



U.S. Environmental Protection Agency
EPA Docket Center, Air and Radiation Docket
Mail Code 28221T, 1200 Pennsylvania Avenue NW, Washington, DC 20460.

March 22, 2023

Regarding: Docket ID No. EPA-HQ-OAR-2015-0072

PUBLIC COMMENT- MICHIGAN CHAMBER OF COMMERCE

My name is Mike Alaimo and I currently serve as the Director of Environmental and Energy Affairs at the Michigan Chamber of Commerce. I appreciate the opportunity to provide comment on the Environmental Protection Agency's (EPA's) proposed rule regarding the reconsideration of the National Ambient Air Quality Standards (NAAQS) for particulate matter (PM) 2.5.

As the Great Lakes State's leading statewide business advocacy organization, the Michigan Chamber of Commerce is on the job every day, standing up for job providers in the legislative, political and legal arenas while working to build a stronger Michigan for all. We are the unified voice of approximately 5,000 member businesses of every size and industry in all 83 counties as well as trade associations and local chambers of commerce, collectively employing over a million Michiganders.

Michigan is proud to be home to a dynamic and resilient business community, which ranges from farm and food production to hospitality and tourism to manufacturers creating everything from cars to pharmaceuticals. All of these industries rely on workable federal, state and local regulations that safeguard our environment while ensuring businesses have the tools and flexibility they need to prosper.

This balanced approach is not reflected in the EPA's NAAQS PM2.5 proposal. There are still areas of the U.S. that are in nonattainment of the current NAAQS PM2.5 standards and further tightening these standards to the levels contemplated in the EPA's proposed rule would greatly expand the number of nonattainment areas, including a significant part of Michigan. Businesses in our state would have to spend millions of dollars annually to comply with the revised regulations, and permitting delays and cancellations would stifle infrastructure projects and facility expansions, which would harm businesses up and down our supply chains that are just now rebounding from the disruptions caused by the pandemic. Additionally, nonattainment designations would have a deleterious impact on our state's industrial operations and require expensive retrofits and emission offset credits. The vast majority of PM2.5 emissions, over 84 percent, now come from non-point sources such as wildfires and road dust. These non-point emission sources are much more difficult for individual states and regions to control. By contrast, only 16 percent of PM2.5 emissions come from industrial sources and power plants, with further improvements likely with the implementation of existing laws and as cleaner energy sources continue to come online.



These direct and indirect impacts are especially disastrous for Michigan's small businesses. According to the U.S. Small Business Administration, Michigan is home to more than 902,000 small businesses that employ nearly 2 million Michiganders. These small businesses make up more than 90% of the Michigan Chamber of Commerce's membership and are an essential economic driver across the state, bolstering all 83 counties. Many of these companies operate on thin margins and do not have the resources to comply with yet another layer of federal regulation.

It is our view that federal, state and local regulators should not advance policies and rules that would lead to a curtailment of investment and innovation across the U.S. economy. Private sector innovation has played a big role in the environmental improvements our nation has secured over the last several decades, and our business community is dedicated to making sure that trend continues. We urge EPA to reconsider its NAAQS PM2.5 proposal and refrain from imposing additional regulatory burdens on Michigan businesses and consumers.

Sincerely,

Mike Alaimo
Director, Environmental and Energy Affairs
Michigan Chamber of Commerce