

November 26, 2019

Christopher Lieske
U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
EPA West Room B102
1301 Constitution Avenue NW
Washington, DC 20460

James Tamm
National Highway Traffic Safety Administration
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

Attention: NHTSA Docket ID No. NHTSA-2018-0067
NHTSA Docket ID No. NHTSA-2017-0069
U.S. EPA Docket ID No. EPA-HQ-OAR-2018-0283

Re: Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years
2021-2026 Passenger Cars and Light Trucks

Dear Mr. Lieske and Mr. Tamm:

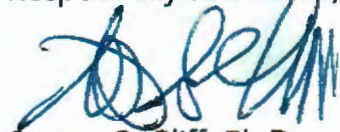
The California Air Resources Board respectfully submits the following supplemental comments and attachments on the United States Environmental Protection Agency's (U.S. EPA) and the National Highway Traffic Safety Administration's (NHTSA) (collectively, the Agencies) Proposed Rule: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks, 83 Fed. Reg. 42986 (Aug. 21, 2018) ("Proposed Rule"). These comments and attached materials contain material that was not available during the public comment period and is "of central relevance to the rulemaking" (42 U.S.C. § 7607(d)(4)(B)(i)). The Agencies must therefore consider this information as part of this ongoing rulemaking.

Innovation to reduce vehicle emissions and improve fuel economy has continued since the comment period on the Proposed Rule closed in October 2018. New technologies' costs have declined, and automakers have committed to bringing them to market. For example, this supplemental comment attaches two presentations from

the United States Department of Energy (U.S. DoE) which, among other information, note that battery prices have declined to \$197/kWh in 2018.¹ Consistent with other sources already in the record, the presentations project battery prices to decline to under \$100/kWh by the early- to mid-2020s. One of these presentations was part of U.S. EPA's State and Local Energy and Environment Webinar Series. In their analysis of the cost of complying with the proposed standards compared to the existing standards, the Agencies relied on a U.S. DoE model to estimate battery costs, so U.S. DoE battery cost estimates are of especially central relevance to the rulemaking.²

The rapid technological progress toward reduced vehicle emissions and improved fuel economy confirms that the Agencies' plans to roll back the current Clean Car Standards are misguided, harmful, and contrary to the broader trajectory toward reduced emissions, improved fuel economy, job growth, consumer savings, and better vehicle offerings for consumers. The Agencies must therefore withdraw the Proposed Rule.

Respectfully submitted,



Steven S. Cliff, Ph.D
Deputy Executive Officer

¹ U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy, USA Hybrid and Electric Vehicles – Market and R&D Activity (Sept. 17, 2019), at 16; U.S. EPA's State and Local Energy and Environment Webinar Series, Electric Vehicle Trends and Projections (Oct. 24, 2019), at 18.

² Preliminary Regulatory Impact Analysis, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Year 2021 – 2026 Passenger Cars and Light Trucks (Oct. 16, 2018), at 186.