

August 1, 2016

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Submitted *electronically* to [www.regulations.gov](http://www.regulations.gov) & [2016TAR@arb.ca.gov](mailto:2016TAR@arb.ca.gov).

Docket ID No. EPA-HQ-OAR-2015-0827  
Docket ID No. NHTSA-2016-0068  
CARB - <http://www.arb.ca.gov/msprog/levprog/leviii/2016tar.htm>

RE: Request for Extension of Deadline to Comment on Draft Technical Assessment Report: Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy for Model Years 2022-2025

Dear Mr. Lieske, Ms. Yoon and Mr. McCarthy:

The below-listed signatory organizations (hereinafter, “Organizations”) request an extension of the comment period for the Draft Joint Technical Assessment Report on the Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for Model Years 2022-2025 (“Draft TAR”).<sup>1</sup> The Organizations respectfully request an extension of the comment period from the current 60 days to a total of not less than 120 days.

Many of the Organizations have been working with the U.S. Environmental Protection Agency (“EPA”) and the National Highway Traffic Safety Administration (“NHTSA”) (“the Agencies”) to provide meaningful information and comment on many aspects related to the Draft TAR and

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<sup>1</sup> Notice of Availability published at 81 Fed. Reg. 49217 (July 27, 2016).

plan to continue doing so. However, the Draft TAR provides the first opportunity for our members to understand whether and how the Agencies have utilized and interpreted this information in its assessments. The Draft TAR spans more than 1,200 pages and incorporates the findings of 1,099 separate references.

Even now, some supporting documents and analyses are not fully available for review. For example, during an in person search by Alliance staff on July 26, 2016, EPA reading room librarians stated that articles from “Docket EPA-OAR-2015-0827” will not be published for at least a month. Furthermore, many supporting documents were not available in the electronic docket through the regulations.gov website until July 27, 2016, and certain referenced documents (e.g. “ALPHA Autonomie Comparison.pdf,” referenced as docket location EPA-HQ-OAR-2015-0827-0939) still appear to be missing.

In addition to an extension of the formal comment period, every stakeholder would benefit if the Agencies would explain their anticipated schedule in more detail for the Midterm Evaluation following the release of the Draft TAR. The Organizations recognize that in the 2012 Rule, EPA declined to commit to a specific schedule beyond issuing the Draft TAR, a Preliminary Determination and a Final Determination or decision (*See* 77 Fed. Reg. at 62787). However, it now is critical to the success of the Midterm Evaluation process that the Agencies explain their intentions regarding:

1. whether they intend to issue a revised or final TAR, addressing public comments;
2. when they expect to issue the Proposed Determination of Notice of Proposed Rulemaking; and
3. the specific timing for the joint final rule if EPA determines the MY 2022-2025 standards should change.

Finally, the Organizations note that California’s Air Resources Board (“CARB”) is pursuing its own midterm evaluation on an accelerated schedule.<sup>2</sup> For example, CARB is hosting a technology symposium on September 28-29, 2016, which falls outside of the current comment period for the Draft TAR. Comments and testimony provided at this symposium should be included in the public docket for the Draft TAR. The Organizations remain concerned that the current approach is inconsistent with the agreed-upon commitment to develop “One National Program.” EPA and NHTSA should seek to be more transparent and forthcoming about their coordination efforts with CARB, and should ensure the midterm evaluations performed by the Agencies and CARB are aligned, particularly in regards to both the substance and timing of the actions.

Thank you for your prompt consideration of this extension request and questions regarding the Agencies’ overall schedule.

If you have any questions regarding this request, please contact Chris Nevers (Alliance of Automobile Manufacturers) [cnevers@autoalliance.org](mailto:cnevers@autoalliance.org) at 248-357-4717 or Julia Rege (Association of Global Automakers) [jrege@globalautoamkers.org](mailto:jrege@globalautoamkers.org) at 202-650-5559.

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<sup>2</sup> See [http://www.arb.ca.gov/msprog/consumer\\_info/advanced\\_clean\\_cars/consumer\\_acc\\_mtr.htm](http://www.arb.ca.gov/msprog/consumer_info/advanced_clean_cars/consumer_acc_mtr.htm), describing how the results of CARB’s midterm review will be presented in December 2016.

Alliance of Automobile Manufacturers  
American Automotive Policy Council  
American International Automobile Dealers  
American Iron and Steel Institute  
American Highway Users Alliance  
Association of Global Automakers, Inc.  
Growth Energy  
Motor & Equipment Manufacturers Association  
National Association of Manufacturers  
National Automobile Dealers Association  
National Corn Growers Association  
Renewable Fuels Association  
Rubber Manufacturers Association  
Specialty Equipment Manufacturers Association  
U.S. Chamber of Commerce  
U.S. Coalition for Advanced Diesel Cars

cc: Bill Charmley, EPA  
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Kevin Green, DOT  
Ryan Harrington, DOT  
James Tamm, NHTSA  
Annette Hebert, CARB