

August 10, 2005

Dr. David T. Allen
Chair, Committee on State Practices in Setting
Mobile Source Emission Standards
National Research Council
500 Fifth Street, NW
Washington, D.C. 20001

Dear Dr. Allen:

As the *Committee on State Practices in Setting Mobile Source Emission Standards* concludes its deliberations, we are writing to underscore several points raised by Northeast state representatives at the April 14th Boston meeting and to emphasize how important this issue is to the Northeast states.

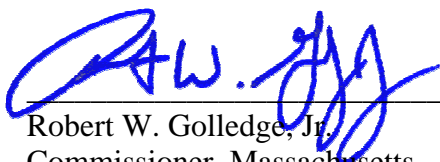
First, the authority to adopt the California vehicle emissions standards in-lieu of the federal standards under Section 177 of the Clean Air Act is a long-standing right that has now been exercised by most states in the Northeast. It is one part of a comprehensive emission strategy that includes stringent emission reductions from all the sectors that contribute to our air pollution. Its application has resulted in substantial reductions in smog-forming pollutants in our region over the past decade and will continue to do so in the future. At the April 14th meeting, automobile manufacturing representatives suggested that this authority should be curtailed by the inclusion of a waiver requirement. We oppose any revision to Section 177 that would curtail our States' ability to adopt the California emissions standards for the following reasons.

While federal and state air pollution control programs have improved the quality of life for Northeast residents, millions of our citizens still live in areas with unhealthy levels of pollution. Motor vehicles emit approximately half of the pollutants that contribute to unhealthful air quality in our region, especially in urban areas. Our modeling indicates that pollution from mobile sources will continue to grow, thus posing an increased health and environmental risk in the Northeast. It is important to note that motor vehicles emissions are an increasingly significant share of total emissions in states outside of the Northeast. Absent further reductions from the federal motor vehicle program, states will need to retain the option to exercise the authority to implement the California program - as it is the most effective tool available for reducing mobile source emissions.

The use of Section 177 is consistent with our States' need to require best available control technologies for all sectors that contribute to air pollution problems. There is broad bi-partisan

support in our region for retaining the authority Congress gave states to adopt the more protective California low emission vehicle standards. We urge the Committee, as it concludes deliberations, to support our authorization to participate in the California light and heavy-duty programs as it is currently set out in the Clean Air Act.

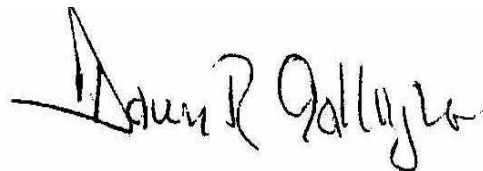
Sincerely,



Robert W. Gollidge, Jr.
Commissioner, Massachusetts
Department of Environmental Protection



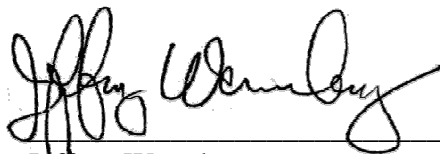
Carl Johnson
Deputy Commissioner,
New York State Department of
Environmental Conservation



Dawn R. Gallagher
Commissioner, Maine
Department of Environmental Protection



Gina McCarthy
Commissioner, Connecticut
Department of Environmental Protection



Jeffrey Wennberg
Commissioner, Vermont
Department of Environmental Conservation