



Asthma and Allergy Foundation of America



Children's Environmental Health Network



The Medical Society Consortium
ON CLIMATE & HEALTH



National Association of Pediatric Nurse PractitionersSM



October 16, 2023

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Docket: NHTSA-2023-0022
Model Years 2027 and Beyond Corporate Average Fuel Economy Standards and Model Years 2030 and Beyond Heavy-Duty Pickup Trucks and Vans Fuel Efficiency Improvement Program Standards**

On behalf of the undersigned health and medical organizations, we call on the National Highway Transportation and Safety Administration (NHTSA) to establish the most stringent possible fuel economy standards. Implementing stronger standards is critical to reducing the ongoing health, climate and economic burdens posed by fossil fuel combustion in the nation's vehicle fleet.

Set the Most Stringent Possible Standards to Cut Pollution, Oil Consumption and Consumer Cost

We call on NHTSA to adopt the strongest possible standards to further reduce fossil fuel combustion and support the ongoing transition to zero-emission technologies in vehicles. As proposed, the rules would require fuel economy improvements of 2 percent per year for passenger vehicles and 4 percent for light trucks from 2027-2031, with 10 percent increases in efficiency for the heavy-duty pick-up and van sector between 2030-2035. The proposal calls for a final fuel economy standard equivalent to 58 miles per gallon by 2032 for light-duty vehicles, though notes that the real-world performance can be reduced by 20-30 percent.¹

The typical gap between fuel economy standards required under NHTSA's previous standards and what those vehicles actually achieve on the road is a challenge for consumers and a

¹ National Highway Traffic Safety Administration. Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027-2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030-2035. Summary at p. 1. July 2023. [CAFE-2027-2032-HDPUV-2030-2035-NPRM-web-version.pdf \(nhtsa.gov\)](https://www.nhtsa.gov/sites/nhtsa/files/CAFE-2027-2032-HDPUV-2030-2035-NPRM-web-version.pdf)

problem for public health. Ensuring real-world performance improvements must be central to NHTSA's rulemakings, including both this and future proposals, as well as to related rulemakings from EPA.

NHTSA estimates that the preferred alternative proposal would result in:

- \$50 billion in consumer fuel savings,
- 88 billion gallons of avoided oil consumption, and
- Over 900 million tons of climate-forcing emissions reduced.²

NHTSA has also proposed more stringent standards that would provide greater reductions in harmful pollution, oil consumption and consumer costs. To the extent feasible, we urge NHTSA to capture greater emissions benefits through the strongest possible final standards.

Air Pollution and Climate Change are Harming the Nation's Health

Today, more than one out of every three people in the United States – nearly 120 million people – live in a community impacted by unhealthy levels of air pollution. Climate change impacts including extreme heat, devastating storms and catastrophic wildfires are making the job of cleaning the air more difficult and amplifying public health burdens and disparities. Combustion of fossil fuels in the transportation sector is a leading source of the harmful emissions causing air pollution and climate change impacts, meaning that NHTSA's fuel economy standards have the potential to significantly benefit health, healthy equity and a healthy climate.

NHTSA's More Ambitious Alternatives Carry Additional Benefits

NHTSA's preferred alternative would require approximately 2% per year increases in fuel economy for passenger vehicles and a more robust 10% reduction for heavier duty pick-up trucks and other commercial vehicles up to 14,000 pounds. The alternative standards are also proposed ranging up to 6% annual improvement for passenger vehicles and 14% for heavier vehicles. These more ambitious options would yield greater reductions in fossil fuel consumption, harmful emissions and fuel costs. For example, the preferred light-duty scenario would reduce 367 premature deaths and 13,064 asthma attacks due to reduced vehicle emissions and the more stringent alternatives would increase these benefits nearly three-fold.³ For heavier pickups, the more stringent alternative would more than triple the benefits of the preferred alternative.⁴

NHTSA notes that the estimates of health benefits of the proposal and its alternatives are undercounts. The estimates are based on reductions in emissions of certain criteria pollutants. The health benefits analysis is limited and does not include monetized health harms of ozone, ambient oxides of nitrogen or air toxics.⁵ The vehicle pollutants cause additional health harms to our patients and communities, and the fact that they are more difficult to monetize makes them no less real.

Final Standards Must Account for All State Zero-Emission Vehicle Programs and Inflation Reduction Act

The transition to zero-emission technologies has major public health benefits. The Lung Association's "Zeroing In on Healthy Air" report notes that over \$1 trillion in public health benefits could be achieved by 2050 through a broad transition to zero-emission transportation

² NHTSA Press Release. USDOT Proposes Updated Fuel Economy Standards to Strengthen Energy Security, Save Americans Hundreds of Dollars at the Gas Pump. <https://www.nhtsa.gov/press-releases/usdot-proposal-updated-cape-hdpuv-standards>

³ NHTSA at p. 430.

⁴ NHTSA at p. 438

⁵ NHTSA at p. 315.

coupled with zero-emission electricity.⁶ The report highlights that 100,000 premature deaths, over 2 million asthma attacks and over 11 million lost workdays could be avoided through the transition to zero-emission technologies for on-road transportation and electricity generation.

The final standards should be focused on reducing consumption of fossil fuels to the greatest extent possible and must recognize the baseline growth in new passenger vehicle sales moving increasingly to zero-emission technologies. We appreciate that NHTSA's final rule accounts for previous and ongoing adoption of zero-emission sales standards for cars and light trucks that are subject to CAFE.⁷ We call on NHTSA to update the final rules to capture any additional states that adopt ZEV standards, including Maine, Maryland, New Mexico and Rhode Island. Colorado has already adopted the Advanced Clean Trucks Standard, and Maine, Maryland, New Mexico and Rhode Island are in the process of adopting it, but none of these states were not included in the baseline fleet.

NHTSA's analysis notes that the final rules will account for updated upstream modeling for emissions that will better reflect the growth in renewable energy on the grid, and the potential for incorporation of tools that better reflect Inflation Reduction Act investments. We support this consideration being included in the final emissions analysis of the proposal and more stringent alternatives.

Conclusion

To move the nation's vehicle fleets forward toward greater efficiency, we urge NHTSA to finalize the most stringent possible CAFE standards without delay. To the extent feasible, NHTSA should build upon the preferred alternative in setting a stronger standard that increases societal benefits and reduces harmful emission from the combustion fleet while the nation transitions to zero-emissions. This rulemaking is an important part of the Administration's work to drive this transition to improve public health and health equity, and the agency must not miss this opportunity.

Sincerely,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Lung Association
American Public Health Association
Asthma and Allergy Foundation of America
Children's Environmental Health Network
Climate Psychiatry Alliance
Health Care Without Harm
Medical Society Consortium on Climate and Health
National Association of Pediatric Nurse Practitioners
Physicians for Social Responsibility

⁶ American Lung Association. Zeroing in on Healthy Air. March 2022.

⁷ NHTSA at pp. 128-129.