

David  
Dickinson/DC/USEPA/US  
06/08/2007 03:47 PM

To "SNODGRASS Emma"  
cc  
bcc

Subject Re: Preemption Waiver Comment Period

thank you - EPA has determined, at this point in time, not to extend the comment period beyond June 15, 2007.

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06/08/2007 03:36 PM

To David Dickinson/DC/USEPA/US@EPA  
cc "NORDBERG Dave" <NORDBERG.Dave@deq.state.or.us>  
Subject Preemption Waiver Comment Period

Mr. Dickinson,  
Please see the attached letter from Andrew Ginsburg regarding the Preemption Waiver  
Comment Period



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EPA-2404



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

### Headquarters

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June 8, 2007

David Dickinson  
Compliance and Innovative Strategies Division (6405J)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: Preemption Waiver Comment Period

Dear Mr. Dickinson:

Oregon Department of Environmental Quality has learned the Alliance of Automobile Manufacturers (AAM) has asked the Environmental Protection Agency (EPA) for a 30 day extension of the comment period for a preemption waiver requested by California. This waiver request applies to California's motor vehicle emission standards for greenhouse gases and was submitted as authorized by section 209 of the Clean Air Act. We further understand AAM seeks an additional 45 day period after the close of comments for EPA to provide formal response.

Oregon urges EPA to reject AAM's petition as an unnecessary and disruptive delay in the processing of California's emission standards. Those greenhouse gas requirements were mandated by California law in 2002 and have since been carefully developed and refined through California's extensive rulemaking process. The greenhouse gas standards have been closely scrutinized and adopted by Oregon and ten other states as being beneficial to human health and welfare. An extension is not needed because industry stakeholders have had since December 2005 to comment on the preemption waiver request and EPA has had that same time to review and consider the request.

Oregon therefore opposes any extension of the preemption waiver comment period or other procedural delays which could jeopardize the smooth implementation of motor vehicle emission standards in California, Oregon and other opt-in states.

Sincerely,

Andrew Ginsburg  
Administrator,  
Air Quality Division

