ENVIRONMENTAL LAW & POLICY CENTER
Protecting the Midwest's Environment and Natural Heritage

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National Highway Traffic Safety Administration
U.S. Department of Transportation

RE: Public Hearing Testimony on Corporate Average Fuel Economy Standards for Model Years 2024–2026 Passenger Cars and Light Trucks, 86 Fed. Reg. 169 (Sept. 3, 2021), NHTSA–2021–0053

My name is Ann Jaworski. I am a staff attorney at the Environmental Law & Policy Center (ELPC). ELPC is the Midwest's leading public interest environmental and legal advocacy organization.

ELPC appreciates the opportunity to testify at today's hearing on the National Highway Traffic Safety Administration's (NHTSA) proposal to reset fuel economy standards for MY 2024-26 cars and light trucks. ELPC strongly supported the fuel economy standards issued in 2012 and opposed the prior administration's deeply flawed rollback of those standards. We support NHTSA's conclusion that the fuel economy standards set in 2020 were not the maximum feasible and that they should be revised.

ELPC urges NHTSA to adopt strong fuel economy standards by finalizing the set of standards listed as Alternative 3 in the proposal, and by not finalizing any "flexibilities" for automakers that are not required by statute and that do not result in real-world fuel economy improvements.

Strong fuel economy standards will benefit our national security and reduce energy security risks by mitigating the climate crisis.

ELPC is pleased that NHTSA has recognized "that the need of the United States to conserve energy must include serious consideration of the energy security risks of continuing to consume oil, which more stringent fuel economy standards can reduce. Reducing our Nation's climate impacts can also benefit our national security." 86 Fed. Reg. at 49,604. Transportation is currently the leading source

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of U.S. greenhouse gas emissions, contributing 29% of emissions.[1] Passenger cars account for 40.5% of U.S. transportation greenhouse gas emissions, and light-duty trucks account for 17.2%.[2]

The sixth assessment report recently issued by the United Nations' Intergovernmental Panel on Climate Change makes clear both climate change's human causes and its devastating impacts.[3] The report notes that human influence has warmed the climate at a rate that is unprecedented in at least the last 2,000 years.[4] Climate change is already affecting every inhabited region across the globe, with central and eastern North America experiencing increased heavy precipitation and western North America experiencing increases in extreme heat and drought.[5]

ELPC is particularly concerned about the threat climate change poses to the Midwest and the Great Lakes. The region is home to 61 million people and to the auto industry; it is also a significant engine for agriculture. Temperatures in the Midwest are rising due to climate change. Warmer temperatures impact public health with increased frequency of deadly heat waves and worsening air quality.

The impacts of climate change include impacts on the environment, agriculture, public health, and infrastructure, including critical energy and transportation infrastructure, that can compromise America's energy security and national security.

Strong fuel economy standards will increase equity by saving American consumers money and promoting public health.

Fuel-efficient cars save Americans money at the gas pump and are especially important for low-income Americans, who spend a greater proportion of their income on gasoline. Assuring that new cars sold today are as efficient as possible means that fuel-efficient used cars will be available in a few years. And, as NHTSA notes, "more stringent CAFE standards will help to encourage industry to continue improving the fuel economy of all vehicles, rather than simply producing a few electric vehicles, such that all Americans can benefit from higher fuel economy and save money on fuel." 86 Fed. Reg. at 49,604.

Fuel-efficient vehicles also have lower tailpipe emissions of pollutants like particulate matter that harm human health. Because low-income communities and communities of color are more likely to live next to highways and to disproportionately suffer the health burdens of air pollution, ensuring all cars are as fuel efficient as possible helps to promote both public health and equity.

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[1] U.S. Environmental Protection Agency, *EPA 430-R-21-005, Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990–2019*, ES-27 (April 2021), https://www.epa.gov/sites/default/files/2021-04/documents/us-ghg-inventory-2021-main-text.pdf?VersionId=yu89kg1O2qP754CdR8Qmyn4RRWc5iodZ.
[2] *Id.* at 2-37.
[3] IPCC, *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* (Aug. 2021), https://www.ipcc.ch/report/ar6/wg1/#FullReport.
[4] IPCC, 2021: Summary for Policymakers at SPM-7. In: *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.*
[5] *Id.* at SPM-12.

Strong fuel economy standards are feasible and spur adoption of fuel saving technology.

Strong fuel economy standards spur innovation in the auto manufacturing industry, which is critical to the economies and well-being of Midwest states—from Michigan, Ohio, Indiana, Minnesota, and Wisconsin, to the Dakotas.

Past analysis by the Blue Green Alliance and Natural Resources Defense Council concluded that there were nearly 290,000 jobs in the advanced technology vehicle sector. These are workers making more efficient cars and trucks possible. Across the Midwest, according to that report, there were a total of 151,714 jobs in 480 facilities associated with making cleaner vehicles. Three states—Michigan, Indiana, and Ohio—topped the list.[6]

Auto manufacturers can comply with NHTSA's proposed standards through adoption of existing fuel saving technologies that can be cost-effectively applied automobile fleets.

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Thank you for the opportunity to comment today. ELPC will be joining with partners to submit written comments to the docket.

Respectfully,

/s/ Ann Jaworski
Staff Attorney
Environmental Law & Policy Center

[6] *Supplying Ingenuity II: U.S. Suppliers of Key Clean, Fuel-Efficient Vehicles Technologies* (May 2017), https://www.nrdc.org/sites/default/files/supplying-ingenuity-clean-vehicle-technologies-report.pdf.