



**LRAPA**  
Lane Regional Air Protection Agency

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March 21, 2017

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento CA 95814

Re: Advanced Clean Cars Mid-Term Review

Dear Chair Nichols and Board Members:

My name is Merlyn Hough, and I am the Director of the Lane Regional Air Protection Agency (LRAPA) in Lane County, Oregon. LRAPA is a regional air authority formed in 1968 under Oregon statutes.

These are exciting times! I am grateful to you all for the excellent work you have done in recent decades to significantly reduce vehicle emissions and increase fuel efficiency. Transportation, including light-duty vehicles, is a significant contributor to air toxics, ozone precursors and greenhouse gases, and your emission reduction efforts are critical to improving air quality in all of these categories.

I concur strongly with the major conclusions in 2016 by EPA, NHTSA and CARB, in the midterm evaluation of emission standards and fuel economy standards, that the 2022-2025 standards are feasible and appropriate. I am greatly encouraged that an even wider range of technologies is available for manufacturers to meet the Model Years 2022-2025 standards than envisioned in the 2012 rule, and at similar or lower costs than projected.

I support the more detailed comments provided by the National Association of Clean Air Agencies (NACAA) in July 2016 and November 2016; copies of the NACAA comments are attached.

I also agree with the zero-emission-vehicle (ZEV) conclusions of the January 18, 2017, CARB report on California's Advanced Clean Cars Midterm Review. The California ZEV Regulations are not only essential for meeting California's emission reduction goals but also critical to the success of the Multi-State ZEV Action Plan initiated by eight state governors in 2013 to accelerate commercialization of electric vehicles. California has exclusive authority under the Clean Air Act to set its own motor vehicle emission standards, but CAA Section 177 gives other states the right to adopt emission standards identical to California's.

Thank you for this opportunity for input. Please keep up the good work.

Sincerely,

Merlyn L. Hough, Director  
Lane Regional Air Protection Agency  
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Attachments (2)