

March 1, 2015

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

Dear Administrator McCarthy:

As trade associations representing a wide range of businesses that employ thousands in Connecticut, we are very concerned about the harmful impact EPA's proposed ozone rule will have on employers here. According to EPA's own data, the proposed 65-70 ppb standard is unobtainable in much of Connecticut, even by 2025. Therefore, we strongly urge you to retain the current ozone standard (75 ppb)---and not go any lower---because a lower standard is just not practical. As you know, we have cut our ozone emissions here enormously since the 1980's.

If finalized at a level lower than 75 ppb, EPA's standard could limit business expansion, impair the ability of local companies to create new jobs, and create more regulatory red tape. Regulators at the Connecticut Department of Energy & Environmental Protection would be forced to issue new regulations and control strategies which we expect would severely impact companies that currently operate or wish to expand their facilities here, as well cars, trucks and buses. Increased costs make us a less attractive place to do business. The Clean Air Act also carries stiff consequences for non-attainment areas such as Connecticut.

The non-attainment designation also has a profound impact on infrastructure development: Beginning one year from the date of non-attainment designation, federally-supported highway and transit projects cannot proceed in a non-attainment area such as Connecticut unless the state can demonstrate that the project will not cause any increase in ozone emissions.

EPA just updated its ozone standard six years ago, so a re-write isn't necessary. That standard is behind schedule due to EPA suspending its implementation, but once promulgated, we will see even greater ozone reductions as states make up lost ground when the current 75 ppb standard actually becomes effective. We all value clean air, and implementing the 75 ppb standard in full will give us an air quality standard we can be proud of.

The air is getting cleaner and the current 75 ppb ozone standard needs an opportunity to work. In light of economic hardship and uncertain benefits related to the stringent standard EPA is considering, we ask you to retain the existing 75 ppb ozone standard in the final rule.

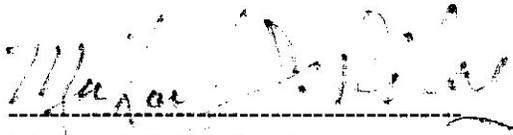


Eric Brown, Associate Counsel  
Connecticut Business & Industry Association

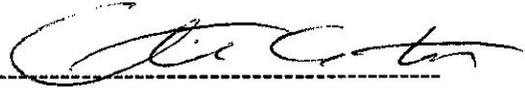
Sincerely,



William Ethier, Chief Executive Officer  
Home Builders & Remodelers  
Association of Connecticut



Michael J. Riley, President  
Motor Transport Association of Connecticut



Christian A. Herb, President  
Connecticut Energy Marketers  
Association



Michael J. Fox, Executive Director  
Gasoline & Automotive Service Dealers  
Of America, Inc.



Jean M. Cronin, Executive Director  
Connecticut Bus Association