



Oregon

Kate Brown, Governor

Department of Environmental Quality

Agency Headquarters

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

May 31, 2018

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

Dear Ms. Carter:

The Oregon Department of Environmental Quality is pleased to provide comments on your request for input regarding potential alternatives to clarifying the “deemed to comply” provision for the LEV III greenhouse gas (GHG) emission regulations. As one of the eleven states that sign onto your standards and in light of pending EPA action to withdraw the federal GHG emission standards for 2022 through 2025 model year vehicles, we strongly support your intent to clarify these rules and do not believe there is a viable alternative.

The Oregon Legislature in 2007¹ found that “Global warming poses a serious threat to the economic well-being, public health, natural resources and environment of Oregon.” Motor vehicles are Oregon’s largest contributor of greenhouse gas emissions and our continued adoption of the California vehicle standards is a key strategy for us to achieve our state’s commitment on climate change. These rules also provide numerous other environmental, economic and health benefits. It is important that the standards set by California continue to reduce greenhouse gases and other air pollutants from new vehicles and achieve fuel savings for Oregonians through 2025.

The current alignment between state and federal regulations is the result of a negotiated agreement among automakers and state and federal regulators to harmonize the requirements. There are no alternatives to the current standards for achieving this level of reduction. Given the clear potential for the federal standards to be weakened, making clear that those weakened federal standards will not equate to compliance with the California standards for 2022 through 2025 model year vehicles is essential.


EPA’s mid-term evaluation of its standards was a result of a comprehensive analysis and evaluation of technologies on how automakers could reduce greenhouse gas emissions. Its 2017 Final Determination concluded that the standards currently in place for model year (MY) 2022 - 2025 were appropriate and achievable. California’s mid-term review also went through a comprehensive analysis and technology evaluation and similarly concluded that the standards were appropriate and achievable.

¹ ORS 468A.200(2), available at: https://www.oregonlegislature.gov/bills_laws/ors/ors468A.html

Administrator Scott Pruitt's recent announcement that EPA will withdraw the 2017 Final Determination lacks any new information to support such a departure from the 2017 Final Determination. We urge California to remain strong and aggressively defend the current standards.

Oregon is committed to reducing greenhouse gas emissions from motor vehicles and maintaining its adoption of California's LEV III GHG regulation. If you have any questions, please do not hesitate to contact DEQ Air Quality Administrator, Ali Mirzakhali, ali.mirzakhali@state.or.us or Rachel Sakata, Air Quality Planner, sakata.rachel@deq.state.or.us.

Sincerely,



Richard Whitman
Director

Cc: Ali Mirzakhali, Air Quality Administrator
Michael Orman, Air Quality Planning Manager
Rachel Sakata, Air Quality Planner