

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL COALITION FOR  
ADVANCED TRANSPORTATION,

Petitioner,

v.

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY,

ANDREW R. WHEELER, in his official  
capacity as Administrator, United States  
Environmental Protection Agency,

UNITED STATES DEPARTMENT OF  
TRANSPORTATION,

ELAINE L. CHAO, in her official capacity  
as Secretary, United States Department of  
Transportation,

NATIONAL HIGHWAY TRAFFIC  
SAFETY ADMINISTRATION,

JAMES C. OWENS, in his official  
capacity as Deputy Administrator,  
National Highway Traffic Safety  
Administration,

Respondents.

No. 20-1174

**PETITION FOR REVIEW**

Pursuant to Rule 15 of the Federal Rules of Appellate Procedure, D.C. Circuit Rule 15, 42 U.S.C. § 7607(b)(1), and 49 U.S.C. § 32909(a)(1), the National

Coalition for Advanced Transportation hereby petitions this Court for review of the final action entitled, “The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks,” issued by respondents United States Environmental Protection Agency and Administrator Andrew Wheeler in his official capacity, United States Department of Transportation and Secretary Elaine L. Chao in her official capacity, National Highway Traffic Safety Administration and Deputy Administrator James C. Owens in his official capacity, and published in the *Federal Register* at 85 Fed. Reg. 24,174 on April 30, 2020. The National Coalition for Advanced Transportation also petitions for review of respondent United States Environmental Protection Agency’s action, entitled “Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022–2025 Light-Duty Vehicles,” published in the *Federal Register* at 83 Fed. Reg. 16,077 on April 13, 2018. *See* 5 U.S.C. § 704 (“A preliminary, procedural, or intermediate agency action or ruling not directly reviewable is subject to review on the review of the final agency action.”).

Dated: May 28, 2020

Respectfully submitted,

/s/ Stacey L. VanBellegem

Stacey L. VanBellegem

Robert A. Wyman

Devin M. O'Connor

Ethan Prall

LATHAM & WATKINS LLP

555 Eleventh Street, NW

Suite 1000

Washington, DC 20004-1304

(202) 637-2200

stacey.vanbellegem@lw.com

*Counsel for Petitioner National Coalition  
for Advanced Transportation*

**CERTIFICATE OF SERVICE**

I, Stacey VanBelleghem, hereby certify that on this 28th day of May, 2020, a true and correct copy of the foregoing Petition for Review was served by certified mail, return receipt requested, on the following:

Hon. Andrew Wheeler, Administrator  
Office of the Administrator (1101A)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Correspondence Control Unit  
Office of General Counsel (2311)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Hon. William Barr  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

Hon. James Owen  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Mr. Jonathan Morrison  
Chief Counsel  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Hon. Elaine L. Chao  
Office of the Secretary  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Office of the General Counsel  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

*/s/ Stacey L. VanBelleghem*

Stacey L. VanBelleghem