

Comments of William Barrett  
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**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)**

Good morning, my name is Will Barrett, Assistant Vice President for nationwide clean air policy with the American Lung Association. The American Lung Association calls on NHTSA to withdraw this proposal.

The transportation sector is the leading source of harmful smog-forming emissions and a major source of fine particle pollution, among other health-harming air pollutants. Millions of Americans have benefited from the reduction in deadly pollution because of decades of federal policies that cut harmful emissions, reduce burning of fossil fuels and generally improve the efficiency of on-road vehicles. Sadly, NHTSA’s proposal fits within a pattern of recent federal actions to undermine long-standing health protections.

The proposed rule is a departure from longstanding practice to ensure that vehicles become more efficient over time, that the baseline accurately reflects the realities of the on-road vehicle fleet and, crucially, that the rules are grounded in decades of progress to reduce the harms of driving, both to family budgets and their health.

The proposal sets standards retroactively and goes beyond statutory direction for establishing standards for more than 5 model years. This represents a clear departure from the statute.

NHTSA has proposed rolling efficiency standards so far back that a passenger vehicle sold in 2022 would achieve greater fuel efficiency than one sold five years from now. This is a departure from the statutory direction to set maximum feasible standards.

The proposed fuel economy standards are made possible by mischaracterizing the on-road vehicle fleet – this proposal assumes that there are no zero-emission cars on the road today. The baseline methodology is a clear departure from standing legal interpretation and practice.

As you will hear from my colleagues and other health experts today, the proposal is clear that pollution will increase: hundreds of people will die and thousands will experience asthma attacks and other health emergencies if NHTSA follows through on this proposal.

NHTSA must follow the law, the technology and the basic tenets of serving the driving public’s best interests and must retract this proposal.