

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

June 15, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
McCarthy.gina@epa.gov

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines.


Dear Administrator McCarthy:

The undersigned, on behalf of the Commonwealth of Massachusetts, hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

The Massachusetts Department of Environmental Protection (MassDEP) considers this petition critical to our ability to maintain the public health standard for ozone and we urge EPA to act expeditiously to propose Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines.

Should you have any questions, please call my office at MassDEP at 617 292-5856.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Martin Suuburg". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Martin Suuburg
Commissioner

cc: Christopher Grundle, Director, Office of Transportation and Air Quality;
Grundle.christopher@epa.gov

Sheri Hanizavareh , South Coast Air Quality Management District;
shanizavareh@agmd.gov



July 7, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
McCarthy.gina@epa.gov

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines.

Dear Administrator McCarthy:

The Coalition for Clean Air hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

The mission of The Coalition for Clean Air is to restore healthy air for all Californians. Millions of Californians will continue to breathe unhealthy air unless we drastically reduce emissions from the trucks that carry goods in our state. Because a significant percentage of the trucks on California roads are based in other states, we rely on USEPA to set a health-protective ultra-low NOx standard. We believe new-truck NOx emissions can be reduced 90% below the 2010 engine standard, and timely federal action to implement a national standard is essential.

Respectfully,

Bill Magavern
Policy Director

cc: Christopher Grundler, Director, Office of Transportation and Air Quality;
Grundler.christopher@epa.gov

Sheri Hanizavareh, South Coast Air Quality Management District;
shanizavareh@aqmd.gov



- San Bernardino County Transportation Commission • San Bernardino County Transportation Authority
- San Bernardino County Congestion Management Agency • Service Authority for Freeway Emergencies

July 18, 2016

The Honorable Gina McCarthy
Administrator, United States Environmental Protection Agency

William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines.

Dear Administrator McCarthy:

The undersigned, on behalf of San Bernardino Associated Governments (SANBAG), hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District (SCAQMD), Pima County Department of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Department of Energy and Environmental Protection, Delaware Department of Natural Resource and Environmental Control, Division of Air Quality, Washoe County Health District, Air Quality Management (Nevada), New Hampshire Department of Environmental Services, New York City Department of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Department of Ecology, and Puget Sound Clean Air Agency.

SANBAG is the Council of Governments and County Transportation Commission for San Bernardino County, California. We are the largest county geographically in the continental United States, with a population of 2.1 million. Our membership consists of 24 cities and the County of San Bernardino. We are also part of the six-county region represented by the Southern California Association of Governments (SCAG), the largest Metropolitan Planning Organization (MPO) in the country. The South Coast Air Basin covers the southwestern portion of San Bernardino County.

As you are aware, the South Coast Air Basin remains an extreme non-attainment area for ozone. Although the Basin has made astonishing progress on improvements to air quality since 1990, large areas of the Basin do not meet current ozone standards. The San Bernardino County portion of the Basin continues to have the most significant violations of the standards. See attached excerpt from the California Air Resources Board (ARB) draft Mobile Source Strategy (Figure 3 – the San Bernardino County portion is in the northeast corner of the South Coast Air Basin). The lower graphic shows the 8-hour ozone contours for 2014, with San Bernardino County showing, by far, the most area with ozone at 95 parts per billion and greater.

At the same time, a substantial portion of San Bernardino County's economy is based on logistics, distribution, and freight transportation. We serve the regional and national economies

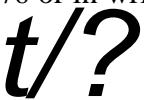
The Honorable Gina McCarthy
July 18, 2016
Page 2 of 2

by being a gateway for goods to and from the Los Angeles and Long Beach port complex. Some 40% of the nation's containerized freight comes through these ports, and an estimated 75% of that flows out of the state, the bulk of which flows through San Bernardino County.

In addition to being the freight gateway to and from the rest of the nation, we are home to over 200 million square feet of warehousing space. The density of trucks on our freeways, the number and length of freight trains passing through our area, and the number of our residents employed in logistics businesses attest to the importance of logistics to the economic well-being of our citizens.

It is not surprising, then, that San Bernardino County has a high level of interest in both improving air quality and supporting its significant logistics-based economy. We understand the potential benefits and importance of EPA's adoption of an ultra-low NOx exhaust emission standard for on-road heavy-duty trucks and engines. In addition to our locally-based trucks, we have many trucks coming through our area from other states, and attainment of EPA's ozone standards will not be possible without reducing the emissions of these trucks as well. In addition, imposition of a California-only ultra-low NOx standard would unfairly burden our logistics businesses, which serve as a conduit for goods to and from the rest of the U.S. The nation benefits from the work that our citizens and businesses do here, and it is logical that all the states should be partners together to further clean up tailpipe emissions. This will help speed up attainment for other states as well.

We would be delighted to discuss these matters further, at your convenience. Feel free to contact me at (909) 884-8276 or in writing at 1170 W. 3rd Street, 2nd Floor, San Bernardino CA 92410.

Sincerely,


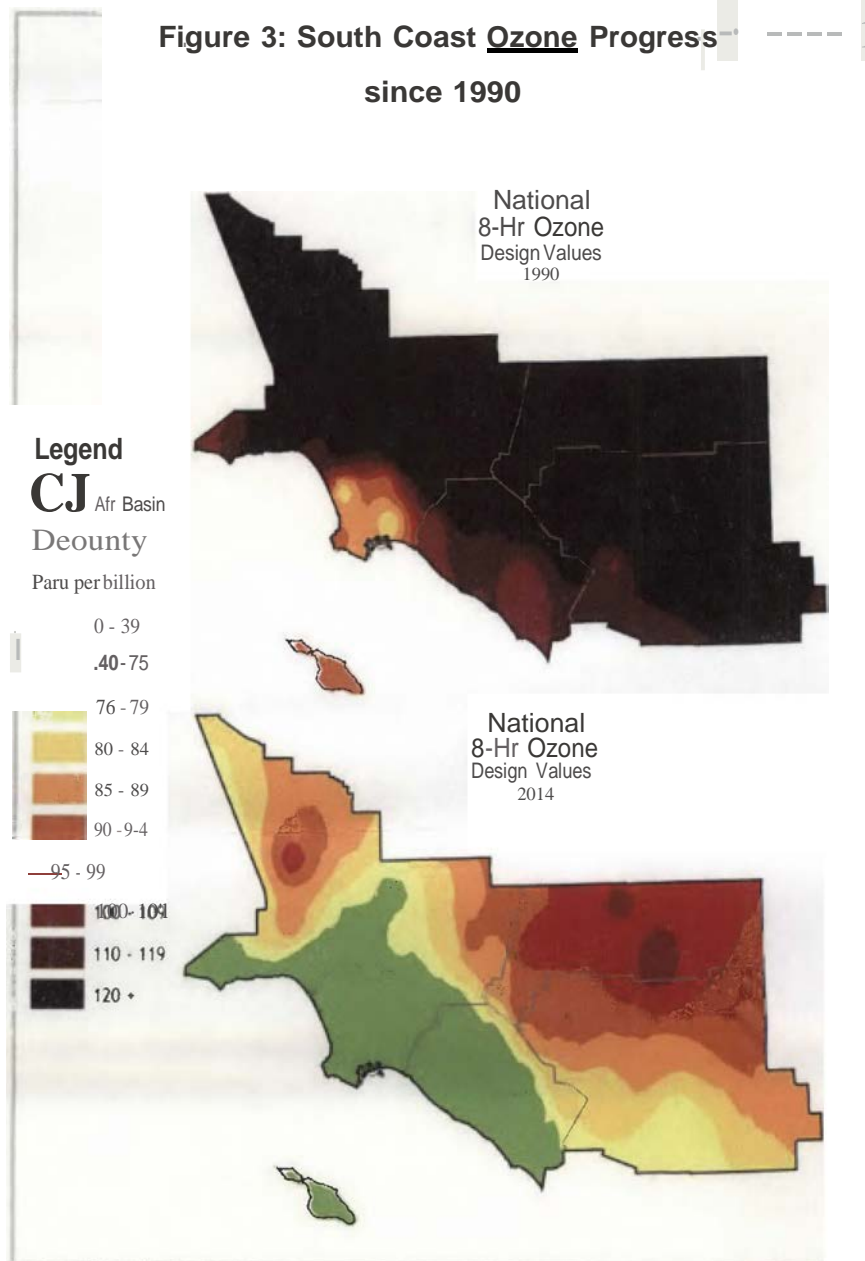
Dr. Raymond W. Wolfe
Executive Director
San Bernardino Associated Governments

CC: San Bernardino County Congressional Delegation
Christopher Grundler, Director, Office of Transportation and Air Quality
Sheri Hanizavareh, South Coast Air Quality Management District
Janice Rutherford, San Bernardino County Board of Supervisors, South Coast Air Quality Management District Member
Larry McCallon, Mayor City of Highland, South Coast Air Quality Management District Member
Paul Eaton, Mayor City of Montclair, Southern California Association of Governments Delegate
Ed Graham Council Member City of Chino Hills, Southern California Association of Governments Delegate
Curt Hagman, San Bernardino County Board of Supervisors, Southern California Association of Governments Delegate
Jon Harrison, Mayor Pro Tern City of Redlands, Southern California Association of Governments Delegate
Bill Jahn, Mayor Pro Tem City of Big Bear Lake, Southern California Association of Governments Delegate
Ray Marquez, Vice Mayor City of Chino Hills, Southern California Association of Governments Delegate
Ryan McEachron, Council Member City of Victorville, Southern California Association of Governments Delegate
Julie Hackbarth McIntyre, Mayor City of Barstow, Southern California Association of Governments Delegate
Ray Musser, Mayor City of Upland, Southern California Association of Governments Delegate
Frank Navarro, Council Member City of Colton, Southern California Association of Governments Delegate
Edward Paget, Mayor City of Needles, Southern California Association of Governments Delegate
Deborah Robertson, Mayor City of Rialto, Southern California Association of Governments Delegate
Barbara Stanton, Mayor Town of Apple Valley, Southern California Association of Governments Delegate
Alan Wapner, Council Member City of Ontario, Southern California Association of Governments Delegate
Diane Williams, Council Member City of Rancho Cucamonga, Southern California Association of Governments Delegate

Air Quality Standards

California has made significant progress in improving air quality through existing State and local air district control programs. Figure 3 illustrates the progress that has occurred since 1990 in the South Coast, the region with the highest ozone levels in the State. Twenty-five years ago the entire South Coast region violated the current 8-hour ozone standard of 75 ppb. Today, concentrations have declined 45 percent, and 40 percent of the population lives in communities that meet the standard. Nonetheless, the South Coast still has the highest ozone levels in the nation while the San Joaquin Valley has the greatest PM_{2.5} challenge.

Figure 3: South Coast Ozone Progress since 1990



OFFICE OF THE COMMISSIONER

New York State Department of Environmental Conservation
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Office of the
EXECUTIVE SECRETARY

Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines

Dear Administrator McCarthy:

The New York State Department of Environmental Conservation (DEC), hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Department of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Department of Energy and Environmental Protection, Delaware Department of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Department of Environmental Services, New York City Department of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Department of Ecology, and Puget Sound Clean Air Agency.

DEC supports the petition as a more stringent NOx emissions standard for on-road heavy duty trucks and engines will help New York attain the 2008 and 2015 ozone standards.

Sincerely,



Basil Seggos
Commissioner

- c: Christopher Grundler, Director, Office of Transportation and Air Quality
- Sheri Hanizavareh, South Coast Air Quality Management District
- Jared Snyder, Deputy Commissioner, Air Resources, Climate Change & Energy, NYSDEC
- Steven Flint, Director, Division of Air Resources, NYSDEC



Department of
Environmental
Conservation



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF THE DIRECTOR

235 Promenade Street, Room 425
Providence, Rhode Island 02908

June 13, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission
Standards for On-Road Heavy-Duty Trucks and Engines.

Dear Administrator McCarthy:

The undersigned, on behalf of the Rhode Island Department of Environmental Management, hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

Additional NOx reductions from heavy duty vehicles is important to RI and our efforts to improve air quality in the state. RI will likely be designated nonattainment for the new, 2015 ozone standard. By 2020, the Ozone Transport Commission projects on-road heavy-duty vehicles to be the 2nd largest source of NOx in the Ozone Transport Region. RI's ozone air quality issues are largely due to transported emissions from upwind states. Emission reductions from upwind states, including mobile sources, will be necessary if we are to improve RI's air quality.

If there are any questions concerning this letter, please contact Douglas McVay, Chief of our Office of Air Resources at 401-222-4700, x-7011 or doug.mcvay@dem.ri.gov.

Respectfully submitted,


Janet Coit
Director

cc: Christopher Grundler, Director, Office of Transportation and Air Quality;
Grundler.christopher@epa.gov

Sheri Hanizavareh, South Coast Air Quality Management District; shanizavareh@aqmd.gov



Vermont Department of Environmental Conservation

Commissioner's Office

One National Life Drive, Main 2 [phone] 802-828-1556

Montpelier, VT 05620-3520 [fax] 802-828-1541

Agency of Natural Resources

July 11, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
McCarthy.gina@epa.gov

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines.

Dear Administrator McCarthy:

The undersigned, on behalf of the Vermont Department of Environmental Conservation, hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

Vermont, as a part of the Ozone Transport Region, is impacted not only by NOx pollution from local sources, but by pollutants, to which NOx is a precursor, transported from hundreds of miles away that contribute to elevated ozone and fine particulate levels. Vermont urges EPA to begin rulemaking without delay to lower NOx standards for heavy duty trucks, which are the second largest source of NOx emissions in the Ozone Transport Region.

If you have any questions regarding this letter, please contact Heidi Hales at (802) 498-7338 or heidi.hales@vermont.gov.

Respectfully submitted,

A handwritten signature in black ink that reads "Alyssa B. Schuren".

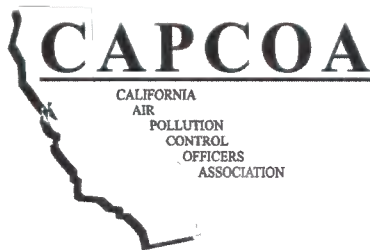
Alyssa Schuren

Commissioner

Vermont Department of Environmental Conservation
Montpelier, Vermont

cc: Christopher Grundler, Director, Office of Transportation and Air Quality;
Grundler.christopher@epa.gov

Sheri Hanizavareh, South Coast Air Quality Management District; shanizavareh@aqmd.gov



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Dave Johnston
El Dorado County AQMD

Robert Kard
San Diego County APCD

Wayne Nastri
South Coast AQMD

Seyed Sadredin
San Joaquin Valley APCD

EXECUTIVE DIRECTOR

Alan Abbs
alan@capcoa.org

November 7, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust
Emission Standards for On-Road Heavy-Duty Trucks and Engines

Dear Administrator McCarthy:

The California Air Pollution Control Officers Association, representing the 35 local air pollution control districts and air quality management districts in California, joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

In many areas of California, heavy duty trucks contribute the largest share of ozone precursors, and while the state is moving forward with an ultra-low NOx standard for trucks sold in California, trucks purchased outside of California and operating in-state are not subject to the state's emission standards. Without a nationwide ultra-low NOx emission standard, many air districts in California will thus be unable to meet upcoming federal ozone standards.

Respectfully submitted,

W. James Wagoner
President

cc: Christopher Grundler, Director, Office of Transportation and Air
Quality; Grundler.christopher@epa.gov

Sheri Hanizavareh, South Coast Air Quality Management District;
shanizavareh@aqmd.gov

August 23, 2016

The Honorable Gina McCarthy, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
McCarthy.gina@epa.gov

Re: Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission
Standards for On-Road Heavy-Duty Trucks and Engines

Dear Administrator McCarthy:

The undersigned, on behalf of the Sacramento Metropolitan Air Quality Management District, hereby joins the above-cited Petition filed on June 3, 2016, by South Coast Air Quality Management District, Pima County Dept. of Environmental Quality (Arizona), Bay Area Air Quality Management District (California), Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resource and Environmental Control, Division of Air Quality, Washoe Co. Health District, Air Quality Management (Nevada), New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection (New York), Akron Regional Air Quality Management District (Ohio), Washington State Dept. of Ecology, and Puget Sound Clean Air Agency.

Respectfully submitted,



Larry F. Greene
Executive Director/Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District
Sacramento, CA

cc: Christopher Grundler, Director, Office of Transportation and Air Quality;
Grundler.christopher@epa.gov

Sheri Hanizavareh, South Coast Air Quality Management District;
shanizavareh@aqmd.gov