

**NHTSA Public Hearing on 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**

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My name is Ann Mesnikoff. I am the Federal Legislative Director for 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 NHTSA’s proposed CAFE standards for new cars, light trucks, heavy duty pickups, and vans. This topic is especially timely, given that gas prices are on the rise, and CAFE standards are one tool to help reduce the burden of fluctuating oil prices on consumers. NHTSA has a record of setting CAFE standards that successfully save consumers money at the pump, reduce oil use, increase our energy security, and protect our health.

As NHTSA notes in the NPRM and DEIS, the transportation sector is the leading source of US climate pollution as well as a major source of emissions of certain criteria pollutants or their chemical precursors. There is a lot of work to be done to address both.

According to the DEIS, in 2021, the transportation sector accounted for 78.8 percent of total U.S. petroleum consumption. In 2050, transportation is expected to account for 79.1 percent of total U.S. petroleum consumption. Even under the strongest of the presented alternatives total vehicle fuel consumption between 2022 and 2050 will be 2,548 billion gallons.

Additionally, the DEIS notes, “in 2023, passenger cars and light trucks are estimated to contribute:

- 86 percent of U.S. highway emissions of CO,
- 57 percent of highway emissions of PM2.5, and
- 65 percent of highway emissions of PM10.

In 2023, HDPUVs are estimated to contribute:

- 11 percent of highway emissions of CO,
- 8 percent of highway emissions of PM2.5, and

- 8 percent of highway emissions of PM10.

Almost all of the PM in motor vehicle exhaust is PM2.5; therefore, this analysis focuses on PM2.5 rather than PM10.”

While my comments today focus on the LDV standards these facts make clear the urgent need for NHTSA to set final standards for the full range of vehicles covered in the proposal that live up to the charge in the underlying law – set standards that “the maximum feasible average fuel economy level.”

Reducing oil consumption and pollution from America’s cars and light trucks is critical to protecting the climate and achieving President Biden’s goals, our commitments in rejoining the Paris Climate agreement, and to have even a chance of preserving a safe climate for our kids and theirs.

Today I would like to make three points:

First, the climate crisis is playing out across the country and world and demands urgent and strong action.

The latest IPCC reports make clear both the human causes of climate change and its devastating impacts. June, July and August have all been record breaking hot months with tragic natural disasters in the US and abroad playing out. Cities from coast to coast have been choked with smoke from wildfires impacting health and communities. We cannot look the other way.

ELPC is specifically concerned about the threat the climate crisis 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. Warmer temperatures impact public health with increased frequency of harmful heat waves and storms and worsening air quality.

The Great Lakes are the largest freshwater ecosystem on earth, containing 21% of the world’s freshwater supply and providing drinking water for over 42 million people. The available water supply helps to drive the regional economy. Commercial and recreational fishing, alone, in the Great Lakes inject over \$5 billion into the economies of the surrounding states.

The changing climate brings increased storm intensity, changes to water temperatures, flooding, runoff and algal growth – all presenting a significant and increasing threat to the Great Lakes.

NHTSA must do its part to ensure we avert the worst impacts of the climate crisis.

Second, NHTSA must issue final standards at least as strong as the option identified as Alternative 3PC/5LT.

The climate crisis significantly driven by burning oil for transportation should leave no doubt that NHTSA must adopt standards at least as strong as Alternative 3 with 3 and 5% annual increases for cars and trucks respectively. This level of standard is achievable and would yield a new vehicle fleetwide average of 61.48 mpg as compared to 57.74 mpg under NHTSA's weaker preferred alternative.

But let's be clear, NHTSA's standards are as much as 30% above what these vehicles will actually achieve. Achieving a fleetwide average of 47 or so miles per gallon in 2032 in the face of the climate crisis is disappointing. NHTSA should do nothing less than that.

Alternative PC1LT3 and Alternative PC3LT5 would decrease these emissions by less than 1 and 5 percent, respectively, through 2100. Alternative PC2LT4, the preferred alternative, would decrease these emissions by 2 percent through 2100. Alternative PC6LT8 would decrease these emissions by 16 percent through 2100.

Third, stronger standards will strengthen clean car innovation and manufacturing.

A strong auto manufacturing base is critical to the economies and well-being of states where ELPC works to protect public health and the environment--from Michigan, Ohio, Indiana, Minnesota, and Wisconsin, to the Dakotas. In fact, American manufacturers are plugged into a world economy.

While so much attention is on the essential transition to electric vehicles, NHTSA's standards are central to ensuring the gasoline powered vehicles sold in the US will use less fuel and emit less climate and air pollution. Vehicles sold in 2032 will be consuming oil for years. An all-electric vehicle future fueled by clean energy is the goal, but we cannot afford to let gasoline powered vehicles languish while we strive to get to that goal. Driving the evolution of the internal combustion engine to greater efficiency is core to NHTSA's standards.

Conclusion

The climate cannot afford weak standards that will lock in greater oil consumption and more climate pollution. NHTSA must finalize standards at least as strong as the third alternative and the strongest standards for medium and heavy duty pickups and vans and do so quickly.

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