

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.¹ 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 1980,² 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 letter³ and instruct the EPA to retain the existing 2008 ground-level ozone standard, which has still not been fully implemented.

¹ 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>.

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

³ 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
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
U.S. Chamber of Commerce Institute for
21st Century Energy
Utility Air Regulatory Group
The Vinyl Institute
Western Agricultural Processors
Association
Wisconsin Cast Metals Association
Wisconsin Manufacturers & Commerce