

February 6, 2014

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Dear Administrator Shelanski and Administrator McCarthy:

On behalf of the National Association of Clean Air Agencies (NACAA), we urge you to complete your review and finalize the Tier 3 vehicle emissions and gasoline standards by no later than February 28, 2014 so that the program will take effect with the 2017 model year. It is critical that there be no delay in the public health, air quality and economic benefits of these standards. NACAA is the organization of air pollution control agencies in 43 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the United States. These comments are based upon that experience. The views expressed in this document do not necessarily represent the positions of every state and local air pollution control agency in the country.

NACAA strongly supports the Tier 3 regulations proposed by EPA on May 21, 2013, as we articulated in our June 28, 2013 written comments and our testimonies provided at the agency's April 24 and April 29, 2013 public hearings. The program includes tailpipe emission standards – applicable to passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles – to be phased in between model years 2017 and 2025, as well as an average gasoline sulfur standard of 10 parts per million (ppm) to take effect January 1, 2017. As we said then, and as we are equally certain now, we know of no other strategy that can achieve such substantial, immediate and cost-effective reductions in air pollution as Tier 3. State and local air quality agencies are counting on these emission reductions to achieve and sustain our clean air goals and we are counting on EPA to issue the final rule by the end of February to ensure that the provisions will be implemented on schedule.

More than 158 million people across the country live in areas where the air they breathe violates at least one of the health-based National Ambient Air Quality Standards (NAAQS). The passenger cars and light trucks to which Tier 3 will apply are primary contributors to these violations, particularly those related to ozone and fine particulate matter, both of which have serious and well-documented adverse health and welfare impacts.

The emission reductions that will result from Tier 3, as proposed by EPA, will benefit the citizens of every state and locality across the nation. In a study our association published while EPA was preparing the Tier 3 proposal NACAA estimated that the overnight reductions in emissions of nitrogen oxides (NO_x) from the existing fleet, due to the use of Tier 3's low-sulfur gasoline and the associated improved effectiveness of NO_x controls on existing vehicles, will be nearly 300,000 tons. This is equivalent to taking 33 million cars off our nation's roads in 2017 when the program will begin. By 2030 and beyond, the Tier 3 program will yield additional substantial reductions in onroad mobile source emissions of NO_x, volatile organic compounds, carbon monoxide, benzene and other toxic air pollutants.

These huge benefits come at a modest cost – less than a penny a gallon for the low-sulfur gasoline component of the program and less than \$150 per vehicle in 2025 for the Tier 3 vehicle emission control technologies. Meanwhile, the cost-effectiveness of Tier 3 is high, at \$4,500 per ton of hydrocarbon (NMOG)+NO_x removed in 2030, which is far more cost effective than most other potential NO_x reduction measures being considered in various part of the country.

In addition, Tier 3 will provide new employment opportunities, including 1,000 front-end design and engineering jobs and 6,000 construction jobs at refineries. These 7,000 new refinery jobs represent a 10-percent increase in employment in the petroleum sector compared to the 65,000 workers employed in 2009.

Finally, the Tier 3 program is feasible today. The vehicle technologies are consistent with, or nearly identical to, those on current California cars. In addition, California's gasoline already meets a standard of 10 ppm sulfur, on average, and gasoline in the European Union and Japan is subject to a 10-ppm sulfur cap, while China has adopted requirements for 10 ppm sulfur to take effect in 2017.

EPA's Tier 3 rule is critical to efforts across the country to attain and maintain health-based air quality standards as well as to make meaningful strides in addressing toxic air pollution, regional haze and the eutrophication of water bodies. It is, therefore, imperative that OMB expedite its review of the Tier 3 rule and that EPA issue the final regulation by the end of February 2014 so that it can be implemented on schedule, beginning with the 2017 model year, and our nation will reap its many important benefits.

Sincerely,



Barry R. Wallerstein
(South Coast Air Quality Management District)
Co-Chair
NACAA Mobile Sources and Fuels Committee



Nancy L. Seidman
(Massachusetts)
Co-Chair
NACAA Mobile Sources and Fuels Committee

cc: Robert Perciasepe (EPA)
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