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The Honorable William Jefferson Clinton
President, United States of America
The White House
Washington, D.C.

Mr. President

As an active advocate for urban and small business affairs, former public servant and concerned citizen, I join the more than 220 members of Congress, 75 mayors and 27 governors in opposing the proposed EPA change to ambient air quality standards. The primary basis for my opposition to this proposed change is the potential economic impact on urban reinvestment and revitalization that is currently underway. I urge you to direct EPA Administrator Browner to abandon this hasty measure in favor of prudence through proper, objective due diligence.

My discussions and research in the investment community conclude that approximately ten billion dollars worth of urban investment capital are in jeopardy as the result of proposed EPA rules. As a result of the efforts of community groups and other entities interested in urban revitalization, banks and other national financial institutions have put together a multi-billion dollar pool of assets designed to be a revitalization tool for the urban landscape. It is my strong contention that the very viable and effective programs designed to curb urban flight, reform welfare, improve education, and promote strong economies will be stalled as a result of the proposed NAAQS change. The unintended victims are numerous.

As a former public policy maker and implementer with many years in the civil rights arena, and 30 years as a supporter of affirmative action enforcement, I have witnessed a broad range of regulations and policies at the federal, state and local levels, some of which have forever changed the face of America's workforce and entrepreneurial ranks. Most were good policies. But I have also witnessed some dismal policy initiatives. The EPA's proposed changes to the air quality standards falls in the latter category. With one careless stroke of the pen, EPA could eradicate the fragile and tenuous progress being made in cities around the nation to move into an era of sustainable economic and environmental development as well as self-sufficiency.

Based on this experience, I am convinced that the proposed rule change would turn such job-creating activity as small manufacturing concerns, dry cleaners and beauty salons into illegal -- and, therefore, un-bankable -- enterprises. The result will be a withdrawal of available funding because the uncertainty created by the proposed ambient air quality rules

introduce a specter of future government action which would terminate or severely compromise the borrower's ability to repay.

I applaud the diligent efforts of EPA to make our air cleaner and our environment safer. I am the father of five children, and strongly support clean air. However, objective scientists have concluded that the current standards are beginning to prove effective. We should give the existing standards a chance to have full impact before adding costly, more stringent requirements.

The fragile partnerships being formed in the urban centers with local government, churches, activists and banking industry are relying on being able to reasonably predict the future. These rules will introduce so much uncertainty that certain local reform movements underway could experience a still-birth. For example, the success of the welfare reform movement underway around the country will be largely dependent upon the ability of local governments and businesses to take up the slack. The record shows that the small business sector hires 80% of the nation's workforce and is the powerful engine that drives America's economy. More than 90 percent of those small businesses operate in major metropolitan areas. The small business owners will be one of the keys to making welfare reform work. They will have to provide jobs to adults moving off welfare and to their teenage children who are already at risk, but who may learn through work experience the value and skill of self-sufficiency.

Our leaders must act like men and women of thought, and think like men and women of action. The EPA proposal presently at hand is not consistent with this responsibility. EPA should reaffirm the existing ozone (smog) standard to allow time to assess the impact of current pollution control programs before imposing more stringent requirements. EPA must do this for the sake of the unintended victim.

I thank you for your attention, and respectfully request an opportunity to discuss this very serious matter with you and your staff at your earliest convenience.

Respectfully,

Arthur A. Fletcher, ~~PHD~~