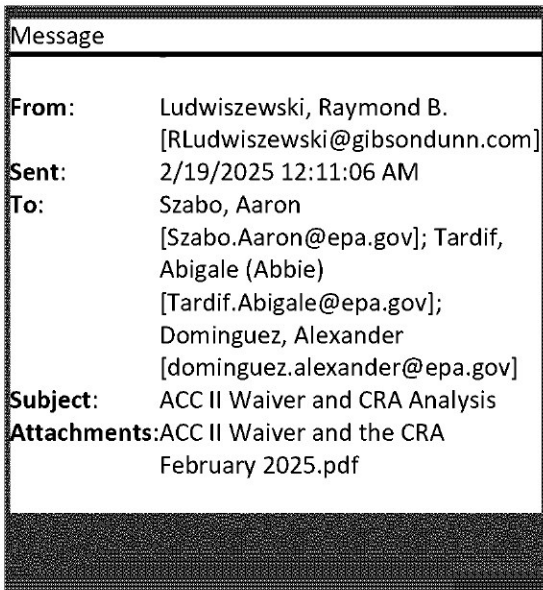




Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Aaron/Abigale/Alexander –

Please find attached an analysis of the legal foundation for subjecting EPA's decision to grant California a waiver for its ACC II program to review under the CRA. I understand that EPA will include documentation supporting the consideration of the waiver as a rule subject to the CRA when it transmits the rules to Congress.

If valuable, I would be happy to discuss further with your counsel at your convenience.

Thx, RAY

Raymond B. Ludwiszewski
Partner

T: +1 202.955.8665 | M: +1 202.262.8294
RLudwiszewski@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
1700 M Street, N.W., Washington, D.C. 20036-4504

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.
