

June 19, 2015

President Barack Obama  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. President:

This week you are scheduled to address the nation's mayors—the lawmakers responsible for the economic prosperity and development in cities across the country. As you do, the undersigned organizations, representing a broad spectrum of the economy, write to express our deep concern with the Environmental Protection Agency's (EPA) proposed rule to lower the National Ambient Air Quality Standard (NAAQS) for ground-level ozone. In September 2011, you instructed the Administrator of the EPA to withdraw the then pending ground-level ozone rule, citing the importance of reducing regulatory burdens and uncertainties as the economy struggled to recover from recession.<sup>1</sup> The concerns you identified in 2011 still very much persist for our organizations today and we fear that the costs, delays and barriers to growth associated with a new ozone rule will have a severely negative impact on the U.S. economy, our international competitiveness and jobs.

The EPA's proposed ozone rule could be the most expensive regulation in U.S. history. It is being contemplated at a time when air quality, which is better than it has been in decades, will continue to improve due to yet-to-be implemented investments whose benefits have yet to be fully realized. In fact, ozone levels have fallen 33 percent since 1980,<sup>2</sup> and the current standard of 75 parts per billion (ppb), set in 2008, is just now being implemented. In addition, regulations and investments to improve fuel economy, increase energy efficiency and reduce emissions from stationary and mobile sources will drive further air quality improvements over the next decade, and beyond.

The objectives of this regulation are important: ensuring clean and safe air for the public and environment. We are committed to these objectives. However, the simple fact is that we have reached a point with this particular policy that regulatory flexibilities are diminishing and technological feasibility is lacking. We are committed to striving for additional improvements in environmental protection, but we need policies that allow us to grow, innovate and unlock the next generation of technological breakthroughs.

In the name of promoting a clean environment and a strong economy, we urge you to follow the lead set by the U.S. Conference of Mayors, National Association of Counties, National League of Cities and National Association of Regional Councils in their March 17, 2015 letter<sup>3</sup> and instruct the EPA to retain the existing 2008 ground-level ozone standard, which has still not been fully implemented.

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<sup>1</sup> President Barack Obama, *Statement by the President on the Ozone National Ambient Air Quality Standards*, September 2, 2011. <https://www.whitehouse.gov/the-press-office/2011/09/02/statement-president-ozone-national-ambient-air-quality-standards>.

<sup>2</sup> Environmental Protection Agency, *Air Quality Trends*. <http://www.epa.gov/airtrends/agtrends.html#comparison>.

<sup>3</sup> The U.S. Conference of Mayors, National Association of Counties, National League of Cities and National Association of Regional Councils, *Letter to EPA Re: Docket No. EPA-HQ-OAR-2008-0699, National Ambient Air Quality Standards for Ozone*, March 17, 2015.

Sincerely,

Aerospace Industries Association  
Alliance of Automobile Manufacturers  
Aluminum Association  
American Bakers Association  
American Chemistry Council  
American Coalition for Clean Coal  
Electricity  
American Coatings Association  
American Composites Manufacturers  
Association  
American Concrete Pressure Pipe  
Association  
American Farm Bureau Federation  
American Forest & Paper Association  
American Foundry Society  
American Fuel & Petrochemical  
Manufacturers  
American Iron and Steel Institute  
American Petroleum Institute  
American Wood Council  
America's Natural Gas Alliance  
Arizona Chamber of Commerce & Industry  
Arkansas Environmental Federation  
Arkansas State Chamber of  
Commerce  
Associated Industries of  
Arkansas  
Associated Industries of Florida  
Associated Industries of Missouri  
Associated Oregon Industries, Inc.  
Association of Washington Business  
Auto Care Association  
Brick Industry Association  
Business Council of Alabama  
Business Roundtable  
California Cotton Ginners Association  
California Cotton Growers Association  
California Manufacturers & Technology  
Association  
The Carpet and Rug Institute  
Colorado Association of Commerce &  
Industry (CACI)  
Consumer Specialty Products Association  
Copper Development Association  
Corn Refiners Association  
Council of Industrial Boiler Owners  
Energy Equipment and Infrastructure

Alliance  
The Fertilizer Institute  
Fibre Box Association  
Flexible Packaging Association  
Forging Industry Association  
Foundry Association of Michigan  
Georgia Association of Manufacturers  
Glass Packaging Institute (GPI)  
Global Cold Chain Alliance  
Hardwood Federation  
Illinois Manufacturers' Association  
Independent Lubricant Manufacturers  
Association  
Independent Petroleum Association of  
America  
Indiana Cast Metals Association  
Indiana Manufacturers Association, Inc.  
Industrial Fasteners Institute  
Industrial Minerals Association – North  
America  
International Liquid Terminals Association  
Interstate Natural Gas Association of  
America (INGAA)  
Iowa Association of Business & Industry  
Kansas Chamber of Commerce & Industry  
Kitchen Cabinet Manufacturers Association  
Louisiana Association of Business &  
Industry  
Metal Powder Industries Federation  
Metalcasters of Minnesota  
Metals Service Center Institute  
Michigan Manufacturers Association  
Mississippi Manufacturers Association  
NAHAD - The Association for Hose &  
Accessories Distribution  
National Asphalt Pavement Association  
National Association of Home Builders  
National Association of Manufacturers  
(NAM)  
National Lime Association  
National Mining Association  
National Oilseed Processors Association  
Natural Gas Association of America  
Nevada Manufacturers Association  
North American Die Casting Association  
North Carolina Chamber  
Ohio Cast Metals Association

The Ohio Manufacturers' Association  
Pennsylvania Foundry Association  
Petroleum Equipment & Services  
Association  
Portland Cement Association  
Power Transmission Distributors  
Association  
Printing Industries of America  
Rhode Island Manufacturers Association  
Roof Coatings Manufacturers Association  
(RCMA)  
Southeastern Lumber Manufacturers  
Association  
State Chamber of Oklahoma  
Steel Tank Institute/Steel Plate Fabricators  
Association  
Tennessee Chamber of Commerce and  
Industry  
Texas Association of Business  
Texas Cast Metals Association (TCMA)  
Texas Cotton Ginners' Association  
Treated Wood Council  
U.S. Chamber of Commerce  
Utility Air Regulatory Group  
The Vinyl Institute  
Western Agricultural Processors  
Association  
Wisconsin Cast Metals Association  
Wisconsin Manufacturers & Commerce