

August 13, 2015

Mr. Denis McDonough
Chief of Staff
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. McDonough:

As associations representing many businesses, both large and small, that employ millions of Americans, and local governments in which those businesses thrive, we are deeply concerned about the harmful impact that the Environmental Protection Agency's (EPA) recently proposed rule to make ozone standards more stringent could have on the still struggling economy. The EPA's current regulations are working, air quality continues to improve, and the United States is leading the world in reducing emissions. New ozone standards could significantly damage the economy by imposing unachievable emissions limits and reduction targets on almost every part of our country, including rural and undeveloped areas. Therefore, we strongly urge you to retain the current ozone standards when finalizing this proposal.

We all value clean air. The managers and employees of the companies we represent, as well as their families, all breathe the same air. We are proud that emissions of ozone-forming compounds have been cut in half since 1980, leading to a 33% drop in ozone concentrations. Moreover, EPA just updated ozone standards six years ago. These current standards are behind schedule due to EPA effectively suspending their implementation from 2010-2012 while the Agency unsuccessfully pursued reconsideration. This country can expect to see even greater reductions in ground-level ozone as states make up lost ground in putting the current standards into effect.

Indeed, states are currently committing substantial resources – both in time and money – towards achieving emissions reductions under those current ozone standards. Yet despite over three decades of cleaner air and before states can catch up with EPA's delays in implementing existing ozone standards, EPA is now proposing a new stringent range of standards from 70 to 65 parts per billion that would bring vast swaths of the country into nonattainment. Local communities could face burdens to commercial and industrial activity not only vital to creating jobs, but also to providing tax revenue that supports important local services like public safety and education. This proposal's hardship to the American worker could be real and immediate. Furthermore, approximately half of the states across the nation have already indicated their concerns with this proposal.

Mr. Denis McDonough

August 13, 2015

Page 2

If finalized, EPA's proposed stringent ozone standards could limit business expansion in nearly every populated region of the United States and risk the ability of U.S. companies to create new jobs. Standards in EPA's proposed range would immediately add red tape to companies seeking to grow even in areas that can attain those standards. The Clean Air Act carries even stiffer consequences for nonattainment areas, directly impacting economic vitality of local communities and making it difficult to attract and develop business. Increased costs associated with restrictive and expensive permit requirements could likely deter companies from siting new facilities in a nonattainment area. Making the United States a less attractive place to do business in this way risks shipping jobs overseas.

Companies building a new facility or performing major modifications to certain existing facilities resulting in increased ozone concentrations in, or near, a nonattainment area will be required to meet the most stringent Clean Air Act standards by installing the most effective emission reduction technology regardless of cost. As well, states are mandated to offset any ozone-forming emissions from new projects or projects undergoing major modifications by reducing emissions from other existing sources in a nonattainment area. If no party is willing to provide offsets, then the project cannot go forward. This offset requirement can be a 2-to-1 ratio in certain situations. Nonattainment designation also has profound impact on infrastructure development vital to the business community. Beginning one year from the date of the nonattainment designation, federally-supported highway and transit projects cannot proceed in a nonattainment area unless the state can demonstrate that the project will cause no increase in ozone emissions.

These restrictions do not disappear when an area finally comes into attainment. Instead, former nonattainment areas face a legacy of EPA regulatory oversight. Before a nonattainment area can be redesignated to attainment, EPA must receive and approve an enforceable maintenance plan for the area that specifies measures providing continued maintenance of ozone standards and contingency measures to be implemented promptly if an ozone standard is violated.

Against these economic consequences, scientific uncertainties regarding the benefits of more stringent ozone standards are significant. Indeed, stringent ozone standards may have severe unintended consequences for public health. Studies show that by increasing the costs of goods and services such as energy, and decreasing disposable incomes, regulation can inadvertently harm the socio-economic status of individuals and, thereby, contribute to poor health and premature death. As representatives of businesses employing needed jobs in our communities, as well as the community leaders themselves, we believe these scientific uncertainties should be better explored in order to best allocate resources in a manner that strengthens both the economy and the environment.

Mr. Denis McDonough

August 13, 2015

Page 3

The air is getting cleaner and the current ozone standards need an opportunity to work. Therefore, in light of the potential economic hardship, and uncertain benefits related to the stringent ozone standards that EPA is now considering, we call on EPA to retain the existing ozone standards in the final rule.

Sincerely,

Alabama

Alabama Petroleum Council
Business Council of Alabama
Coalbed Methane Association of Alabama
Manufacture Alabama
Petroleum & Convenience Marketers of Alabama
U.S. Oil & Gas Association Mississippi/Alabama Division

Arkansas

AGC Arkansas
Agricultural Council of Arkansas
Arkansas Beverage Association
Arkansas Asphalt Pavement Association
Arkansas Automobile Dealers Association
Arkansas Cattlemen's Association
Arkansas Environmental Federation
Arkansas Farm Bureau
Arkansas Forest and Paper Council
Arkansas Forestry Association
Arkansas Grocers and Retail Merchants Association
Arkansas Hospitality Association
Arkansas Independent Producers and Royalty Owners Association
Arkansas Oil Marketers Association
Arkansas Petroleum Council
Arkansas Ready Mixed Concrete Association
Arkansas State Chamber of Commerce/Associated Industries of Arkansas
Arkansas Timber Producers Association
Arkansas Trucking Association
Associated Builders and Contractors of Arkansas

Colorado

Club 20
Colorado Petroleum Council
Colorado Association of Commerce and Industry
Colorado Association of Conservation Districts
Colorado BUILDS

Mr. Denis McDonough

August 13, 2015

Page 4

Colorado Dairy Farmers
Colorado Farm Bureau Federation
Colorado Mining Association
Colorado Motor Carriers Association
Colorado Oil and Gas Association
Colorado Petroleum Association
Colorado Ready Mixed Concrete Association
Colorado Stone, Sand and Gravel Association
Colorado Wyoming Petroleum Marketers Association
Grand Junction Chamber
Western Energy Alliance

Connecticut

Connecticut Petroleum Council

Delaware

Delaware State Chamber of Commerce
Delaware Manufacturers Association

Florida

Asphalt Contractors Association of Florida
Associated Builders and Contractors of Florida
Associated Industries of Florida
Florida Automobile Dealers Association
Florida Chamber of Commerce
Florida Energy Pipeline Association
Florida Forestry Association
Florida Natural Gas Vehicle Coalition
Florida Petroleum Council
Florida Petroleum Marketers and Convenience Stores Association
Florida Restaurant and Lodging Association
Florida Transportation Builders Associations
Floridians for Better Transportation
Home Builders Association of West Florida
James Madison Institute
Manufacturers Association of Florida

Georgia

Associated General Contractors of Georgia
Georgia Agribusiness Council
Georgia Asphalt Pavement Association
Georgia Association of Convenience Stores
Georgia Association of Manufacturers

Mr. Denis McDonough

August 13, 2015

Page 5

Georgia Chamber of Commerce
Georgia Chemistry Council
Georgia Construction Aggregate Association
Georgia Electric Membership Corporation
Georgia Farm Bureau
Georgia Food Industry Association
Georgia Highway Contractors Association
Georgia Mining Association
Georgia Motor Trucking Association
Georgia Oilmen's Association
Georgia Paper and Forest Products Association
Georgia Petroleum Council
Georgia Poultry Federation
Georgia Railroad Association
Georgia Ready Mixed Concrete Association
Metro Atlanta Chamber
Oglethorpe Power Corporation

Iowa

American Council of Engineering Companies of Iowa
Associated General Contractors of Iowa
Iowa Engineering Society
Iowa Good Roads Association
Iowa Motor Truck Association
Master Builders of Iowa
Society of Land Surveyors of Iowa

Illinois

Chemical Industry Council of Illinois
Grain and Feed Association of Illinois
Illinois Asphalt Pavement Association
Illinois Association of Aggregate Producers
Illinois Association of Convenience Stores
Illinois Chamber of Commerce
Illinois Coal Association
Illinois Environmental Regulatory Group
Illinois Farm Bureau
Illinois Manufactures Association
Illinois Oil and Gas Association
Illinois Petroleum Council
Illinois Petroleum Marketers Association
Illinois Retail Merchant Association
Illinois Trucking Association
Mid-West Truckers Association

Mr. Denis McDonough

August 13, 2015

Page 6

Indiana

Agribusiness LLC

APPIAN

Construction Advancement Foundation of Northwest Indiana, Inc.

CountryMark

Greater Elkhart Chamber of Commerce

H&C Climate Control

Indiana Association of Cities and Towns

Indiana Association of Counties

Indiana Builders Association

Indiana Cast Metal Association

Indiana Chamber of Commerce

Indiana Coal Council

Indiana Electric Cooperatives

Indiana Farm Bureau

Indiana Grocery and Convenience Store Association

Indiana Manufacturers Association

Indiana Motor Truck Association

Indiana Oil and Gas Association

Indiana Petroleum Council

Indiana Petroleum Marketers and Convenience Store Association

Indiana Retail Council

Indiana Utility Shareholders Association

Indianapolis Chamber of Commerce

Kosciusko Chamber of Commerce

Northwest Indiana Forum

One Zone (Carmel and Fishers Chambers of Commerce)

Southwest Indiana Chamber

Kansas

Greater Kansas City Chamber of Commerce

Kansas Agribusiness Retailers Association

Kansas Chamber of Commerce

Kansas Ethanol Processors Association

Kansas Farm Bureau

Kansas Grain & Feed Association

Kansas Independent Oil & Gas Association

Kansas Industrial Council

Kansas Petroleum Council

Sunflower Electric Power Corporation

Wichita Metro Area Chamber of Commerce

CVR Energy

Mr. Denis McDonough

August 13, 2015

Page 7

Kentucky

Kentucky Association of Manufacturers

Kentucky Chamber of Commerce

Kentucky Chemical Industry Council

Kentucky Farm Bureau

Kentucky League of Cities

Kentucky Oil & Gas Association

Maine

Maine State Chamber of Commerce

Maryland

Maryland Chamber of Commerce

Maryland Coal Association

Maryland Farm Bureau

Maryland Highway Users Federation

Maryland Motor Truck Association

Maryland Petroleum Council

Maryland Retailers Association

Maryland Transportation Builders and Materials Association

Mid-Atlantic Petroleum Distributors Association

Service Station Dealers of America and Allied Trades

Tire Industry Association

WMDA Service Station and Automotive Repair Association

Massachusetts

Independent Oil Marketers Association of New England

Massachusetts Energy Marketers Association

Massachusetts Petroleum Council

Retailers Association of Massachusetts

Michigan

Associated Food and Petroleum Dealers

Associated Petroleum Industries of Michigan

Detroit Regional Chamber of Commerce

Grand Rapids Chamber of Commerce

Michigan Building and Construction Trades Council

Michigan Chemistry Council

Michigan Electric and Gas Association

Michigan Farm Bureau

Michigan Laborers Union

Michigan Manufacturers Association

Mr. Denis McDonough

August 13, 2015

Page 8

Michigan Oil and Gas Association

Michigan Petroleum Association

Michigan Trucking Association

Minnesota

Minnesota Agri-Growth Council

Minnesota Petroleum Marketers Association

Cooperative Network of Minnesota

Minnesota Trucking Association

Minnesota Petroleum Council

Minnesota Chamber of Commerce

Missouri

American Council of Engineering Companies of Missouri

ASA-Midwest Council

Associated General Contractors of Missouri

Associated Industries of Missouri

Association of Missouri Electric Cooperatives

Chemistry Council of Missouri

County Commissioners Association of Missouri

Mining Industry Council of Missouri

Missouri Agribusiness Association

Missouri Asphalt Pavement Association

Missouri Association of Counties

Missouri Chamber of Commerce

Missouri Chapter of Freedom of the Road Riders

Missouri Concrete Association

Missouri Energy Development Association

Missouri Farm Bureau

Missouri Forest Products Association

Missouri Grocers Association

Missouri Limestone Association

Missouri Municipal League

Missouri Petroleum Council

Missouri Petroleum Marketers & Convenience Store Association

Missouri Public Utility Alliance

Missouri Retailers Association

Missouri Society of Professional Engineers

Missouri Transportation & Development Council

Missouri Trucking Association

North East County Commissioners Association of Missouri

North West County Commissioners Association of Missouri

Regulatory Environmental Group for Missouri

SITE Improvement Association

South Central County Commissioners Association of Missouri

Mr. Denis McDonough

August 13, 2015

Page 9

South East County Commissioners Association of Missouri
South West County Commissioners Association of Missouri
St. Louis Building & Construction Trades Council
West Central County Commissioners Association of Missouri

Nebraska

Nebraska Farm Bureau Federation
Nebraska Petroleum Marketers & Convenience Store Association
Nebraska Petroleum Producers Association
Nebraska Rural Electric Association
Nebraska State Chamber of Commerce & Industry

New Jersey

Chemistry Council of New Jersey
New Jersey Business & Industry Association
New Jersey State Chamber of Commerce
New Jersey Association of Counties
New Jersey Environment & Economic Development
New Jersey Petroleum Council

New York

Associated General Contractors of New York
Business Council of New York State
New York State Petroleum Council

North Carolina

Associated Builders and Contractors of the Carolinas
Carolinas Associated General Contractors
North Carolina Aggregates Association
North Carolina Chamber
North Carolina Farm Bureau
North Carolina Forestry Association
North Carolina Homebuilders Association
North Carolina Manufacturers Alliance
North Carolina Petroleum & Convenience Marketers Association
North Carolina Petroleum Council
North Carolina Retail Merchants Association

North Dakota

Associated General Contractors of North Dakota
Bismarck-Mandan Chamber of Commerce
Greater North Dakota Chamber of Commerce

Mr. Denis McDonough

August 13, 2015

Page 10

Lignite Energy Council
North Dakota Association of Rural Electric Cooperatives
North Dakota Petroleum Council
North Dakota Petroleum Marketers Association
North Dakota Propane Gas Association
North Dakota Retail Association
Utility Shareholders of North Dakota

Ohio

API Ohio
Canton Regional Chamber of Commerce
International Union of Operating Engineers, Local 18
Ohio Aggregates and Industrial Minerals Association
Ohio Chamber of Commerce
Ohio Chemistry Technology Council
Ohio Coal Association
Ohio Contractors Association
Ohio Gas Association
Ohio Grocers Association
Ohio Home Builders Association
Ohio Licensed Beverage Association
Ohio Manufacturers' Association
Ohio Municipal League
Ohio Oil and Gas Association
Ohio Petroleum Marketers and Convenience Store Association
Ohio Rural Electric Cooperatives
Ohio Spirits Association
Ohio Trucking Association
Plumbers & Pipefitters Local 396
Southeastern Ohio Oil and Gas Association
Youngstown Warren Regional Chamber

Oklahoma

State Chamber of Oklahoma
Tulsa Chamber of Commerce

Pennsylvania

Associated Pennsylvania Constructors
Associated Petroleum Industries of Pennsylvania
Chester County Chamber of Business and Industry
Greater Johnstown/Cambria County Chamber of Commerce
Greater Philadelphia Chamber of Commerce
Greater Philadelphia Hispanic Chamber of Commerce
Greater Pittsburgh Chamber of Commerce

Mr. Denis McDonough

August 13, 2015

Page 11

Manufacturer and Business Association
Marcellus Shale Coalition
Maritime Exchange for the Delaware River and Bay
Pennsylvania Aggregates and Concrete Association
Pennsylvania Asphalt Pavement Association
Pennsylvania Business Council
Pennsylvania Chamber of Business and Industry
Pennsylvania Chemical Industry Council
Pennsylvania Coal Alliance
Pennsylvania Farm Bureau
Pennsylvania Food Merchants Association
Pennsylvania Forest Products Association
Pennsylvania Independent Oil and Gas Association
Pennsylvania Manufacturers Association
Pennsylvania Motor Truck Association
Pennsylvania Petroleum Association
Pennsylvania Waste Industries Association

Rhode Island

The Energy Council of Rhode Island
Northern Rhode Island Chamber of Commerce
Rhode Island Hospitality Association
Rhode Island Manufacturers Association
Rhode Island Small Business Economic Summit
Rhode Island Society of Certified Public Accountants
Smaller Business Association of New England
Central Rhode Island Chamber of Commerce

South Carolina

Associated Builders and Contractors of the Carolinas
Carolinas Associated General Contractors
Homebuilders Association of South Carolina
Palmetto Agri-Business Council
South Carolina Alliance to Fix Our Roads
South Carolina Association of Counties
South Carolina Chamber of Commerce
South Carolina Forestry Association
South Carolina Manufacturer's Alliance
South Carolina Petroleum Council
South Carolina Petroleum Marketers Association
South Carolina Retail Association

Mr. Denis McDonough

August 13, 2015

Page 12

South Dakota

South Dakota Chamber of Commerce & Industry

South Dakota Electric Utility Companies

South Dakota Farm Bureau

Tennessee

Associated General Contractors of Tennessee

Greater Tennessee Chapter - Associated Builders and Contractors Inc.

Tennessee Chamber of Commerce & Industry

Tennessee Construction Coalition

Tennessee Fuel and Convenience Store Association

Tennessee Oil and Gas Association

Tennessee Petroleum Council

Tennessee Road Builders Association

Vermont

Associated Industries of Vermont

Virginia

Virginia Agribusiness Council

Virginia Chamber of Commerce

Virginia Farm Bureau Federation

Virginia Forest Products Association

Virginia Manufacturers Association

Virginia Oil and Gas Association

Virginia Petroleum Convenience and Grocery Association

Virginia Petroleum Council

Virginia Trucking Association

West Virginia

West Virginia Oil Marketers and Grocers Association

West Virginia Petroleum Council

West Virginia Trucking Association

Wisconsin

Aggregate Producers of Wisconsin

Associated Builders & Contractors of Wisconsin

Associated General Contractors of Wisconsin

Cooperative Network of Wisconsin

Midwest Equipment Dealers Association

Midwest Food Processors Association

Mr. Denis McDonough

August 13, 2015

Page 13

Milwaukee Metro Association of Commerce
Petroleum Marketers & Convenience Stores Association
Transportation Builders Association
Transportation Development Association of Wisconsin
Wisconsin Automotive Care Association
Wisconsin Automotive Parts Association
Wisconsin Auto & Truck Dealers Association
Wisconsin Engine Manufacturers & Distributors Association
Wisconsin Grocers Association
Wisconsin Housing Alliance
Wisconsin Industrial Energy Group
Wisconsin Manufacturers & Commerce
Wisconsin Motor Carriers Association
Wisconsin Paper Council
Wisconsin Petroleum Council