



March 10, 2015

The Honorable Gina McCarthy
Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mailcode 28221T
Attn: Docket ID No. EPA-HQ- OAR-2008-0699
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator McCarthy:

These comments are submitted on behalf of the Metro Atlanta Chamber (MAC), which represents over 2,500 businesses and 1,000,000 employees in the 29-county Metropolitan Statistical Area for Atlanta, Georgia. As addressed below, **MAC believes EPA should not change the current ozone standards** as it would detrimentally impact our thriving economic region with extraordinary compliance costs paired with uncertain health benefits.

Analysis shows that the proposed new ozone regulations could cost Georgia, and largely metro Atlanta, a loss of more than \$50 billion in lost productivity through 2040. Metro Atlanta has long worked with the Georgia Environmental Protection Division (GEPD) to improve our air quality and significant gains have been made. In fact, ozone levels in metro Atlanta have continued to decline over the last fifteen years, but currently remain above the current 2008 standard. To establish new ozone standards now, without achieving or completing attainment of the 2008 standard, would create business uncertainty that threatens our recent economic stability.

At 70 ppb as proposed, the metro Atlanta area will most likely continue to exceed the standard. Factor in the role that weather patterns play in fluctuating ozone values, plus the lack of implementable solutions for ozone reduction to 70 ppb and the result would cripple our region and state with the cost of compliance. For example, new or expanding facilities would be subject to additional permitting requirements and existing facilities would be subject to additional emission controls that technologically may not exist today. Further, enhanced coordination would be required between local and state transportation planners and GEPD to ensure transportation and air quality plans align.

At 65 ppb, several other areas of the state might exceed the standard in addition to metro Atlanta. Most of Georgia could face the possibility of non-attainment status – resulting in decreased manufacturing output, frozen federal highway funds and slow or no economic growth.

For these reasons above and listed below, **MAC urges EPA to work with communities, regions and states to achieve existing standards before contemplating a new ozone standard.**

- Business certainty is important to economic growth and vitality. Sensible federal regulations are the responsibility of the U.S. government and the proposed ozone standards should adhere to these principles.
- State and local governments should be given a chance to meet the current standards before changing them again.



- Naturally occurring ozone must be acknowledged when setting new standards. There are many areas of the country where background levels of ozone are above the proposed standards EPA is considering.
- Air quality in metro Atlanta continues to improve and ozone emissions will continue to decline without new regulations.
- Health data show that the current standards are protective.
- Tightening ozone standards could increase costs to metro Atlanta businesses and reduce the ability to compete nationally and globally. Decreased productivity will impact job growth and much-needed income mobility.

The chamber serves as a catalyst for a more prosperous and vibrant region. MAC is committed to being an active voice for the business community, serving as an advocate for a competitive business climate and telling Atlanta's story.

If you have any questions, please contact me at 404.586.8544 or kkirkpatrick@macoc.com.

Sincerely,

A handwritten signature in black ink that reads "Katie Kirkpatrick".

Katie Kirkpatrick, P.E.
Chief Policy Officer
Metro Atlanta Chamber

cc: Mr. Jud Turner, GEPA