

September 5, 2018

Acting Administrator Andrew Wheeler
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, D.C. 20460
Via regulations.gov: Docket ID No. EPA-HQ-OAR-2018-0283



Re: Request for 120-day Comment period on Proposed rule “The Safer and Affordable Fuel Efficient Vehicles Proposed Rule for Model Years 2021-2026”

CC: Bill Wehrum, Assistant Administrator, Office of Air and Radiation



Dear Acting Administrator Wheeler:

On behalf of the undersigned associations, representing state and local decisionmakers, we respectfully request that EPA extend to 120 days the public comment period for the proposed rule, “The Safer and Affordable Fuel-Efficient Vehicles Proposed Rule for Model Years 2021-2026,” (docket EPA-HQ-OAR-2018-0283, August 7, 2018; 83 FR 42986, August 24, 2018).



The rule in question is profoundly impactful to the state and local agencies charged with implementing the Clean Air Act. Cooperative federalism relies on federal, state and local governments interacting cooperatively and collectively to solve common problems, and Title II of the Clean Air Act is built upon a central role for state and local governments.



Sixty days is insufficient to give this proposal the meaningful review and analysis it requires. The rule itself, coupled with its Regulatory Impact Analysis and Environmental Impact Statement, comprises over 3,000 pages of deeply technical content. Agencies and decisionmakers in each of the 50 states and D.C., as well as the 116 local clean-air agencies, must have time to do a thorough technical review and coordinate internally and externally to assure that their comments are sufficiently informed to provide meaningful analysis and input.



As such, we jointly request that the public comment period should be extended by (at least) 60 days from the current date of October 23, 2018, to December 22, 2018,

to provide a full 120-day comment period. A 120-day comment period would offer state and local leaders and experts a more reasonable opportunity to comment at the level of depth that is consistent with cooperative federalism.

Thank you for considering this extension request. If you have further questions, please do not hesitate to contact Miles Keogh (mkeogh@4cleanair.org, 202-624-7864) or any of the undersigned points of contact.

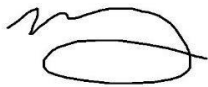
Sincerely,



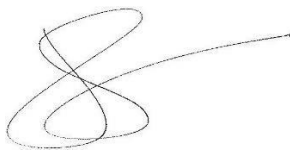
Scott D. Pattison, CEO and Executive Director, National Governors Association



Sam Sankar, Executive Director Environmental, Council of the States



Miles Keogh, Executive Director, National Association of Clean Air Agencies



Jason E. Sloan, Executive Director, Association of Air Pollution Control Agencies



David Terry, Executive Director, National Association of State Energy Officials