

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

May 31, 2018

Ms. Sarah Carter  
Air Resources Board  
9480 Telstar Avenue, Suite 4  
El Monte, CA 91731


Re: Request for Public Input on Potential Alternatives to a Potential Clarification of the “Deemed to Comply” Provision for the LEV III Greenhouse Gas Emission Regulations for Model Years Affected by Pending Federal Rulemakings

Dear Ms. Carter:

On behalf of the Government of the District of Columbia (District), the Department of Energy & Environment (DOEE) is submitting comments in response to the California Air Resources Board (CARB) request for input on a potential clarification of the “deemed to comply” provision for the LEV III greenhouse gas (GHG) emission regulations for motor vehicles. DOEE encourages CARB to only accept *current* federal GHG emission standards under the “deemed to comply” provision of the LEV III program, and reject any weakened emission standards adopted by the U.S. Environmental Protection Agency (EPA) as non-compliant with California’s emission requirements.

The District has an interest in seeing CARB maintain the stringency of its GHG emission program as an important strategy to enable the District to meet its GHG emission reduction goals. DOEE had previously considered relying on the federal GHG emission standards with the related Corporate Average Fuel Economy (CAFE) standards to achieve a portion of the District’s goal to reduce GHG emissions 50% below 2006 levels by the year 2032<sup>1</sup>. Subsequently, EPA announced its finding that the federal GHG emission standards for vehicle model-year 2022-2025 may be too stringent and need to be revised<sup>2</sup>. In response to EPA’s decision to weaken the federal GHG standards, the District announced plans to adopt California’s vehicle emission requirements in order to maintain the anticipated emission reductions.<sup>3</sup> DOEE therefore supports CARB’s efforts to only accept compliance with the federal standards that achieve equivalent GHG emission reductions to California’s LEV III program.

Sincerely,



Tommy Wells  
Director

<sup>1</sup> Clean Energy DC Draft Plan, 2.2.1.3(1), available at:

[https://doee.dc.gov/sites/default/files/dc/sites/ddoe/publication/attachments/Clean\\_Energy\\_DC\\_2016\\_final\\_print\\_si\\_ngle\\_pages\\_102616\\_print.pdf](https://doee.dc.gov/sites/default/files/dc/sites/ddoe/publication/attachments/Clean_Energy_DC_2016_final_print_si_ngle_pages_102616_print.pdf).

<sup>2</sup> Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles (83 Fed. Reg. 16077, April 13, 2018).

<sup>3</sup> <https://mayor.dc.gov/release/mayor-bowser-signs-order-enabling-district-commit-higher-vehicle-emissions-standards>.