



June 16, 2015

Brian Deese
Assistant to the President and Senior Advisor
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500
(Sent via email: brian_c_deese@who.eop.gov)

Dear Mr. Deese:

Associated Governments of Northwest Colorado (AGNC) oppose the Environmental Protection Agency's (EPA) proposed Ozone regulations establishing a ground level ozone standard at or below 70 parts per billion. AGNC is a membership organization made up of local county and municipal governments from six counties in Northwest Colorado with elected officials serving as our Board of Directors.

The EPA is proposing to lower the National Ambient Air Quality Standards (NAAQS) for ground level ozone from the current 75 parts per billion to between 60-70 ppb (or lower) which will place a number of our counties out of compliance. The proposed standards will negatively impact our economies and communities as we could see job creation and growth come to a near halt under this onerous standard.

Communities in Northwest Colorado enjoy some of the best air quality to be found as they balance industry, commerce and tourism. People visit our region from around the world – they would not seek to visit this region if the air quality was poor. There are non-attainment areas in Colorado and across the country; it makes sense that new regulations would be established to bring those areas into compliance. The heavy handed approach proposed by EPA does nothing to improve air quality in “non-attainment” areas, it only serves to include more communities in that category rather than address the problem at hand.

Communities in Northwest Colorado have worked diligently to balance environment, water and air quality along with development and growth. The proposed ozone rules disrupt that balance and put our economies at risk with questionable benefits to air quality.

Economically, it is estimated that compliance costs for the state of Colorado would be as much as \$815 million and result in a projected \$16 billion loss in the Gross State Product by 2040. All this as a result of the implementation of an arbitrary rule that will not result in air quality improvements for our communities. Indeed, the proposed rule punishes those communities that have been good stewards of our environment.

AGNC members strongly oppose the implementation of the NAAQS as proposed by the EPA. The proposed rules do nothing to improve air quality, the new definition simply increases the areas of non-attainment. The cost of this regulation far exceeds the benefit to the American

public. Reducing and/or eliminating opportunities for our citizens to engage in meaningful employment by closing the doors to natural resource development, manufacturing and high-tech businesses in our most vulnerable communities is not an appropriate way to address the improvement of air quality. It makes more sense to find solutions to address air quality issues in areas of non-attainment than to punish the entire country and those in our state who have worked so hard to protect their environment through a balanced approach. We urge the EPA to revisit the proposed ground level ozone regulations and approach the issue in a more thoughtful manner that will make a difference where it is needed most. Thank you for your consideration of our comments.

Sincerely,



Jeff Eskelson, Chairman
Rio Blanco County



Martin Chazen, Vice-Chairman
City of Grand Junction