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S. William Becker

July 31, 2007

Dear Representative:

As the House of Representatives meets to consider H.R. 3221, the *New Direction for Energy Independence, National Security and Consumer Protection Act*, the National Association of Clean Air Agencies (NACAA) applauds you for taking important steps to increase energy efficiency, reduce greenhouse gases and begin to address our dependence on foreign oil. However, we think the bill can be improved in several important areas. Specifically, we strongly urge that H.R. 3221 include: 1) the Markey-Platts Corporate Average Fuel Economy (CAFE) bill; 2) the Udall-Platts Renewable Electricity Standard bill; 3) safeguards against air pollution increases from any comprehensive renewable fuels amendment; and 4) provisions to retain the ability of states and localities to adopt more stringent standards than minimum federal requirements. NACAA represents air pollution control agencies in 54 states and territories and over 165 major metropolitan areas across the country.

First, NACAA recommends that motor vehicle CAFE standards be substantially strengthened and made more stringent over time as technology advances. Accordingly, we urge that H.R. 3221 be amended to include the Markey-Platts proposal that increases average fuel economy for both cars and light trucks to 35 miles per gallon (mpg) by 2018 and provides for more stringent standards thereafter. According to a 2002 report of the National Academy of Sciences, commercially available technologies exist that could increase the average fuel economy of cars and trucks to 37 mpg within 10-15 years. In addition, increasing CAFE standards to the Markey-Platts levels will substantially cut greenhouse gas emissions, reduce our dependence on foreign oil and save consumers billions of dollars.

Second, NACAA strongly supports amending H.R. 3221 by including H.R. 969, the Udall-Platts Renewable Electricity Standard, requiring utilities to generate at least 20 percent of their electricity nationwide from renewable resources such as wind, biomass, geothermal and solar power by 2020. The electricity sector is the largest source of greenhouse gas emissions in the U.S. and increasing the amount of electricity generated from renewable sources will significantly

reduce greenhouse gas emissions from this sector. More than twenty states have already adopted a Renewable Electricity Standard, and others are considering taking action.

Third, to the extent that H.R. 3221 is amended to expand renewable fuels production, it is essential that there be appropriate safeguards to ensure that air quality is not degraded. While a mandatory biofuels program can offer important benefits – ranging from improved energy security to reduced greenhouse gases – it can also lead to unacceptably high levels of nitrogen oxides and volatile organic compounds, which form ozone and/or fine particulates (PM_{2.5}). This is especially troubling in light of the fact that almost 150 million people live in areas that do not attain the 8-hour ozone or PM_{2.5} health-based ambient air quality standards. NACAA urges that any renewable fuels program included in H.R. 3221 include anti-backsliding provisions preventing increases in air pollution emissions.

Finally, NACAA strongly opposes any efforts to preempt states or localities from adopting measures more stringent than minimum federal requirements. States and localities have been leaders in addressing global warming and other energy and environmental problems. Indeed, they have been laboratories of innovation. It is essential that they retain these important rights. Accordingly, we urge that you not include any provisions that would preempt states or localities from adopting more stringent provisions than the federal minimum requirements.

We thank you for considering our thoughts on these very important issues as you consider H.R. 3221.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. William Becker', with a long horizontal stroke extending to the right.

S. William Becker