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March 16, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

Wisconsin's manufacturers, utilities and drivers have all spent considerable time and money to give us the cleanest air our state has had in decades. Rather than celebrate this progress, your agency is considering rules that could have a dramatically negative impact on the Wisconsin economy. The proposed changes to the National Ambient Air Quality Standard (NAAQS) for ground-level ozone will be detrimental to the economic growth that we are seeing across the nation.

The negative stigma associated with nonattainment greatly affects businesses' decision making when considering choices on where to locate or expand. Wisconsin is especially in jeopardy of harm because of the strong role manufacturing plays in our economy. If the standard is set at 65 parts per billion, more than half of Wisconsin counties could be classified as nonattainment. Some of the largest and most populous counties in Wisconsin would be affected, making any business expansion in those areas difficult, if not impossible.

A recent study showed that moving from a 75 parts per billion (ppb) standard to 65 ppb could cost my state almost 25,000 jobs per year and $30 billion in gross state product from 2017-2040. In addition, the cost to comply with this new regulation would be $10 billion due to additional controls being placed on industry and requiring them to find offset emissions. Energy prices would increase and families would see their budgets squeezed further by yet another government regulation. Some are calling this proposal the "most expensive regulation ever."

The ozone standards were just tightened in 2008 and have not been implemented yet. This new regulation is just another to add to an ever growing list of costly mandates that are coming down from the federal government with little regard to their cost, impact on the economy or even how the standard can be achieved.

Given the extensive regulations that Wisconsin has already implemented to successfully reduce ozone precursors, control options are becoming more and more limited. The technologies needed to comply with the NAAQS proposal are unknown even to regulators. If additional control options are not developed in time, the uncertainty may cause businesses to forgo expansions or investments at their plants.

We realize that while the rule has been proposed at a 65 ppb standard, that you are also taking public comments regarding the possibility of setting the standard as low as 60 ppb. Please make note that if this were the case, nearly the entire State of Wisconsin would be designated nonattainment. The detrimental effects of such a regulation would be dramatic, and I hope that this is not actively being considered.

There is simply no good reason to risk the economic harm your proposal could inflict at this time of dramatically improved air quality. Please reconsider moving forward with your proposal and maintain the current standard of 75 parts per billion.

Sincerely,

Scott Walker
Governor