



March 17, 2015

The Honorable Gina McCarthy  
Administrator  
U.S Environmental Protection Agency

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

Dear Administrator McCarthy:

The Denver Metro Chamber of Commerce and its affiliates, the Metro Denver Economic Development Corporation and the Colorado Competitive Council, represent over 3,000 diverse Colorado businesses and over 300,000 workers in Colorado. On behalf of Colorado's business community, we are submitting the following comments in response to the EPA's proposal to lower the ozone National Ambient Air Quality Standards (NAAQS) from 75 parts per billion to a range of 65-70 ppb. We believe that the economic growth of Colorado is threatened by the EPA's proposal to lower the ozone standard. Consequently, we request that the EPA retain the current 75 ppb ozone standard.

Colorado recently adopted policies that will significantly reduce air emissions and improve air quality. For example, utilities are making large investments in new electric generation units following passage of the Colorado Clean Air-Clean Jobs Act of 2010, which serves as a national model for reducing air pollution and increasing the use of cleaner energy sources. Additionally, last year, Colorado adopted some of the most aggressive regulations in the nation with regard to emissions of volatile organic compounds (VOC) and methane from the oil and gas sector.

We continue to push for cost-effective steps that improve our environment, and Colorado is working hard to comply with the most recently revised federal ground-level ozone standard of 75 parts per billion (ppb) that was promulgated in 2008. According to the Regional Air Quality Council (RAQC), we are making significant strides to continue reducing ozone-precursor emissions.

However, it is important to note that Colorado labors under particularly unique challenges when it comes to ozone mitigation. According to the West-wide Jumpstart Air Quality Modeling Study, funded by the Bureau of Land Management and State of New Mexico, Colorado is a net-receiver of ozone pollution. In fact, 60-65 percent of ozone pollution influencing the Front Range of Colorado originates from Western Boundary Conditions, which is ozone entering the continental United States. Another 10-15 percent comes from other western states, and 5-10 percent from natural background. Only 20 percent of ozone along Colorado's Front Range originates from emission generated within the state.

While we recognize the importance of meeting the current 75 ppb requirement and are on track to reaching this standard in the next few years, the newly proposed 65-70 ppb standards are unreasonable given our geographic considerations, including the effects of high altitude, and other contributing factors beyond our state borders.

We request the EPA emphasize flexibility in its 2015 proposed standards and provide states adequate avenues to deal with unique challenges. Colorado has contributed to more than 30 years of efforts to decrease national ozone levels, but our state is approaching a point where additional requirements may be impossible to meet. It may no longer be appropriate to hold all states to the same national requirements, as geology, air flow, and weather patterns are significantly different throughout the country.

Economic development and environmental conservancy are not mutually exclusive. We are proud of our efforts on behalf of the business community to improve the quality of life of Coloradans. We ask that the EPA maintain the 2008 ozone standard, set at 75 ppb, so that we may continue to focus efforts towards attaining the current standard.

If you have any questions, please feel free to contact Charles Ward, vice president of public affairs at the Denver Metro Chamber, at 303-620-8033 or [charles.ward@denverchamber.org](mailto:charles.ward@denverchamber.org).

Thank you for taking the time to consider this important economic issue.

Sincerely,



Kelly Brough  
Chief Executive Officer  
Denver Metro Chamber of Commerce



Tom Clark  
Chief Executive Officer  
Metro Denver EDC



Mizraim Cordero  
Director  
Colorado Competitive Council

CC: Senator Michael Bennet  
Senator Cory Gardner  
Congressman Ken Buck  
Congressman Mike Coffman  
Congresswoman Diana DeGette  
Congressman Doug Lamborn  
Congressman Ed Perlmutter  
Congressman Jared Polis  
Congressman Scott Tipton