



August 3, 2011

The President  
The White House  
Washington, DC 20500

Dear Mr. President:

As associations that represent thousands of American businesses, both large and small, who employ millions of U.S. workers, we are deeply concerned about the harmful impact the Environmental Protection Agency's (EPA's) proposed final rule on ground-level ozone could have on U.S. job creation and economic recovery. We strongly urge you to refrain from finalizing this rule and instead wait for the scientific review process currently underway in support of the required 2013 review to take its course.

All of us value clean air. The companies we represent, their employees and their managers all care about the quality of the air that Americans breathe. All of us breathe the same air and so do our families. We appreciate the fact that ground-level ozone levels continue to drop across most of the United States under the current *de facto* standard established in 1997. Moreover, U.S. companies are proactively making significant investments to meet the stricter *de jure* standard established in 2008, even though it has not yet been implemented.

The newest standard proposed by EPA, however, likely would cast hundreds of counties across the United States out of compliance, making it difficult for businesses to build new facilities in those counties or expand existing ones. Further, EPA has estimated the proposed standard will cost between \$20 and \$90 billion annually. In our view, EPA's estimate is based on optimistic assumptions about the development of new control technology, meaning that the costs and impact on jobs and economic growth could be much worse.

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What we do know for certain is that EPA's proposed rule, whether the final standard is 0.060 parts per million (ppm) or 0.070 ppm, would limit business expansion in nearly every populated region of the United States and impair the ability of U.S. companies to create new jobs.

Mr. President, we urge you to delay this discretionary, out-of-cycle ozone standard and wait until 2013 before determining whether a new standard is needed. Now is not the time to saddle our economy with the extraordinary costs associated with EPA's proposed national ozone standard.

Thank you for your attention to the grave consequences of this proposed rule.

Sincerely,

Business Roundtable  
American Chemistry Council  
American Petroleum Institute  
National Association of Manufacturers  
National Federation of Independent Business  
U.S. Chamber of Commerce