

David
Dickinson/DC/USEPA/US
06/06/2007 01:00 PM

To "Nancy Kruger"
cc
bcc
Subject Re: NACAA Letter Objecting to Deadline Extension on CA
Waiver

thanks - please also send this to: a-and-r-docket@epa.gov

David Dickinson
202/343-9256
fax - 343-2804
Dickinson.David@EPA.GOV
"Nancy Kruger" <nkruger@4cleanair.org>

"Nancy Kruger"
<nkruger@4cleanair.org>
06/06/2007 12:49 PM

To David Dickinson/DC/USEPA/US@EPA
cc
Subject NACAA Letter Objecting to Deadline Extension on CA
Waiver

David,
Here's an electronic version of our letter. Do I also need to submit this directly to the docket?
-Nancy

Nancy Kruger
Deputy Director
National Association of Clean Air Agencies
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CA Waiver-NACAA Letter Opposing Deadline Ext-Final060607.pdf

EPA-2403

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S. William Becker

June 6, 2007

David Dickinson
Compliance and Innovative Strategies Division (6405J)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Dickinson:

The National Association of Clean Air Agencies (NACAA) is aware that the Alliance of Automobile Manufacturers (AAM) has submitted formal requests to the U.S. Environmental Protection Agency (EPA) for 1) a 30-day extension – from June 15, 2007 to July 16, 2007 – to the public comment period EPA has established on the California State Motor Vehicle Pollution Control Standards; Request for Waiver of Federal Preemption, as announced in the *Federal Register* on April 30, 2007 (72 FR 21260) and 2) an additional 45-day formal response period after the comment deadline. NACAA opposes both of these specific requests, as well as any extension at all to the June 15, 2007 deadline and urges EPA to deny AAM's requests.

California's request for a waiver of federal preemption under Section 209(b) of the Clean Air Act for the state's new motor vehicle emission standards to control greenhouse gases – to take effect with the 2009 model year – was submitted to EPA on December 21, 2005. AAM and others with an interest in this matter have had the past 17 months to review this request. Additional time beyond June 15, 2007 is unwarranted and will serve only to further prolong already overdue final action by EPA.

At EPA's May 22, 2007 public hearing, NACAA testified in strong support of prompt approval by EPA of California's waiver request. Today, on behalf of NACAA, I would like to reiterate that support and advise you of our objection to any delay in the deadline for public comment. NACAA will submit written comments on the waiver request to EPA by the June 15, 2007 deadline.

Sincerely,



S. William Becker