Oregon

Kate Brown, Governor

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October 26, 2018

U.S. Environmental Protection Agency
EPA Docket Center
Air and Radiation Docket
Mail Code 28221T
Docket ID. No. EPA-HQ-OAR-2018-0283
1200 Pennsylvania Avenue, NW
Washington, DC 20460

U.S. Department of Transportation
National Highway Traffic Safety Administration
Docket Management Facility
M-30
Docket ID No. NHTSA-2018-0067
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

To Whom It May Concern:

The Oregon Department of Environmental Quality is providing the following comments on the U.S. Environmental Protection Agency's (EPA) and National Highway Traffic Safety Administration's (NHTSA) Notice of Proposed Rulemaking (NPRM), the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks.

Oregon DEQ strongly opposes EPA's and NHTSA's proposed SAFE Vehicles Rule. We recommend the EPA and NHTSA withdraw the rule and retain the existing federal standards.

The federal Clean Air Act preempts all states, except for California, from establishing their own motor vehicle emission standards. For over 40 years, EPA has approved California's waiver to establish motor vehicle emission standards that are more stringent than those set by EPA. Section 177 of the Act permits other states to adopt and enforce California's emission standards.

There are 12 other Section 177 states (including the District of Columbia) that have adopted California's GHG emission standards for new motor vehicles. These states and DC comprise one-third of the new car market in the United States. Oregon has been a Section 177 state since 2005, as it recognized the need to reduce greenhouse gases and other air pollutants emitted by vehicles.

Since 2012, the federal government, the State of California, and the major automakers have agreed on a single national program that regulates greenhouse gas and fuel efficiency standards

from all light duty vehicles. This harmonized standard provides regulatory certainty for automakers and lowers costs to consumers for the last six years.

The current EPA and NHTSA proposal to freeze federal light duty vehicle GHG standards for model years 2020 through 2026 creates substantial uncertainty for automakers and would raise costs to consumers.

This is not acceptable to Oregon DEQ for the following reasons:

EPA's decision to weaken the GHG standards is not supported by the record.

EPA's 2017 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. EPA concluded that the standards currently in place for model year (MY) 2022 - 2025 were appropriate and achievable.

This evaluation was informed by a robust stakeholder process and expansive technical record. Nothing has changed since then to warrant a different conclusion.

The mid-term evaluation reached the following key conclusions:

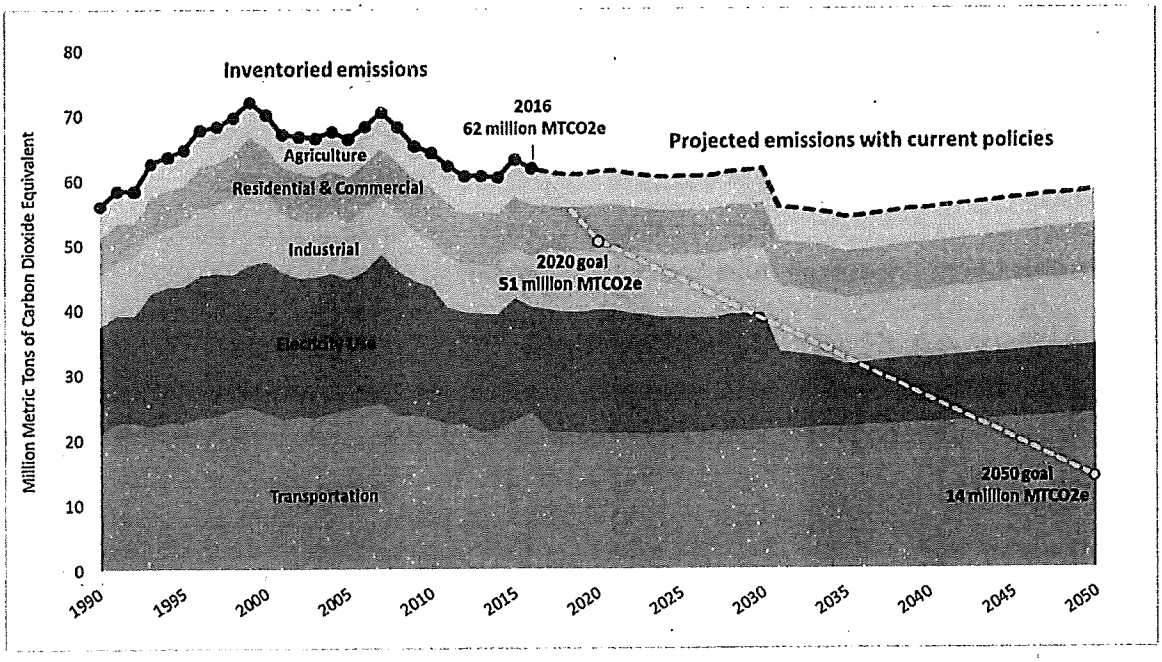
- A wide range of technologies exist for manufacturers to meet the model year 2022-2025 standards;
- Vehicle manufacturers can meet the standards primarily by using advanced gasoline vehicle technologies, and only modest levels of hybrids and low levels of fully electric vehicles are needed; and
- Although consumer choice, the price of fuel, and other factors influence the fleet mix, changes in the fleet mix should not affect the ability of vehicle manufacturers to meet the standards.

EPA's current proposal to weaken the existing GHG standards lacks substantial information to support such a departure from its 2017 evaluation.

Oregon depends on the more stringent standards.

Oregon has an aggressive long-term GHG emission reduction goal: 75% below 1990 levels by 2050 (Figure 1). While emissions from all other sectors are declining, emissions from motor vehicles are climbing. The transportation sector is the single largest source of GHG emissions in Oregon – comprising nearly 40% of statewide emissions.

Figure 1: Oregon's Greenhouse Gas Inventory



To meet our climate goals, we need GHG reductions resulting from low and zero emission vehicles, components of the existing EPA/NHTSA regulations through 2035. The existing regulations would also continue to provide improved fuel economy and overall cost savings to Oregon consumers.

While the existing standards reduce GHG emissions, they also decrease emissions of criteria pollutants and air toxics. This decrease comes as a result of vehicle efficiency and reduced fuel demand. Oregon currently depends on these co-benefits for a number of plans developed throughout the state. Most notably, EPA has approved the use of our Section 177 motor vehicle emission standards as a control strategy in our current State Implementation Plan to meet the National Ambient Air Quality Standards for criteria air pollutants.

To meet our state GHG targets, the Oregon transportation sector must transition to cleaner fuels, reduce the number of miles driven, and convert to cleaner vehicles. In 2017, Governor Kate Brown issued an Executive Order (17-21) establishing a goal of 50,000 registered and operating electric vehicles in Oregon by 2020, and outlining policies designed to achieve that goal. Oregon's programs to reduce transportation sector emissions include:

- A strong vehicle inspection program;
- A clean fuels program that imposes a declining limit on the carbon intensity of transportation fuels and provides incentives to electric vehicle charger owners and electric utilities to support Oregon's transition to electric vehicles;

- A state cash rebate for the purchase or lease of an electric vehicle of between $2,500 and $5,000 per vehicle;
- Leveraging up to 15 percent of the Volkswagen Mitigation Fund to develop and maintain EV charging stations with a focus on connecting rural communities, low-income communities, and Oregonians living in multi-family homes;
- Conversion of the state light duty vehicle fleet to electric and hybrid cars, and the aggressive installation of vehicle charging stations at state facilities; and
- Requirements for Oregon's electric utilities to make investments in transportation electrification to encourage more rapid EV adoption.

In sum, Oregon has invested heavily in decarbonizing the transportation sector. The proposed action by EPA and NHTSA threatens to devalue and undercut these investments, and to place a greater regulatory burden on industry and consumers to meet other state and federal emissions requirements.

Weakening the standards will have adverse effects on the environment and public health.

The overwhelming scientific consensus is that global warming is caused primarily by human activity, and that major reductions in GHG emissions are urgently needed across all sectors in order to avert the worst effects of climate change.

Global warming has had a serious impact in Oregon. We've seen a very rapid increase in the frequency and severity of forest fires that are generating hazardous air quality in many communities for longer and longer periods of time. Smoke from wildfires caused the southern Oregon metropolitan area of Medford to experience 34 days of unhealthy or hazardous levels of air pollution this past year. Last year, Oregon experienced 2,000 wildfires that burned roughly 665,000 acres of forest and rangeland. It cost the state nearly half a billion dollars to suppress these fires. Recent peer-reviewed literature finds that the leading cause of these increases in wildfire is the increase in temperature and change in hydrology caused by climate change. Oregon also is experiencing more frequent and more severe drought, flooding, disease and health impacts, as well as sea level rise, erosion of Oregon's coastline, and damage to ecosystems.

EPA's proposed action is contrary to its stated respect for cooperative federalism

Sections 177 and 209 of the federal Clean Air Act reflects Congress' intent that California and other states be provided the opportunity to set a second set of motor vehicle emission standards unless EPA finds (among other things) that such standards are not needed to meet compelling and extraordinary conditions. Given the evidence of impacts from GHG emissions on wildfire, drought and sea level rise, it is difficult to imagine less compelling and circumstances justifying more protective standards. Oregon strongly supports California's waiver request. The collective effect of these standards in California and the other Section 177 states will make a significant

difference in national and global greenhouse gas emissions and resulting climate effects. The Oregon Department of Environmental Quality strongly objects to the proposed withdrawal of California waivers for its GHG and ZEV standards.

We have adopted state programs to lower the carbon intensity of our transportation fuels, integrate land use and transportation planning to reduce vehicle miles traveled per capita and decarbonize our electricity, but we must continue to have the cleanest and most efficient passenger cars and trucks available in Oregon to avoid emissions that will result in the worst effects of climate change. Weakening requirements for vehicles will place a greater burden on future consumers to address greenhouse gas emissions, and shift the shorter-term burden from automobile manufacturers to fuel suppliers and other sectors of our economy.

We urge EPA and NHTSA to withdraw this ill-advised and flawed proposal, which rolls back years of progress.

If you have any additional questions about these comments, please feel free to contact me or my staff, Rachel Sakata, Air Quality Planner, 503-229-5659, sakata.rachel@deq.state.or.us or Michael Orman, Air Quality Planning Manager, 503-229-6595, orman.michael@deq.state.or.us.

Sincerely,

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Director
Oregon Department of Environmental Quality

cc. Mr. Ali Mirzakhalili, ODEQ Air Quality Administrator
Mr. Michael Orman, Air Quality Planning Manager

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October 31, 2018

U.S. Environmental Protection Agency
EPA Docket Center
Air and Radiation Docket
Mail Code 28221T
Docket ID. No. EPA-HQ-OAR-2018-0355
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To Whom It May Concern:

The Oregon Department of Environmental Quality (ODEQ) is providing the following comments on the U.S. Environmental Protection Agency's (EPA) proposed Emission Guidelines for Greenhouse Gas Emissions From Existing Electric Utility Generating Units; Revisions to Emission Guideline Implementing Regulations; Revisions to New Source Review (NSR) Program, henceforth referenced as the Affordable Clean Energy Proposal (ACE), which was published in the Federal Register on August 31, 2018[1].

Oregon has been working to improve the quality of our air since 1955[2]. The Oregon Department of Environmental Quality's (Oregon DEQ's) air quality permitting program has been State Implementation Plan (SIP)-approved since February 3, 1972[3]. ODEQ has extensive experience evaluating impacts from emission sources within and outside our state and implementing control strategies to meet National Ambient Air Quality Standards. Oregon also has expertise in NSR, having developed and implemented an Oregon specific, SIP-approved, NSR program since 1981[4].

ACE was developed without meaningful consultation with states implementing the federal Clean Air Act (federal CAA), as well as other important partners in protecting our nation's health and environment. As a result, the regulatory changes proposed in ACE are based on an inadequate evaluation of the impacts from these changes. Further, the proposed rule changes will require significant time and resources to implement, with little improvement to Oregon's air quality or meaningful action to mitigate global warming.

[1] 83 Fed. Reg. 44,746
[2] https://www.oregonlegislature.gov/lpro/Publications/AirQuality.pdf
[3] OAR 340-200-0040
[4] OAR 340-224-0010f

EPA did not meaningfully consult with states on ACE prior to issuing the ANPRM (C-52 and C-74):

Oregon is disappointed and concerned with the lack of meaningful consultation it received on the development of the ACE rule. EPA is proposing a number of fundamental shifts, including the proposed NSR changes that will have implications far beyond the proposed changes to the Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units. Changes of this magnitude must have proper consultation with states in order to adequately evaluate the potential impacts. EPA's lack of meaningful consultation with states is plainly evident by EPA's proposal to extend SIP-submittal deadlines from 90 days after promulgation to 3 years after promulgation (C-52). Appropriate consultation would have allowed states to submit plans within the original deadlines of Section 111(d).

The Western Governors Association, of which Oregon is a member, expressed similar concerns and requested EPA to,"...engage in a meaningful and substantive consultation with Governors and their designees on the proposed rule as soon as possible and to take concrete actions to assure that federalism concerns are addressed before the rulemaking proceeds."[5] Oregon reiterates this expectation and calls on EPA to take the appropriate steps to meaningfully consult with states on regulatory actions that would significantly impact their citizens and alter their ability to act as implementing agents of the federal CAA. Oregon strongly recommends EPA review the National Association of Clean Air Agency's comment letter for detailed examples of how EPA can have meaningful consultation with its state partners. (C-74)

The process for review and comment of EPA's ACE proposal is burdensome (C-74):

In EPA's ACE proposal, the agency requests specific comments and prescribes a format for which responses should be organized. This approach will result in a more narrow review of the rule, possibly preventing EPA from receiving constructive comment that would further improve EPA's proposal. Oregon would also note that EPA's formatting of proposed amendments to existing rule language in the ACE proposal is difficult to review and requires extensive expertise in air quality regulations to be able to review and comment. Previous notices from the agency that include amendments to existing rules, such as revisions in the National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry Residual Risk and Technology Review, were presented in a manner that were easier to understand and analyze[6]. Oregon recommends EPA follow past practice for the presentation of amendments to reduce the burden on commenters, especially when EPA did not extended the comment period as Oregon and other states had requested (C-72).

[5] http://www.westgov.org/images/editor/ACE_Letter_FINAL.pdf
[6] 82 Fed. Reg. 44254.

EPA's replacement of the CPP with ACE is not supported by the record:

On December 7, 2009, the EPA found that current and projected concentrations of six key well-mixed greenhouse gasses – carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride – in the atmosphere threaten the public health and welfare of current and future generations[7]. Following this finding, EPA established a best system of emissions reductions for existing electric generating units (EGUs) under Section 111(d) of the Clean CAA, known as the Clean Power Plan (CPP), and emission guidelines for new EGUs under Section 111(b) of the CAA for new sources[8]. The CPP established goals for each state to reduce emissions of greenhouse gases and provided a framework for states to develop plans to meet these goals over a set timeframe.

EPA's emission projections after ACE implementation, on the other hand, show that greenhouse gas and criteria pollutant reductions are much less than they would be under the implementation of the CPP[9]. EPA's nation-wide projections show that repeal of the CPP would increase NOx emissions by 43 thousand short tons in 2035 and SO_2 emissions by 44 thousand short tons. Carbon dioxide emissions would increase 66 thousand short tons in 2035. EPA's analysis shows that ACE implementation would reduce the increases from CPP repeal by at most 33% and in one scenario (NOx in 2035), not at all[10]. Keyes, et al. (August and October 2018), compared the emissions impacts from ACE to those with only a CPP repeal and found that ACE could actually create worse air quality conditions than repealing and not replacing the CPP[11].

EPA also calculated monetized forgone benefits of the ACE proposal, relative to CPP, as ozone and PM2.5 attributable deaths and illnesses[12].EPA's regulatory impact analysis represents the potential increase in premature deaths from this ACE proposal as estimates of "forgone avoided PM2.5 and ozone deaths[13]." The forgone avoided deaths resulting from CPP repeal and ACE implementation are projected as high as 2.4 per 100,000 people in some parts of the country.

As stated previously, Oregon sees the many benefits from the CPP as a means to reduce our impact on global climate change, and as a tool to ensure that our air attains and maintains the NAAQS. The overwhelming scientific consensus is that global warming is primarily caused by human activity, and that major reductions in GHG emissions are urgently needed across all sectors in order to avert the worst effects of climate change.

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[7] 74 Fed. Reg. 66496
[8] 83 Fed. Reg. 44749
[9] Table 6, 83 FR 44784
[10] Ibid.
[11] Keyes, et al., August 2018, Carbon Standards Examined: A comparison of at-the-source and beyond-the-source power plant carbon standards, Working Paper; Keyes, et al., October 15, 2018, Proposed Affordable Clean Energy Rule: Emissions Consequences Fact Sheet. Resources for the Future.
[12] Tables 11 – 14, 83 FR 44787 – 44790.
[13] Tables 4.5 – 4.11, Figure 4.5, Regulatory Impact Analysis for the Proposed Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units; Revisions to Emission Guideline Implementing Regulations; Revisions to New Source Review Program, EPA-452/R-18-006, August 2018.

Global warming has already had a serious impact in Oregon. We've seen increased forest fires, drought, flooding, disease and health impacts, sea level rise, erosion of Oregon's coastline, and damage to ecosystems. Last year, Oregon experienced 2,000 wildfires that burned roughly 665,000 acres of forest and rangeland. It cost the state nearly half a billion dollars to suppress these fires. Smoke from those wildfires has caused the southern Oregon community of Medford to experience 34 days of unhealthy or hazardous levels of air pollution this past year. In addition to the direct cost of fighting these fires, they are burdening local economies in southern Oregon that depend in part on tourism during the summer months[14]

Oregon is strongly opposed to any regulatory changes that would further degrade our air quality and notes that this proposal runs contrary to both Oregon DEQ's mission (to protect the quality of Oregon's air, land and water) and EPA's mission (to ensure that Americans have clean air, land and water). In Oregon, we work to ensure all voices are heard on an important policy issue. Oregon expended significant resources to meet the requirements of the CPP, bringing together numerous stakeholders to find the appropriate balance to meet EPA's goals. We recommend EPA review the record, take stock of its past efforts, and withdraw this proposal.

Proposed changes to the New Source Review Program will have impacts beyond ACE (C-52, and C-59 through C-71):

EPA's ACE proposal includes the incorporation of a new preliminary applicability test for NSR by allowing states the option to adopt an hourly emissions increase test for determining whether a physical or operational change made to an EGU may be a "Major modification" and trigger NSR. Under this approach, only projects that increase a plant's hourly rate of pollutant emissions would undergo a NSR[15].

The NSR program is a vital tool that states like Oregon use to protect the quality of ambient air and the health of our community. EPA notes in the Federal Register notice of the 1996 NSR program revisions,

> "Each SIP is required to contain a preconstruction review program for the construction and modification of any stationary source of air pollution to assure that the NAAQS are achieved and maintained; to protect areas of clean air; to protect AQRV (including visibility) in national parks and other natural areas of special concern; to assure appropriate emission controls are applied; to maximize opportunities for economic development consistent with the preservation of clean air resources; and to ensure that any decision to increase air pollution is made only after full public consideration of all the consequences of such a decision.[16]

EPA's proposed revisions to NSR do not align with the implementing authority of the federal CAA. The changes would allow emission increases at facilities without proper review, limit the ability of

[14] https://www.opb.org/news/article/oregon-wildfire-tourism-revenue-loss/
[15] 83 Fed. Reg. 44778
[16] 61 Fed. Reg. 38252

states without a SIP-approved program to protect air quality, and would bypass public processes and review.

The proposed changes to NSR would apply to not only EGUs that meet proposed applicability of the Heat Rate Improvement (HRI) requirements, but all EGUs that meet the definition of that term contained in 40 CFR 51.124(q)[17]. Oregon does not support this change and recommends that EPA return to its previous NSR rules (C-62). This change is so significant to the NSR program that it must be proposed through separate rulemaking to allow the review it deserves (C-71).

Further, Oregon sees these changes as encouraging a "race to the bottom", with the air quality of certain states being compromised as a result of plant expansions that will not trigger NSR as a result of this proposed change. All aspects of emissions increases must be considered in order to adequately protect against deterioration of an ambient air.

The emissions impacts on airsheds will differ throughout the Nation. Emissions from EGUs and their impacts on ambient air quality are source specific (stack height, temperature, flow rate, meteorology, etc.). NSR allows for an implementing agency to require a full review of air quality impacts to ensure that public health is protected. An hourly emissions increase trigger will limit an implementing authority's ability to address potential deterioration from increased utilization from HRIs. This change does not meet the mission laid out for EPA by Congress and limits states ability to meet air quality goals (C-61 and C-65).

This proposal would allow plants to seek projects that would extend the useful life of their facilities without taking into consideration the impacts those plants are having on air quality. The NSR program was implemented to ensure that air quality improvements were obtained overtime and that plants were not allocated an unlimited right to a given amount of pollution in an air shed (C-57).

As a SIP-Approved program, Oregon will continue to enforce our NSR program to protect public health. Oregon is concerned about the effects these changes will have in states and areas that are not SIP-Approved and how these increases in emissions will impact the air quality of Oregon. The ACE proposal does not adequately demonstrate the impacts this change will have on air quality and therefore should not proceed until EPA appropriately demonstrates the potential impacts from these proposed NSR changes (C-65).

Revisions to Emission Guideline Implementing Regulations (C-51 through C56):

Oregon does not support the proposed changes to the implementing regulations of Section 111(d) of the federal CAA. The proposed extension of plan submittals to 3 years after rule promulgation will further increase the negative impacts from the ACE proposal (C-52). Oregon has been working collaboratively with its affected communities and regulated entities through the CPP process and further delay of improvements is inappropriate and unwarranted. Similarly, Oregon is opposed to an extension of EPA's timeframe to develop a federal plan and to take final

[17] 83 Fed. Reg. 44,798; 40 CFR 51.67(a)

action on a state plan after determining that a state plan is complete (C-54 and C-53, respectively). Further delay in air quality improvements is unacceptable given the amount of planning that has already occurred to meet CPP deadlines.

In addition, Oregon does not support the application of these proposed timing extensions to ongoing emission guidelines by amending their respective regulatory text to incorporate the new timing requirements (C-48). EPA has focused resources to improve its processing of SIP submittals and should be able to process these previously submitted plans within their existing timeframes, just as states were required to submit plans within existing timeframes.

In addition to meeting CPP submittal deadlines, Oregon has taken steps to decarbonize the energy we use. Oregon established a Renewable Portfolio Standard in 2007, and in 2016, the Oregon Legislature strengthened the program to require Oregon's largest utilities provide their customers with at least 50 percent renewable energy by 2040. Additionally, Oregon has established a requirement that Oregon utilities provide their customers with coal-free electricity by 2035. Therefore, Oregon does not foresee the need to submit a plan to EPA for proposed ACE rules (C-55).

EPA's argument for adjusting the definition of emission standard in 40 CFR 60.21 is flawed. The existing implementing regulations of Section 111(d) of the CAA appropriately differentiates an emission standard from an emission guideline. EPA's proposed definition requires consideration of the cost of control in setting a standard of performance. The current implementing regulations allows for states to petition EPA for less stringent emission standards on a case-by-case basis, for reasons such as unreasonable control cost[18]. This change in definition is unnecessary (C-56).

Oregon strongly opposes the inclusion of a provision that would allow for new emission guidelines to supersede the applicability of the implementing regulations. EPA's failure to foresee possible regulatory needs of future emission guidelines is not acceptable justification for creating an unbalanced regulatory floor by allowing for standards, and the monitoring, recordkeeping, and reporting requirements to implement those standards, to be set on a case-by-case basis (C-51).

In the CPP, EPA set a goal for each state to reduce their emissions of greenhouse gasses from the power sector through the CPP. Oregon agencies worked collaboratively with stakeholders to develop our plan to meet these requirements. EPA's ACE proposal acknowledged that the power sector as a whole is shifting towards cleaner, more affordable options for providing power to their customers[19]. Oregonians are willing and able to do our part to reduce the amount of carbon we emit and expect EPA to hold up its end of the bargain.

ACE limits states' ability to set standards (Comment C-24 through Comment C-41)

EPA's ACE proposal limits states' ability to control emissions from the energy utility sector through HRIs alone. This approach limits states' ability to reduce emissions to protect air quality.

[18] 40 CFR 60.24(f)(1)
[19] 83 Fed. Reg. 44750

The CPP appropriately set reduction targets for states to reach over a set timeframe. Oregon provided specific comment on this issue to EPA during the proposed rollback of the CPP[20]. States spent significant resources developing plans in collaboration with our stakeholders. ACE represents a reduction in states authority to develop plans that best meet the needs of our community and is not in the spirit of Cooperative Federalism (C-24 through C-41).

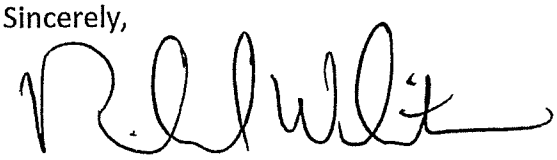
Oregon is investigating options to meet the greenhouse gas reduction goals set for the state. One option is a trading program. Trading and averaging may be a viable alternative for a state to meet goals established by the ACE proposal, but in combination with EPA's proposed NSR revisions, emissions increases at a facility due to trading or offsets may not be required to undergo a review of ambient air quality impacts. EPA must consider these impacts when evaluating trading and averaging options from ACE. Therefore, Oregon again requests EPA abandon its proposed NSR revisions and keep its focus on protecting the Nation's air quality (C-24 through C-41).

Conclusion

EPA's ACE proposal represents a significant negative impact on states' ability to effectively control air quality impacts from some of the largest emission sources. The CPP allowed states to set aggressive targets, and allowed the flexibility needed to meet those goals in a variety of ways. In the CPP, EPA took appropriate steps to consult with states on the impacts of the rule prior to finalizing the proposal and worked with states throughout the process to evaluate and consider impacts. Oregon is opposed to the ACE proposal and urges EPA to withdraw it. Oregon stands ready to take steps necessary to defend our state's rights to protect our public's health and environment.

If you have any additional questions about these comments, please feel free to contact me or my staff, Colin McConnaha, Senior Climate Change Analyst, 503-229-5094, mcconnaha.colin@deq.state.or.us or Michael Orman, Air Quality Planning Manager, 503-229-6595, orman.michael@deq.state.or.us.

Sincerely,



Richard Whitman
Director

Cc:

Ali Mirzakhalili, ODEQ Air Quality Administrator
Kristen Sheeran, Energy and Climate Policy Advisor to Oregon Governor Kate Brown
Paul Garrahan, Oregon Department of Justice

[20] https://www.oregon.gov/deq/FilterDocs/CPPcomment.pdf