

March 17, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As representatives of Louisiana's business community, we, the undersigned chambers and economic development organizations of the state of Louisiana, feel compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push nearly every pocket of the state of Louisiana into "nonattainment," and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area's residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, the undersigned organizations strongly oppose the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we've cut ozone-forming emissions in half as a nation since 1980 is a testament to this statement. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA's proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

Policies that effect local economies so adversely should be enacted sparingly, and only when absolutely necessary; unfortunately, neither is the case with the EPA's proposed standards. While the EPA enacted stricter ozone standards six years ago, the Agency effectively suspended implementation of those standards from 2010-2012 while it unsuccessfully pursued reconsideration. Because of this delay, states are still making up ground in putting the current standards into effect, meaning we have yet to see the full impact of the last standard decrease, which was implemented just six years ago.

Further, there is mounting uncertainty concerning the consequences of the proposed standards. 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, which contributes to poor health and premature death. As a representative of businesses that provide much-needed jobs in our community, we believe that we have a duty to explore uncertainties such as these, and to enact policies that strengthen the environment without harming individuals in our community.

It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,



LABI | Louisiana Association
OF BUSINESS AND INDUSTRY

MINDEN
SOUTH WEBSTER
CHAMBER OF COMMERCE

Merroe
chamber of commerce

north louisiana
economic partnership

The Central Louisiana
CHAMBER
OF COMMERCE
ANNUAL EVENTS



WEST BATON ROUGE
CHAMBER OF COMMERCE



March 6, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency

Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

The Louisiana Association of Business and Industry (LABI) appreciates this opportunity provided by the Environmental Protection Agency to share our members' concerns over the agency's proposed ozone standard. Louisiana's businesspeople are keenly sensitive to the broad economic impacts arising from federal regulations, even when those rules are directed at a specific industry. In this case, a large array of industries will bear the burden of this new rule, and it will affect virtually every individual and business in Louisiana at some level.

The impending new ozone standard that the EPA seeks to impose are of particular concern to Louisiana's businesspeople because of our state's tenuous economic recovery and the harm the new standards represent to anticipated project development in our state. Louisiana is poised to experience significant industrial growth and expansion in the years ahead. However, the uncertainty and burden eliciting from the EPA's new standards threaten to snuff out the flame of this forecast manufacturing renaissance.

LABI is Louisiana's chamber of commerce and manufacturers' association. Our organization exists to promote economic development and advocate for an improved business climate in Louisiana by representing the general interests of its business community through active involvement in the political, legislative, judicial and regulatory processes. LABI represents trade associations, chambers of commerce, and thousands of individual businesses from across our state.

Our membership includes over 5,000 business owners and operators in all sectors, including accounting, banking and financial services, chemical manufacturing, communications, construction, energy, engineering services, food and beverage production, health care, hospitality, legal services, oil and gas, retail and wholesale, tourism, and transportation. More than 85% of LABI's members represented in these business sectors are small businesses employing 100 employees or less. Our member businesses employ tens of thousands of workers in every region of our state. These employers and employees have a profound interest and stake in the EPA's new ozone standard.

Around \$100 billion in new projects have been announced for Louisiana, and with them, hundreds of thousands of jobs. This represents tremendous potential for all of Louisiana's citizens to experience substantial income growth. This will likewise enhance state and local revenues. Yet, a standard below the existing 75 parts per billion level would likely cause many, if not all, of those projects to be shelved, as their profitability will necessarily be placed in some jeopardy. In fact, I am told, in some cases, the threat of the lower standard already has caused some to be placed on hold pending the final outcome.

Four factors that business abhors most are uncertainty, red tape, unnecessary expenditures and unanticipated delays. Business owners and operators require continuity and predictability in order to plan and make decisions. They must have few and minimal cost impacts to a project to make it affordable and worthwhile.

When any of these four factors are in play, businesspeople are inclined to wait and see. This effectively paralyzes business activity. Capital is withheld pending a more definitive and reliable outcome. New employment is postponed likewise. It is the nature of businesspeople to be certain before acting. Economic laws operate in spite of government interventions, and those laws cannot be defied without consequences.

As you know, the National Association of Manufacturers (NAM) recently commissioned a study by NERA Economic Consulting to assess, on both a national and state-by-state basis, the economic impacts arising from the ozone standard being lowered to 65 ppb. One of the more alarming aspects of a 65 ppb standard is the fact that it would place three quarters of Louisiana's parishes – including some rural parishes without any industrial plants – under non-attainment. Some parishes in our state achieved attainment at the current 75 ppb level just this past year.

The costs of the proposed standard to Louisiana are staggering to consider, and our state would be one of the hardest hit by the proposed decrease. Louisiana's economy would lose \$3 billion in Gross State Product between 2017 and 2040. It would lose nearly 34,000 jobs or job equivalents annually. Compliance costs would approach \$45 billion. This sort of damage to Louisiana's economic growth will be devastating. Louisiana has set an all-time record for total private employment. Yet, our state's ability to maintain that employment level beyond this year will hit a serious wall if the EPA's standard is lowered to 65 ppb.

Our country has made great progress during recent years in reducing concentrations of ground-level ozone. Levels have dropped almost 25 percent since 1980 despite the growth of the U.S. economy and the industries that support it. This is due to a commitment on the part of American manufacturers to deploy and utilize best practices and state-of-the-art emissions reduction technologies. American manufacturers excel at finding solutions, but the new mandate from the

EPA may create a problem that even they cannot solve. We would hope that the agency takes seriously with the prospect that millions of American jobs are at stake.

As onerous as the new standard may seem, the penalty for noncompliance is debilitating – especially for a state like Louisiana. Being deemed in nonattainment would mean our state would be unable to attract new investment or even expand existing businesses until industries in the region find emissions reductions sufficient to bring it back into attainment. Given the EPA’s inability to provide insight into what some of those reduction practices would entail, prospects appear pretty bleak.

The EPA’s proposed ozone standard would be unsustainable and unachievable in Louisiana. Louisiana manufacturers and businesses are dedicated to improving their operations in order to protect our environment and enhance our quality of life – all while ensuring economic prosperity for our communities. The timing of this job-killing regulation is gravely concerning at this moment in Louisiana’s history. Our state is on the verge of a great run, one that could redefine our economy for generations, but the EPA’s proposed ozone standard would unquestionably derail it. LABI strongly urges the EPA to rescind its proposed new ozone standard and retain the current 75 ppb level.

Thank you again for this opportunity to comment on this matter of great importance to all of Louisiana’s businesses and their employees.

Sincerely,

Jim Patterson
Vice President, Government Relations
Director, Taxation and Finance Council
Director, Environmental Quality Council



One Voice. Amplified.

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Baton Rouge, LA 70808
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Fax: 225-929-6054
Email jimp@labi.org
Visit Our Website at LABI.org

March 9, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

P.O. Box 667
Jackson, LA 70748
www.efpedd.com

T/F: (225) 634-7155

audrey@efpedd.com

Dear Administrator McCarthy:

As a representative of the local business community, East Feliciana Parish Economic Development District (EFPEDD) feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Baton Rouge area into “nonattainment,” and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area’s residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, EFPEDD strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we’ve cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA’s proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit

requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

Policies that effect local economies so adversely should be enacted sparingly, and only when absolutely necessary; unfortunately, neither is the case with the EPA's proposed standards. While the EPA enacted stricter ozone standards six years ago, the Agency effectively suspended implementation of those standards from 2010-2012 while it unsuccessfully pursued reconsideration. Because of this delay, states are still making up ground in putting the current standards into effect, meaning we have yet to see the full impact of the last standard decrease, which was implemented just six years ago.

Further, there is mounting uncertainty concerning the consequences of the proposed standards. 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, which contributes to poor health and premature death. As a representative of businesses that provide much-needed jobs in our community, we believe that we have a duty to explore uncertainties such as these, and to enact policies that strengthen the environment without harming individuals in our community.

It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,



Bobbie Bourgeois
Chairman



EAST FELICIANA CHAMBER OF COMMERCE

March 10, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, East Feliciana Chamber of Commerce feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the [insert area name] area into "nonattainment," and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area's residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, East Feliciana Chamber of Commerce strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we've cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA's proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

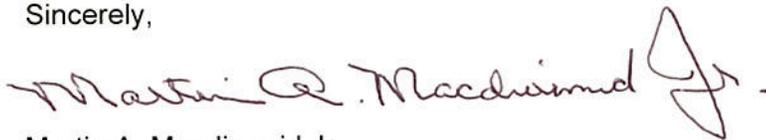
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Further, there is mounting uncertainty concerning the consequences of the proposed standards. Studies show that by increasing the costs of goods and services such as energy, and decreasing disposable incomes, regulation can inadvertently harm the socio-economic status of individuals, which contributes to poor health and premature death. As a representative of businesses that provide much-needed jobs in our community, we believe that we have a duty to explore uncertainties such as these, and to enact policies that strengthen the environment without harming individuals in our community.

It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,

A handwritten signature in dark ink, reading "Martin A. Macdiarmid Jr." with a stylized flourish at the end.

Martin A. Macdiarmid Jr.
President



10 PARISHES
Jefferson
Orleans
Plaquemines
St. Bernard
St. Charles
St. James
St. John the Baptist
St. Tammany
Tangipahoa
Washington

March 6, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, Greater New Orleans, Inc. feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Greater New Orleans area into “nonattainment,” and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area’s residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, Greater New Orleans, Inc. strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we’ve cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA’s proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

Policies that effect local economies so adversely should be enacted sparingly, and only when absolutely necessary; unfortunately, neither is the case with the EPA’s proposed standards. While the EPA enacted stricter ozone standards six years ago, the Agency effectively suspended implementation of those standards from 2010-2012 while it unsuccessfully pursued reconsideration. Because of this delay, states



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are still making up ground in putting the current standards into effect, meaning we have yet to see the full impact of the last standard decrease, which was implemented just six years ago.

Further, there is mounting uncertainty concerning the consequences of the proposed standards. 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, which contributes to poor health and premature death. As a representative of businesses that provide much-needed jobs in our community, we believe that we have a duty to explore uncertainties such as these, and to enact policies that strengthen the environment without harming individuals in our community.

It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,

Michael Hecht
President and CEO



March 10, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, [insert organization's name] feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the [insert area name] area into "nonattainment," and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area's residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, the Iberville Chamber of Commerce strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we've cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA's proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

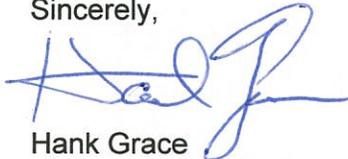
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It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,



Hank Grace
Executive Director



February 6, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, The Jefferson Chamber of Commerce feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Jefferson Parish area into “nonattainment,” and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area’s residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, The Jefferson Chamber of Commerce strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we’ve cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA’s proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

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Sincerely,



Todd P. Murphy
President



March 10, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, the Livingston Economic Development Council (LEDC) feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Livingston Parish area into “nonattainment,” and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area’s residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, the LEDC strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we’ve cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA’s proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements

Physical address: 20355 Government Blvd., Suite E Livingston, LA 70754

Mailing address: P.O. Box 809 Livingston, LA 70754

Phone: 225-686-3982 **Fax:** 225-686-3983 **Email:** Info@ledc.net

deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

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Sincerely,

A handwritten signature in black ink, appearing to read "Randy Rogers", with a long horizontal line extending to the right.

Randy Rogers
President and CEO

Physical address: 20355 Government Blvd., Suite E Livingston, LA 70754

Mailing address: P.O. Box 809 Livingston, LA 70754

Phone: 225-686-3982 **Fax:** 225-686-3983 **Email:** Info@ledc.net



Together we're stronger.
www.monroe.org

March 4, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, The Monroe Chamber of Commerce feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Ouachita Parish area into "nonattainment," and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area's residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, the Monroe Chamber of Commerce strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we've cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA's proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies to enter a new market, or even grow in the markets they currently

occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

Policies that effect local economies so adversely should be enacted sparingly, and only when absolutely necessary; unfortunately, neither is the case with the EPA's proposed standards. While the EPA enacted stricter ozone standards six years ago, the Agency effectively suspended implementation of those standards from 2010-2012 while it unsuccessfully pursued reconsideration. Because of this delay, states are still making up ground in putting the current standards into effect, meaning we have yet to see the full impact of the last standard decrease, which was implemented just six years ago.

Further, there is mounting uncertainty concerning the consequences of the proposed standards. 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, which contributes to poor health and premature death. As a representative of businesses that provide much-needed jobs in our community, we believe that we have a duty to explore uncertainties such as these, and to enact policies that strengthen the environment without harming individuals in our community.

It is our strong recommendation that the standard remain 75 ppb.

The air is getting cleaner, and the current ozone standards should be given the opportunity to work. In light of this fact, as well as the economic hardship our community would undergo for a policy with uncertain benefits, we strongly urge the EPA not to proceed with implementing any changes that include lowering of the ozone NAAQS at this time.

Sincerely,



Sue Nicholson
President and CEO



March 6, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As the regional business organization for five parishes, The Chamber Southwest Louisiana (Chamber SWLA) feels compelled to express our deep concern about the impact of proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Headquartered in Lake Charles, The Chamber SWLA has more than 1,500 members representing a wide range of small and large businesses and professions spread over Allen, Beauregard, Calcasieu, Cameron and Jefferson Davis Parishes. Our mission is to develop Southwest Louisiana by creating economic opportunity, and demanding responsible government and quality education. Southwest Louisiana boasts a robust industrial sector, and we strive to find a beneficial balance between our concern for environmental quality and common sense regulation that allows our major employers to succeed.

Ozone standards at the level proposed by the EPA would push the Lake Charles area into “nonattainment,” and create a heavy burden on commercial and industrial activity. Southwest Louisiana is home to several major plants and refineries, and has been selected for more than \$85 billion in new projects or expansions. These projects are considerable economic development achievements and will help to lift our region out of poverty, continue our hurricane recovery progress and provide a better quality of life for our communities. To ensure the success of these projects for the benefit of generations of workers and families in our region, as well as to protect our natural resources that nurture our economy and define our heritage, The Chamber SWLA advocates for economically responsible environmental regulation. We believe the proposed rule change would adversely affect our economy and jeopardize these projects.

Because of this, The Chamber SWLA strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

Sincerely,

George Swift, President and CEO
SWLA Economic Development Alliance



March 9, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Attn: Docket ID No. EPA-HQ- OAR-2008-0699

Dear Administrator McCarthy:

As a representative of the local business community, the West Baton Rouge Chamber of Commerce feels compelled to express our deep concern about the proposed National Ambient Air Quality Standards (NAAQS) for ozone rule issued by the Environmental Protection Agency (EPA) on November 25, 2014.

Ozone standards at the level proposed by the EPA would push the Capital Region area into “nonattainment,” and create a heavy burden on commercial and industrial activity. This burden would not only be borne by local businesses, but also by our area’s residents. Aside from an inability to create new jobs, stunted business growth would mean less tax revenue for the area – tax revenue that funds vital public safety and education programs. The proposed rule creates a tremendous hardship for local businesses and citizens, while the alleged benefits are unverified and uncertain.

Because of this, the West Baton Rouge Chamber of Commerce strongly opposes the proposed reductions in ambient air quality standards from the current level of seventy-five parts per billion (ppb).

We all value clean air; the fact that we’ve cut ozone-forming emissions in half as a nation since 1980 is a testament to this fact. Despite this progress, and in the wake of the EPA updating ozone standards just six years ago, the EPA is now proposing an even more stringent range of standards from 70 to 65 ppb. If adopted, this standard would push large swaths of the country into nonattainment. In fact, the standards are so heavy-handed that even the pristine Grand Canyon and Yellowstone National Parks fail to meet them.

If finalized, the EPA’s proposed standards would restrict business expansion in nearly every region of the country, including ours. The standards add another layer of red tape to companies seeking to grow. Increased costs associated with restrictive and expensive permit requirements deter companies from building facilities in nonattainment areas; companies already in nonattainment areas will be required to meet the strictest Clean Air Act standard should they seek to grow or renovate their existing facilities. The increased compliance costs create a disincentive for companies

to enter a new market, or even grow in the markets they currently occupy. The stagnancy will result in less job creation and lower revenue collected through local taxes, and stifle the economic recovery taking place in communities across the country.

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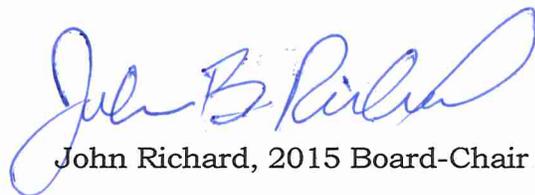
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Sincerely,



Scott Gaudin, 2015 Board Chair
West Baton Rouge Chamber of Commerce



John Richard, 2015 Board-Chair Elect

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