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December 9, 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: **San Joaquin Valley Unified Air Pollution Control District Petition
Requesting that EPA Adopt New National Standards for On-Road
Heavy-Duty Trucks and Locomotives Under Federal Jurisdiction**

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 22, 2016 by San Joaquin Valley Unified Air Pollution Control District.

Since its adoption, the Clean Air Act has led to significant improvements in air quality and public health benefits throughout California. Despite achieving emissions reductions through decades of implementing stringent stationary and mobile regulatory control programs, nitrogen oxide (NOx) emissions, the primary precursor for both ozone and fine particulates (PM2.5), must still be significantly reduced throughout much of the state in order to attain the latest federal ozone and PM2.5 standards. 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. In addition, California has an extensive rail network, but is not able to achieve needed emission reductions from in-use locomotives. California businesses are subject to the toughest air regulations in the nation, and much of the needed reductions can only come from mobile sources that fall under the EPA's legal jurisdiction. Without a nationwide ultra-low NOx emission standard for heavy duty trucks and a nationwide requirement for in-use emission standards for locomotives, 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
Seyed Sadredin, Executive Director/APCO, San Joaquin Valley APCD



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