



October 26, 2018

Andrew Wheeler, Acting Administrator
U.S. Environmental Protection Agency
EPA Docket Center
Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Submitted Electronically

ATTN: Docket ID No. EPA-HQ-OAR-2018-0283

Heidi King, Deputy Administrator
National Highway Traffic Safety Administration
Docket Management Facility, M-30
U.S. Department of Transportation
West Building, Ground Floor, Rm. W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

ATTN: Docket ID No. NHTSA-2018-0067

Re: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks; Notice of Proposed Rulemaking, 83 Fed. Reg. 42,986 (Aug. 24, 2018), and Extension of Comment Period, 83 Fed. Reg. 48,578 (Sept. 26, 2018)

Dear Acting Administrator Wheeler and Deputy Administrator King:

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on Docket ID Nos. EPA-HQ-OAR-2018-0283 and NHTSA-2018-0067 regarding the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks. NDFU, the largest general farm organization in North Dakota, represents more than 47,000 farm and ranch families and their energy and agriculture supply cooperatives.

The SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks will set the Corporate Average Fuel Economy (CAFE) and carbon dioxide (CO₂) emission standards for passenger cars and light trucks manufactured for sale in model years 2021-2026. NDFU's member developed policy positions have long supported increases in the Corporate Average Fuel Economy (CAFE) Standards when it develops better fuel economy while maintaining vehicle power and performance. NDFU's member policies also support the research, development, and use of domestic ethanol, biodiesel, and biofuels.



Comments of North Dakota Farmers Union

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The EPA and NHTSA proposed rule requests comments on the benefits of increasing fuel octane levels. NDFU supports the availability and use of high octane, low carbon fuels, like mid-level ethanol blends, because of the economic benefits to family farmers and consumers, reduced air emissions, and increased energy independence. NDFU urges the EPA to support the use of higher octane blends, specifically mid-level ethanol blends, for year round use, starting with the implementation of President Trump's recent directive regarding the E15 waiver.

Family farmers and ranchers are currently facing substantial economic hardships. The EPA's failure to fully implement the Renewable Fuel Standard (RFS) program and the issuance of retroactive small refinery exemptions under the RFS, combined with the proposed rule's less stringent CAFE standards, will decrease ethanol demand and increase the financial strain on family farmers. The support and use of higher ethanol blends through the RFS and increasing CAFE standards can provide a much needed economic boost to family farmers and rural communities as well as allow for the development of better engine technology resulting in improved vehicle performance and fuel economy.

NDFU respectfully requests the EPA and NHTSA support the increased use of high octane, low carbon fuels, specifically mid-level ethanol blends because of their environmental and economic benefits.

Sincerely,

NORTH DAKOTA FARMERS UNION

A handwritten signature in black ink that reads "Mark Watne".

Mark Watne
President