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January 22, 2020

Andrew Wheeler, Administrator
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code:1101A
Washington, DC 20460

Re: Comment Deadline Extension Request for EPA's ANPR: Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards Docket ID No. EPA-HQ-OAR-2019-0055

Honorable Administrator Wheeler:

On behalf of the NTAA, I am writing to respectfully request that the U.S. Environmental Protection Agency (EPA) extend the current public comment period ending February 20, 2020, on EPA's Advance Notice of Proposed Rulemaking: Control of Air Pollution From New Motor Vehicles: Heavy-Duty Engine Standards (aka, Cleaner Trucks Initiative, or CTI) by an additional 60 days.

The NTAA is the second largest national Tribal member-based organization with 149 principal member Tribes. The organization's mission is to advance air quality management policy and programs, consistent with the needs, interests, and unique legal status of Indian Tribes.


The current 30-day comment period is unusually short for such a complex initiative, particularly one that is not under court order. The complexity and technical content of the CTI necessitates additional time by NTAA to review and evaluate the potential impacts to Indian Country.

The NTAA finds that a 60-day extension would provide the requisite time to collect feedback from our membership Tribes and Tribal community, and capture it into a thorough and responsive set of comments and recommendations concerning the CTI. Such comments and recommendations could lead to a final rule with positive impacts to air quality throughout the nation and Indian Country.

Thank you for consideration of this reasonable request. If you have any questions regarding this request, please contact the NTAA Project Director, Andy Bessler at andy.bessler@nau.edu.



Sincerely,



Wilfred J. Nabahe
Chairman
National Tribal Air Association
Executive Committee

Cc: Anne Idsal, OAR Acting Assistant Administrator
Brian Nelson, OTAQ Assessment and Standards Division
Pat Childers, OAR