

National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy Standards ("CAFE") for Passenger Cars and Light Trucks for Model Years 2022-2031 (SAFE Vehicle Rule III)

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As prepared for delivery

My name is Liz Scott and I'm the Senior Director for Nationwide Clean Air Advocacy at the American Lung Association. I'm speaking today in opposition to the proposed rollback of fuel economy standards, and I urge the administration to withdraw the proposal and instead maintain strong efficiency standards.

The existing standards that this proposal would weaken are projected to significantly reduce pollution and NHTSA projected this dramatic decline was projected to save hundreds of lives. Rolling back the standards, by NHTSA's own admission, would lead to more premature deaths, asthma exacerbations and health emergencies due to air pollution.

Especially at a time where millions are still living in areas with dangerous levels of air pollution (over 156 million Americans according to the Lung Association's "State of the Air" report), ensuring vehicles are operating more efficiently mean they will pollute less, reducing the factors that make the air unhealthy to breathe. This is a clear health imperative for making vehicles more efficient.

But the original and lasting intent of fuel economy standards is to help consumers save money at the gas station. The administration has falsely framed this rollback as saving consumers money when in reality it will actually raise costs for consumers. Fuel economy standards have saved consumers hundreds of dollars every year. Since 2001, due to efficiency improvements that these standards have helped secure, consumers will have saved over \$9,000 over the lifetime of a new vehicle sold in 2024.

The proposed rollback touts an up-front cost savings when purchasing a new vehicle. But the proposal then goes on to admit that consumers are projected to pay at least \$187 more due to higher fuel costs. That number is also likely an underestimation, as NHTSA acknowledges that it cannot determine whether manufacturers would actually pass regulatory cost-savings down to consumers. I note that the proposal also relies on false claims that more efficient vehicles aren't safe. Advances in vehicle design, engineering, and safety technologies have significantly improved vehicle safety over time, while fuel economy has also increased, demonstrating that efficiency and safety improvements can advance together.

As a representative of a health organization, I've focused my comments on consumer costs because it does connect to the overall affordability crisis that Americans are facing, which includes the healthcare crisis. Anything that increases health harms will bring an increase in the need for healthcare. At a time when healthcare premiums have skyrocketed due to the inaction on healthcare tax credits, Americans cannot afford additional stresses on their pocketbook.

I urge NHTSA to withdraw this proposal and maintain the strongest possible efficiency standards for new cars and light trucks.