



September 14, 2022

Submitted via www.regulations.gov

Vinay Nagabhushana
Fuel Economy Division
National Highway Traffic Safety Administration
Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket ID No. NHTSA-2022-0075 – Notice of Intent to Prepare an Environmental Impact Statement for Model Years 2027 and Beyond Corporate Average Fuel Economy Standards and Model Years 2029 and Beyond Heavy-Duty Pickup Trucks and Vans Vehicle Fuel Efficiency Improvement Program Standards (87 FR 50386)

Dear Vinay –

The Aluminum Association appreciates the opportunity to provide comment on the National Highway Traffic Safety Administration’s (NHTSA) recent ***Notice of Intent to Prepare an Environmental Impact Statement for Model Years 2027 and Beyond Corporate Average Fuel Economy Standards and Model Years 2029 and Beyond Heavy-Duty Pickup Trucks and Vans Vehicle Fuel Efficiency Improvement Program Standards*** as noticed at 87 FR 50386 on August 16, 2022.

The Aluminum Association (the “Association”), based in Arlington, VA, represents U.S. suppliers of primary aluminum, aluminum recyclers, and producers of fabricated aluminum products, as well as industry related businesses. The U.S. aluminum industry directly employed 166,000 workers and indirectly supported an additional 490,000 workers. The industry’s economic output directly generates \$70 billion and indirectly generates an additional \$102 billion in economic output. In total, the U.S. aluminum industry supports more than 634,000 direct, indirect and induced jobs and more than \$176 billion in economic output. Since 2013, aluminum companies in the US have committed or invested more than \$7 billion in new plants

and expansions of existing plants, creating thousands of new, permanent high-paying jobs that drive investments and strengthen the American manufacturing job base and the U.S. economy. Much of this growth has been to support aluminum in automotive market applications and if automotive materials market conditions remain favorable, the aluminum industry will invest even more in domestic jobs and related facilities. Aluminum has realized over 55 years of continuous growth in the North American automotive market, and independent research has confirmed that the trend is expected to continue. Automakers are increasingly turning to aluminum as a material of choice - not only for its contribution to reduced emissions, fuel economy and crash absorption advantages - but also because consumers see its benefits in areas of handling, braking, acceleration, and corrosion resistance.

Within the Association, the Aluminum Transportation Group (ATG) focuses on aluminum use in transportation applications. The group has a long history of data-driven technical interaction with automakers to provide safe and cost-effective lightweighting solutions that assist their compliance with NHTSA's Corporate Average Fuel Economy standards and the Environmental Protection Agency's (EPA) greenhouse gas (GHG) emission reduction. The ATG has also consistently engaged with U.S. DOT's NHTSA, the U.S. EPA, and the California Air Resources Board (CARB) in the evaluation of vehicle mass reduction solutions as an integral component of these agencies' ongoing regulatory efforts to improve fuel economy performance and related GHG emissions reductions. As such, NHTSA's request for comment on the current Notice of Intent is of interest to the ATG specifically, and to the Association more generally.

Broadly, the Association supports the continued prioritization of automobile and light truck CAFE improvements for Model Years 2027 and beyond as well as for Heavy-Duty and Van Vehicle Fuel Efficiency improvements for Model Years 2029 and beyond. The Association believes that continuing to increase the efficiency of mobility solutions consistent with the 'maximum feasible' criteria will strengthen the United States' competitive advantage in the evolving global vehicle marketplace, provide vehicles that customers want, and contribute to improved environmental outcomes. Specifically, as regards the Notice of Intent, the Association has the following comments:

87 FR 50390 – “NHTSA seeks comment on the attribute used to set CAFE and FE standards” –

The continued use of footprint-based standards as the attribute to set GHG gram/mile emission targets for separate car and light truck vehicle classes is wholly appropriate, as these standards have proven to be a valuable means of incentivizing automakers to focus on fuel-efficiency and emissions improvement across all vehicle classes through greater use of lighter, yet stronger materials. As larger vehicles comprise an ever-growing portion of US light duty vehicle sales, the footprint-based approach provides an incentive for reducing weight in such vehicles, where weight reduction is the most beneficial in terms of fuel economy improvements and fleetwide safety.

87 FR 50391 – “NHTSA is considering examining life cycle impacts consistent with its past EISs and looking at tools that may be available for quantitative analysis” –

By collecting, aggregating and publishing up-to-date life cycle inventory data for aluminum production and aluminum product manufacturing, the aluminum industry and the Aluminum Association have been supporting full life cycle environmental assessment initiatives and programs during the past three decades. For the transportation market, the Aluminum Association has provided its support through data provision and regular updating for the GREET Model, developed and maintained by the Argonne National Lab and widely used by the automotive industry to assess the life cycle environmental impacts of vehicles. The latest aluminum life cycle inventory data was published in February 2022. Included in the data were automotive sheet, automotive extrusion, and die casting datasets specifically developed for the automotive market. Work is ongoing with the Argonne National Lab to update these datasets to make sure that OEMs and other users are able to use the latest data and information to accurately assess the potential environmental impacts of aluminum auto products throughout the entire life cycle of vehicles. As the most significant lightweight automotive material, aluminum offers great benefits to significantly reduce the overall energy consumptions of vehicles through fuel consumption reduction and through extending the driven range of electric vehicles. As EPA continues to expand its work in this area, the aluminum industry looks forward to providing data and information to reflect the latest progress made by the industry and make

sure that such data and information can be accurately used by stakeholders with easy access and wider availability.

Again, the Aluminum Association appreciates the opportunity to provide these comments to NHTSA as it prepares its draft Environmental Impact Study. If you have any questions or would like to discuss any of these issues in greater detail, please do not hesitate to contact me at 703-358-2976, 804-385-6351 or cwells@aluminum.org.

Sincerely,

A handwritten signature in black ink that reads "Curt Wells". The signature is written in a cursive, slightly slanted style.

Curt Wells
Senior Director of Regulatory Affairs and Corporate Stewardship
The Aluminum Association