

June 13, 2019

**VIA ELECTRONIC SUBMISSION**

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**Attn: Docket No. NHTSA-2017-0069**  
**Docket No. NHTSA-2018-0067**  
**Docket No. EPA-HQ-OAR-2018-0283**

**RE: Supplemental Comment of the Union of Concerned Scientists and Public Citizen, Inc. on Environmental Protection Agency's and National Highway Traffic Safety Administration's Proposed Rule, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks, 83 Fed. Reg. 42,986 (Aug. 24, 2018)**

Commenters respectfully submit this supplemental comment on the Environmental Protection Agency's (EPA) and National Highway Traffic Safety Administration's (NHTSA) Proposed Rule, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks, 83 Fed. Reg. 42,986 (Aug. 24, 2018) (Proposed Rule). Because this comment contains material "of central relevance to the rulemaking," we are submitting it in EPA's rulemaking docket for the Proposed Rule.<sup>1</sup> We are also submitting it in NHTSA's dockets for the Proposed Rule and the associated Draft Environmental Impact Statement.<sup>2</sup>

This comment addresses mobile carbon capture (MCC) technologies. As we detailed in our previous comments on the Proposed Rule,<sup>3</sup> MCC is one example of a technology type that could

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<sup>1</sup> 42 U.S.C. § 7607(d)(4)(B)(i); *see also id.* § 7607(d)(7)(A) (providing that such material forms part of the administrative record for judicial review); Proposed Rule, 83 Fed. Reg. 42,986, 43,471 (Aug. 24, 2018) (committing to consider late comments "[t]o the extent practicable").

<sup>2</sup> 5 U.S.C. § 553(c); 49 C.F.R. § 553.23 ("Late filed comments will be considered to the extent practicable."); *see also* Proposed Rule, 83 Fed. Reg. 42,986, 43,471 (Aug. 24, 2018) (committing to consider late comments "[t]o the extent practicable").

<sup>3</sup> See Comments of Center for Biological Diversity, Conservation Law Foundation, Earthjustice, Environmental Defense Fund, Environmental Law and Policy Center, Natural Resources Defense Council, Public Citizen, Inc., Sierra Club, Union of Concerned Scientists on the Proposed Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule

reduce greenhouse gas emissions from vehicles but would not enhance fuel economy—further highlighting the critical distinctions between the statutory mandates of EPA versus NHTSA. A recent Reuters article, dated March 6, 2019, notes that Saudi Aramco, the Saudi Arabian state oil company, is developing MCC technologies, “which could be built into next generation passenger cars for around \$1,400 per vehicle, and help to cut carbon dioxide emissions.”<sup>4</sup>

Saudi Aramco has already successfully demonstrated MCC technology in a Ford F-250 pickup truck (showing 10% CO<sub>2</sub> capture) and a midsize Toyota Camry passenger vehicle (showing 25% CO<sub>2</sub> capture).<sup>5</sup> In 2019, it is aiming to demonstrate 50% CO<sub>2</sub> avoidance in a Volvo heavy-duty truck.<sup>6</sup>

The advances in MCC technology underscore the ephemeral nature of any technological overlap between fuel economy enhancements and greenhouse gas emission abatement from vehicles upon which the Proposed Rule’s preemption arguments rest.<sup>7</sup>

Please contact Dave Cooke, at [dcooke@ucsusa.org](mailto:dcooke@ucsusa.org) or 202-331-6948, if you have any questions regarding this comment.

Respectfully submitted,

**THE UNION OF CONCERNED SCIENTISTS  
PUBLIC CITIZEN, INC.**

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for Model Years 2021-2026 Passenger Cars and Light Trucks, Docket ID Nos. NHTSA-2018-0067-12000, EPA-HQ-OAR-2018-0283-5070 (Oct. 26, 2018) (hereinafter “NGO Comments”) at 166 (Appendix A).

<sup>4</sup> Edward Taylor, *Saudi Aramco Seeks to Overhaul Engines, Fuel Amid EV Hype*, Reuters (Mar. 6, 2019), <https://www.reuters.com/article/us-autoshow-geneva-aramco/saudi-aramco-seeks-to-overhaul-engines-fuel-amid-ev-hype-idUSKCN1QN2CG>.

<sup>5</sup> *Transport Technologies*, Saudi Aramco, <https://www.saudiaramco.com/en/creating-value/technology-development/transport-technologies> (last visited May 30, 2019).

<sup>6</sup> *Id.*

<sup>7</sup> NGO Comments at 166.