



The Honorable Shelly Moore Capito
U.S. Senate Committee on Environment
and Public Works
Chairwoman, Subcommittee on Clean Air
and Nuclear Safety
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Sheldon Whitehouse
U.S. Senate Committee on Environment
and Public Works
Ranking Member, Subcommittee on Clean Air
and Nuclear Safety
530 Hart Senate Office Building
Washington, DC 20510

Connecticut

Delaware

District of Columbia

The Honorable John Shimkus
U.S. House of Representatives
Committee on Energy and Commerce
Chairman, Subcommittee on Environment
2125 Rayburn House Office Building
Washington, DC 20515-6115

The Honorable Paul Tonko
U.S. House of Representatives
Committee on Energy and Commerce
Ranking Member, Subcommittee on
Environment
2463 Rayburn House Office Building
Washington, DC 20515-6115

Maine

Dear Chairpersons Capito and Shimkus and Ranking Members Whitehouse and Tonko:

Maryland

We write as Chair and Vice Chair of the Ozone Transport Commission (OTC) to express our opposition to H.R. 806 and S. 263, the Ozone Standards Implementation Act of 2017, as well as S. 452, Ozone Regulatory Delay and Extension of Assessment Length Act. If enacted, these bills could substantially harm public health by delaying the implementation of EPA's health-based ozone standard. We enclose a resolution approved by the OTC at its June 6, 2017 Spring Meeting expressing the OTC's opposition to these proposed bills.

Massachusetts

New Hampshire

New Jersey

The OTC, composed of twelve states and the District of Columbia, was established in the 1990 Clean Air Act Amendments to develop and implement regional approaches to reducing ozone levels. Our collaborative efforts-- under both Republican and Democratic Administrations--led to over twenty-five years of regional collaboration with clear positive impacts to our residents. Based on our ample experience addressing ozone attainment challenges, the proposed legislation would deprive Americans of the additional public health protection provided by EPA's 2015 ozone standard.

New York

Pennsylvania

Rhode Island

Our experience is that the important public health benefits of reduced ozone levels can be achieved through a combination of local and regional control measures, motor vehicle emission standards, and the Environmental Protection Agency's (EPA's) enforcement of the Clean Air Act's good neighbor provisions, which address interstate transport of ozone pollution. Through these measures, we have reduced ozone levels substantially in our region over the past quarter century, providing extremely significant public health benefits to our residents.

Vermont

Virginia

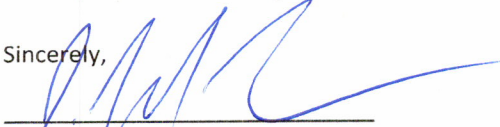
We believe strongly that protecting our public from the public health harms of ozone pollution is paramount.

David C. Foerter
Executive Director


Thank you for considering our views.

444 N. Capitol St. NW
Suite 322
Washington, DC 20001
(202) 508-3840
FAX (202) 508-3841
Email: ozone@otcair.org

Sincerely,



Jared Snyder
OTC Chair



Ben H. Grumbles
OTC Vice-Chair

Cc: Scott Pruitt, EPA Administrator



RESOLUTION ON TIMELY IMPLEMENTATION OF THE 2015 NATIONAL AMBIENT AIR QUALITY STANDARD FOR OZONE

Whereas, the Ozone Transport Commission (OTC), a multi-state organization created under the Clean Air Act (CAA), is required to advise the United States Environmental Protection Agency (EPA) on practical and cost effective strategies or measures, based on sound science, aimed to address the environmental and health problems associated with ground-level ozone transport that negatively impact the Northeast and Mid-Atlantic regions; and

Whereas, ozone is a significant health threat and oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) are precursors to the creation of ground-level ozone. Ozone is known to cause respiratory illnesses, exacerbate asthma-related episodes, compromise immune systems, and cause premature death, while NO_x can also lead to adverse respiratory health effects and VOCs can irritate the eyes, nose, and throat, cause headaches and nausea, damage internal organs, or cause cancer; and

Whereas, EPA's new ozone National Ambient Air Quality Standard (NAAQS), adopted in October 2015, is expected to provide important public health benefits in the Ozone Transport Region (OTR) and across the United States; and

Whereas, the latest peer-reviewed scientific evidence has demonstrated that the previous ozone NAAQS adopted in March 2008 is not adequately protective of human health and the environment; and

Whereas, implementation of the 2015 ozone NAAQS will require emission reductions both within and upwind of the OTR, reducing the interstate transport of ozone that contributes to ozone nonattainment in much of the OTR; and

Whereas, OTC research shows that regional NO_x reductions are the key to continued progress on reducing ozone across the East; and

Whereas, new regional NO_x reductions, including the Tier 3 clean fuel requirements, the updated Cross State Air Pollution Rule (CSAPR) and new local NO_x control measures, are on the way; and

Whereas, S. 263 and H.R. 806, the Ozone Standards Implementation Act of 2017, and S. 452, the Ozone Regulatory Delay and Extension of Assessment Length (ORDEAL) Act of 2017, will postpone the substantial public health and environmental benefits offered by the 2015 NAAQS for almost a decade; and

Whereas, existing provisions of the CAA already address the issues that appear to be motivating this legislation. The CAA's nonattainment area classifications provide areas with more difficult ozone pollution problems with more time to comply. Other mechanisms allow states the flexibility to adjust the minimum pollution reduction requirements based on the showing of need, success in lowering ozone levels, and the adoption of certain other measures; and

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

David C. Foerter
Executive Director

444 N. Capitol St. NW
Suite 322
Washington, DC 20001
(202) 508-3840
FAX (202) 508-3841
Email: ozone@otcair.org

Whereas, protecting our public from the public health harms of ozone pollution is paramount and we are on the verge of making significant additional progress on ground level ozone;

Therefore, it is resolved that the OTC opposes enactment of the Ozone Standards Implementation Act and the ORDEAL Act.

Adopted by the Commission on June 6, 2017

A handwritten signature in blue ink, appearing to read 'J. Snyder', is written over a horizontal line. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Jared Snyder, OTC Chair