



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230  
410-537-3000 • 1-800-633-6101

Martin O'Malley  
Governor

Anthony G. Brown  
Lieutenant Governor

Shari T. Wilson  
Secretary

Robert M. Summers, Ph.D.  
Deputy Secretary

APR 28 2007

The Honorable Stephen L. Johnson  
Administrator, U.S. EPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 1101A  
Washington, DC 20460

RE: Regulations to Control Greenhouse Gas Emissions from Motor Vehicles; Request for Waiver of Preemption Under Clean Air Act Section 209(b), DOCKET ID EPA-HQ-OAR-2006-0173

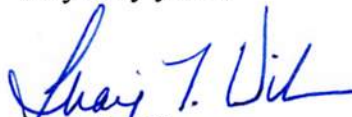
Dear Administrator Johnson:

I am writing to strongly support California's continued and now unreasonably delayed request for a waiver under Clean Air Act section 209(b) (42 U.S.C. § 7543(b)) for California's greenhouse gas emission standards for new cars and light trucks.

As you may know, Maryland is one of many states that have exercised their option under Clean Air Act Section 177 to adopt California's motor vehicle greenhouse gas emission standards as their own. This is because Maryland has a vital interest in reducing global warming emissions from vehicular and other sources in our state. The need for action is no longer in dispute, as again confirmed recently by the world's scientists. See Summary for Policy for Policymakers, IPCC WGI Fourth Assessment Report, available at <http://www.ipcc.ch/SPM2feb07.pdf>.

California's December 21, 2005 waiver submittal provided a solid demonstration that its greenhouse gas emission standards meet relevant waiver criteria. See [http://www.arb.ca.gov/cc/docs/att2\\_support.pdf](http://www.arb.ca.gov/cc/docs/att2_support.pdf). The recent *Massachusetts v. EPA* (2007) \_\_\_ U.S. \_\_\_ [127 S.Ct. 1438, 75 U.S.L.W. 4149] decision only strengthens that demonstration. California has submitted a schedule under which U.S. EPA – which has not even noticed a hearing in the 16 months since the request – can and should grant the waiver within 180 days. Maryland therefore supports the California's recent letter noticing its intent to file an unreasonable delay suit if U.S. EPA fails to take final agency action during that time period. Please enter this letter in the subject docket.

Very truly yours,

  
Shari T. Wilson  
Secretary

cc: David Dickinson, EPA Office of Transportation and Air Quality