

CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

NEIL L. BRADLEY
SENIOR VICE PRESIDENT &
CHIEF POLICY OFFICER

1615 H STREET, NW
WASHINGTON, DC 20062
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June 27, 2017

The Honorable Greg Walden
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Walden and Ranking Member Pallone:

The U.S. Chamber of Commerce strongly supports H.R. 806, the “Ozone Standards Implementation Act of 2017.” This important piece of legislation would provide for the reasonable implementation of the 2015 National Ambient Air Quality Standards (NAAQS) for ozone, streamline the air permitting process, and institute other reforms to federal air quality standards, allowing for a balance between environmental stewardship and economic and employment growth.

States, along with business and industry, have been working hard to improve the nation’s air quality for many years. Indeed, ozone levels have decreased 33% since 1980, and those levels will continue to decline as states implement the 2008 ozone standards. EPA itself projects that most of the country will meet the 2015 ozone standard of 70 parts per billion (ppb) by 2025 simply by implementing existing air standards, such as the 2008 ozone standards. Consequently, H.R. 806 would allow for the sensible and efficient alignment of the implementation deadlines for the 2015 and 2008 ozone standards so that states have time to implement the 2008 ozone standard first, while still improving air quality. Otherwise, states may have to expend time and resources unnecessarily trying to implement two ozone standards simultaneously, and state and local areas may be faced with adverse impacts in terms of stymied economic development and lost job creation.

In addition to harmonizing the deadlines for the 2015 ozone standards, the Ozone Standards Implementation Act of 2017 would, among other things, do the following: (1) require that the 2015 ozone standard would not apply to new air permits completed before final nonattainment designations; (2) change the review for NAAQS from 5 to 10 years; (3) provide that when establishing or revising a NAAQS, the EPA Administrator may consider technological feasibility as a secondary consideration; (4) require the EPA Administrator to publish concurrently implementing guidance and regulations when establishing or revising a NAAQS in order to assist states, permitting authorities, and permitting applicants; and (5) require the EPA Administrator to request advice on the adverse public health, welfare, social, economic, or

energy effects from the Clean Air Science Advisory Committee before establishing or revising a NAAQS.

The Chamber strongly supports H.R. 806, the “Ozone Standards Implementation Act of 2017,” and encourages you to support the legislation during the Energy and Commerce Committee’s mark-up of the bill.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil L. Bradley", with a stylized flourish at the end.

Neil L. Bradley

cc: Members of the Committee on Energy and Commerce