercial production of commodities, however, the

Administrator notes that judgments about the extent to which O<sub>3</sub>-related effects on
commercially managed vegetation are adverse from a public welfare perspective are
particularly difficult to reach, given that what is known about the relationship between O<sub>3</sub>
exposures and agricultural crop yield response derives largely from data generated almost
20 years ago. The Administrator recognizes that there is substantial uncertainty at this
time as to whether these data remain relevant to the majority of species and cultivars of
crops being grown in the field today. In addition, the extensive management of such
vegetation may to some degree mitigate potential O<sub>3</sub>-related effects. The management
practices used on these lands are highly variable and are designed to achieve optimal
yields, taking into consideration various environmental conditions. Thus, while the
Administrator believes that a secondary standard revised to provide protection for
sensitive natural vegetation and ecosystems would likely also provide some degree of
additional protection for heavily managed commercial vegetation, the need for such
additional protection is uncertain.

Based on these considerations, and taking into consideration the advice and recommendations of CASAC, the Administrator concludes that the protection afforded by the current secondary O<sub>3</sub> standard is not sufficient and that the standard needs to be revised to provide additional protection from known and anticipated adverse effects on sensitive natural vegetation and sensitive ecosystems, and that such a revised standard would also be expected to provide additional protection to sensitive ornamental vegetation. The Administrator also concludes that there is not adequate information to establish a separate secondary standard based on other effects of O<sub>3</sub> on public welfare. It

Deleted: Furthermore, the Administrator also agrees with the CASAC Panel and the Staff Paper conclusions that in revising the secondary standard to provide increased protection it is appropriate to establish a secondary standard that is distinct from the primary standard in that it is based on a biologically relevant form. The Administrator finds the evidence is compelling that O3-related effects on vegetation are best characterized by an exposure index that is cumulative and seasonal in nature, and that revising the current standard in part by adopting such a form is both necessary and appropriate to ensure a requisite degree of protection 1

**Deleted:** Further, the Administrator concludes that to provide adequate protection, the standard should be revised by establishing a distinct secondary standard with a cumulative, seasonal form that is biologically relevant to O<sub>3</sub>-related effects.