



24 Cleveland Street | Greenville, SC 29601

March 9, 2015

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.,
Washington, D.C. 20004

To Whom It May Concern:

The Chambers of the Upstate Chamber Coalition write to you strongly opposing setting the Ground Ozone Regulations at 60 ppb. While we value the quality of the air we breathe here in the Upstate, this draconian cut would cripple our Upstate economies.

S.C. DHEC has indicated that at 60 ppb nearly the whole state of South Carolina, 41 out of 46 counties, would be in danger of nonattainment, including all of our counties in the Upstate Coalition area. According to the National Association of Manufacturers, it would cost our state approximately \$26 billion to comply with this regulation, a dollar amount that would be impossible for our state to pay.

Here in the Upstate, our economy depends heavily on commercial services and manufacturing, with companies like BMW, Michelin, ZF, Bosch, Milliken, and Toray Industries leading our transformation from a 20th Century textile capital to a 21st Century manufacturing innovator. A nonattainment status would shut down any expansion for these companies, severely impact economic growth, and would ultimately result in thousands of lost jobs, and more than \$40 billion in gross state product loss for South Carolina over the next twenty years.

The Greenville-Spartanburg-Anderson metro area has experienced a revolutionary economic revitalization over the past several years, and was even recognized by the Brookings Institute as a top twenty metropolitan area economy. We have worked worked hard to comply with the 75 ppb regulation, launching numerous campaigns and initiatives and forming partnerships between air quality groups and local businesses to help reduce emissions. As a result, the air quality in this area has improved, and we've seen a steady reduction in our ozone design values. To set ozone regulations at 60 ppb would punish these improving areas, handcuff our economy, and greatly impact our residents' improving economic standing.

We can support stepping down the 75 ppb regulation – and are willing to work with the EPA on such a move – but not at the cost of paralyzing our dynamic economy. The Upstate Chamber Coalition's 13 Chambers of Commerce and 8,000-member-strong business community strongly oppose changing the ozone regulations to 60 ppb. We hope that you will take into account the feasibility of complying with these new regulations, and the devastating effects a nonattainment status can have on local economies.

Sincerely,

Jason Zacher &
Katie Busbee

Greenville Chamber of Commerce · Spartanburg Area Chamber of Commerce · Greater Greer Chamber of Commerce
Anderson Area Chamber of Commerce · Cherokee County Chamber of Commerce · Clemson Area Chamber of Commerce
Easley Chamber of Commerce · Greenwood Chamber of Commerce · Laurens County Chamber of Commerce
Oconee County Chamber of Commerce · Simpsonville Area Chamber of Commerce
Westminster Chamber of Commerce · Walhalla Chamber of Commerce