



May 5, 2023

Mr. William Charmley Director, Assessment and Standards Division U.S. Environmental Protection Agency Office of Transportation and Air Quality 2000 Traverwood Dr. Ann Arbor, MI 48105

Via email: charmley.willam@epa.gov

Re: Request for Extension of Comment Period on EPA's Proposed Rulemakings: "Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3" (EPA-HQ-OAR-2022-0895) and "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles" (EPA-HQ-OAR-2022-0829)

The American Petroleum Institute (API) is a national trade association representing all sectors of the U.S. oil and natural gas industry, with nearly 600 members, throughout exploration, refining, pipelines, distribution, and retail. The American Fuel & Petrochemical Manufacturers (AFPM) is a national trade association whose members own and operate most of the United States' refining and petrochemical manufacturing capacity. API and AFPM members have committed to delivering solutions that improve air quality and help to reduce the risks of climate change while meeting society's growing energy needs. We support global action that drives greenhouse gas (GHG) emissions reductions and economic development.

API and AFPM are substantially affected by EPA's proposed vehicle standards, and we therefore plan to comment on EPA's proposed rulemakings "Greenhouse Gas Emissions Standards for Heavy-Duty Engines and Vehicles-Phase 3" and "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles". If finalized as proposed, the proposals would have a very significant impact on all segments of the fuels and vehicle industries and the entire U.S. economy. To adequately address each proposal, we request that EPA grant an additional 90 days for public comment for <u>each</u> proposal. For rules of this scope and complexity, 50 and 60 days for each proposal running concurrently are insufficient. API and AFPM respectfully assert that a 50-day and a 60-day comment period violate EPA's obligation to provide public notice and an opportunity to comment – on proposals that seek to reverse the balance between gasoline/diesel-fueled engines (about 99% of vehicles today) to electric vehicles (about 1% of today's vehicles).

Each proposal merits 90 additional days to comment because, as EPA notes, the agency is proposing the "most stringent vehicle standards" ever. EPA has asked for comments on many complex science and policy issues that stakeholders must review and analyze. Commenters must assess the wide range of issues related to the proposed mandatory shift to BEVs and review EPA's data or analyses. Collectively, the proposals comprise nearly 1,400 pages of rulemaking text, and over 1,000 items of supporting

materials in the rulemaking docket. In addition, EPA is also proposing two programs at once that, for many stakeholders, will both have a significant impact and will thus both require time and attention.

To ensure an adequate and complete record for EPA's proposed standards and to allow commenters a fair opportunity to review and analyze EPA's proposals, given the high level of EPA regulatory activities that impact API and AFPM members and many other stakeholders throughout the transportation sector, we respectfully request that EPA extend the public comment deadline 90 days for each proposal.

Respectfully submitted,

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