

# LEV III – GHG Deemed to Comply

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**STEVE DOUGLAS**  
**SENIOR DIRECTOR, ENVIRONMENTAL AFFAIRS**

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# Comments

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- Deemed to Comply
- FFVs – 50F testing on E85
- Harmonization of Criteria Standards

# GHG Requirements

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- Support changes to accept federal compliance as compliance with ARB regulations
- Recommend deleting the state GHG reporting requirements
  - Adds burden
  - Not necessary for compliance
  - Manufacturers will preserve information
- If state GHG reporting maintained, recommend changes noted

# E85 Testing at 50°F

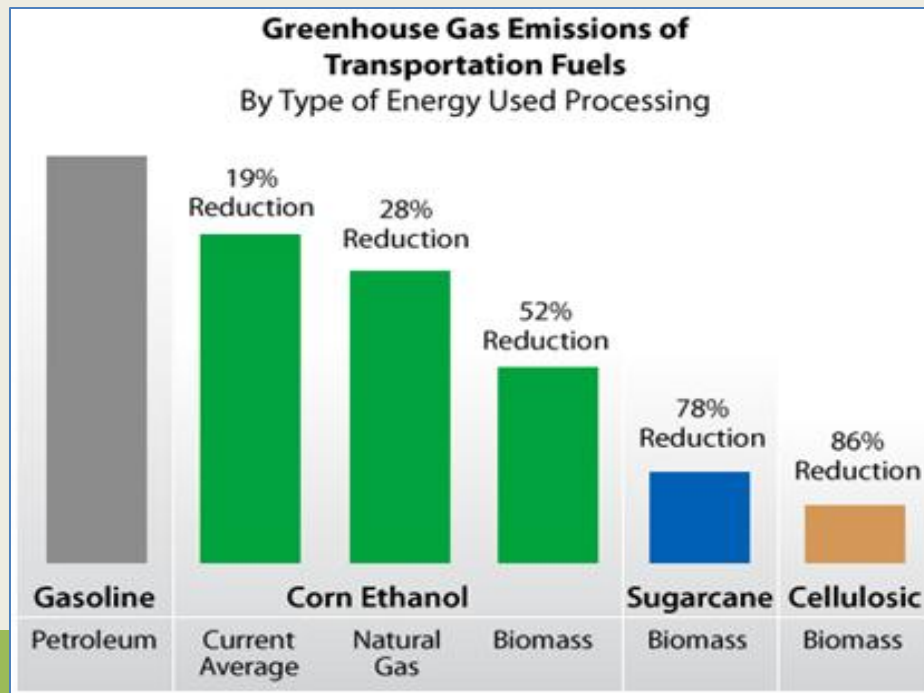
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- FFV tested using
  - E10 at 75°F
  - E10 at 50°F
  - E85 at 75°F
  - **E85 at 50°F**
- E85 / 50°F adds substantial cost
- No federal equivalent
- In future, significant deterrent to FFVs in CA

# E85 Testing at 50°F

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- Unlikely vehicles experience conditions in the test
  - Minimum temps during the summer ozone season above 50°F
  - E85 availability and use (E85 about 0.03% of gasoline in CA)
- FFVs operating on E85 provide real GHG benefit



# E85 Testing at 50°F

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- Work with ARB Staff to review data and develop a recommendation
- Return to the board with a recommendation if changes are warranted

# Criteria Harmonization

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- Criteria emission levels approaching zero (today's vehicles 99.7% cleaner than late 1960s)
- Duplicate requirements at EPA and CA consume manufacturer and agency resources
- Support LEV III and encourage EPA to harmonize with CA in Tier 3
- Additional harmonization will be required by ARB after Tier 3 is finalized



Thank You

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