

August 27, 2019

VIA ELECTRONIC SUBMISSION

Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Andrew R. Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

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

Re: Supplemental Comment of Blue Green Alliance on the 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. 42986 (Aug. 26, 2018)

Blue Green Alliance respectfully submits this supplemental comment and attachment on the Environmental Protection Agency's ("EPA") and the 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. 42986 (Aug. 24, 2018) ("Proposed Rule" or "Proposal"). The supplemental comment and attachment¹ must be considered as part of this on-going rulemaking as they contain material that is "of central relevance to the rulemaking."²

The attached report, released by the BlueGreen Alliance on August 1, 2019, shows the administration's proposal to greatly weaken augural/existing fuel economy and greenhouse gas standards would dramatically slow adoption of advanced technologies in almost every vehicle

¹ A Department of Transportation regulation issued in 1977 established a 15-page limit for public comments and petitions submitted to the agency. 49 C.F.R. § 553.21; *see also* 42 Fed. Reg. 58,949 (Nov. 14, 1977). The validity of that regulation has never been adjudicated. In an abundance of caution, we are including our report as an attachment to this public comment. *See, e.g.*, EPA & NHTSA, Proposed Rulemaking To Establish Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, 74 Fed. Reg. 49,454, 49,455 (Sept. 28, 2009) ("[Y]ou may attach necessary additional documents to your comments. There is no limit on the length of the attachments.").

² 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) (citing 49 C.F.R. § 553.23 (committing that "[l]ate filed comments will be considered to the extent practicable"))).

subsystem, and cut demand for products made by hundreds of manufacturers and hundreds of thousands of workers all across the country. In addition to any immediate impacts on American jobs and manufacturing, our analysis finds between 89,000 and 202,000 of tomorrow's jobs could be lost or foregone as a result of the proposed rollback of existing Clean Car Standards.

As detailed in the attached report, our analysis reinforces repeated studies that show that direct negative impacts on investment and jobs would result from significantly weakened fuel economy and greenhouse gas standards. Sustaining demand, investment, and job growth in the automotive sector—and by extension across manufacturing in the United States—requires globally competitive, strong, long-term fuel economy and GHG standards. We urge the federal agencies to come back to the table with California and other stakeholders to agree on standards that meet this test.

Please contact Zoe Lipman, zoel@bluegreenalliance.org and 202-706-6902, if you have any questions regarding this comment.

Respectfully submitted,

Zoe Lipman