

"The Voice of Florida Business Since 1920"

Associated Industries of Florida



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Barney T. Bishop III
President &
Chief Executive Officer

November 19, 2007

The Honorable Charlie Crist
Governor
State of Florida
PL 05, The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0001

Dear Governor Crist:

Associated Industries of Florida and its 10,000 members strongly advocate for preservation of the U.S. EPA's existing National Ambient Air Quality Standard (NAAQS) for ozone. We hope you will join us in urging the EPA to allow us to continue to improve local air quality in a manner that will not undermine the state's economic well being.

As you know, the EPA is proposing to tighten the current standard, which is still currently being implemented by state regulators, in a manner that will confer little, if any, environmental benefits. It will, however, add more disincentives to expand business operations in the state and exacerbate the current natural gas crisis by further increasing demand. Since natural gas prices began to climb in 2000, Florida has lost nearly 70,000 high wage manufacturing jobs, a decline of more than 14% in seven years. In Florida, where no counties are currently designated as being in non-attainment, and are therefore not targeted by regulators, we face the possibility of more than 2/3 of the state being re-designated by the EPA and therefore targeted by federal regulations. If EPA chooses its lowest recommended range of 60 parts per billion (ppb), 39 counties face reclassification, targeting the vast majority of the state's business and industry.

According to EPA's own studies, air quality in the United States continues to improve under the current rule, with emissions from the six criteria pollutants under the Clean Air Act (CAA) having dropped by more than 54% during the last generation. This improvement comes at a cost. According to EPA's own analysis, industry is required to spend \$9.7 billion per year to implement current obligations, which have not yet been fully implemented, and a new standard will cost businesses even billions more in compliance costs. Tighter ozone rules will result in higher energy costs, which Florida cannot afford. As you know, Florida is currently experiencing a great fiscal challenge. Floridians are in the midst of a property insurance and property tax crisis. Our state's housing market is in decline and the state is facing an additional round of cuts to balance the budget. We respectfully suggest that now is not the time to subject our state and its residents to these unnecessary and costly compliance costs.

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We hope you will support us on this very important issue and contact Administrator Johnson as soon as possible. Please don't hesitate to contact me if you have any questions or concerns regarding this very important matter to the business community of Florida.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barney Bishop III'.

Barney T. Bishop III
President & Chief Executive Officer

cc: EPA Administrator Johnson
Members, Florida Congressional Delegation