



Greater Phoenix  
Chamber of  
Commerce

October 15, 2010

Gregory Nudd  
US Environmental Protection Agency Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Re: PM-10 Nonattainment Area Plan for Maricopa County, Arizona

Dear Mr. Nudd:

On behalf of the Greater Phoenix Chamber of Commerce, I am writing to express concern regarding the proposed disapproval of the Maricopa Association of Governments (MAG) Five Percent Plan for PM-10 and the possible impacts such a decision may have on the Phoenix metropolitan area. As EPA is likely aware, the state of Arizona is currently experiencing significant economic struggles, including large numbers of home foreclosures, high levels of unemployment, and a budget crisis which continues to burden business and citizens through increased costs and reduced services. Should EPA's actions impose a conformity freeze, Arizona's economy will be further crippled. Loss of funds to support this region's transportation plans will endanger our ability to accommodate future growth and economic incentives that are important to retention and expansion of our business community. In light of the critical nature of EPA's pending decision, the Greater Phoenix Chamber of Commerce respectfully requests that EPA reconsider the deadline for final action on the MAG Five Percent Plan for PM-10.

With nearly 3,000 members consisting of small, medium and large businesses, the Greater Phoenix Chamber of Commerce places great value on the relationships with our government partners, including the MAG, Maricopa County Air Quality Division and Arizona Department of Environmental Quality. Along with these entities, we are committed to collaborating with all stakeholders to create a healthy living environment for the people of Arizona while working to maintain a positive and reasonable regulatory climate. In doing so, we appreciate the opportunity to engage in community efforts to work toward an acceptable plan for EPA which balances economic activity with public health.

Unfortunately, these efforts would be hampered if EPA issues final action on the Five Percent Plan by January 28, 2011. As the Arizona legislative session is scheduled to begin January 10, 2011 the opportunity to engage the legislature on this significant issue is limited. Additionally, clarification on a number of issues associated with the Plan and the necessary steps to move toward meeting approval is still pending, making it difficult to rework the Plan. An extension of time would allow MAG the opportunity to work with stakeholders to develop an approvable plan before any penalties are imposed that could further jeopardize Arizona's economic recovery. Many of the issues identified by EPA in the proposal to disapprove the plan can be resolved with productive dialogue and exchange between MAG, ADEQ, and EPA, and sufficient time should be allowed for this to occur.

Furthermore, in response to the disapproval of the exceptional events demonstrations, we would also like to reiterate the concerns expressed by others in regard to the EPA's exceptional events rule. Arizona, like other western states, is affected by certain natural conditions and events that increase PM-10 levels. We respectfully request that EPA review the exceptional events rule and develop guidance or an interim rule that would provide ADEQ with clarity on how to analyze exceptional events.

The Greater Phoenix Chamber of Commerce supports those activities that enhance the economic status of Phoenix and the surrounding region, believing that a strong economy results in a better life for all citizens. We hope collaborative efforts with EPA will identify a pathway toward continuing success for Maricopa County in improving local air quality. We are committed to our community partners to support these efforts and hope EPA will strongly consider our requests.

Sincerely,

A handwritten signature in black ink that reads "Todd Sanders". The signature is written in a cursive style with a large, sweeping flourish at the beginning.

Todd Sanders  
President and CEO  
Greater Phoenix Chamber of Commerce