

I am Ann Mesnikoff with the Environmental Law & Policy Center. ELPC works across the Midwest Great Lakes region.

CAFE standards have successfully saved consumers money at the pump, reduced oil use, increased our energy security and help to protect our climate and our health.

Transportation remains the leading source of US climate pollution air pollution from tailpipes and the oil supply chain.

NHTSA should leave the 2024 standards in place; it's NO ACTION alternative. Any other alternative increases oil consumption, climate and air pollution and consumer costs and compromises competitiveness – it is a gift to the oil industry and defies common sense.

Today I will make three points:

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

Climate change is impacting the Great Lakes and our region, including public health with increasing the frequency of harmful heat waves and storms and worsening air quality. It is increasing water temperatures, driving flooding, and harmful algal growths; these all present significant and increasing threats to the Great Lakes and region.

I will add ELPC's Great Lakes climate threats [reports](#) to the docket.

This rollback is an attack on effective climate action.

Second, NHTSA's proposal undermines affordability for American drivers.

NHTSA is taking dollars out of consumer's pockets to bolster big oil when transportation is the second largest household expense after house. This will not help affordability; it could leave \$23 billion in savings at the pump the 2024 standards would deliver, or far more given the rollback goes back to 2022 standards, on the table (or in big oil's pockets).

NHTSA claims the proposal will save new car buyers \$900. If the industry backslides on putting fuel saving technologies to work, consumers will be paying

more at the pump every time they fill up, overwhelming any conceivable savings on new vehicles.

Third, NHTSA's proposal undermines technological innovation and US leadership with a backwards looking set of weak standards.

The 2024 standards ensure that gasoline powered vehicles sold in the US will use less fuel, which is core to the CAFE law, and emit less climate and air pollution.

An all-electric vehicle future fueled by clean energy is needed, but CAFE standards ensure new gasoline powered vehicles improve.

NHTSA's proposal turns the need of the US to conserve energy on its head. Somehow NHTSA believes that marginally better gas guzzling vehicles is the right goal, while the world market is racing toward electric vehicles. This proposal will yield a real-world standard closer to a weak 27 mpg in 2031.

The auto industry has not proven it will innovate without strong standards. NHTSA is setting us all back in time and consumers and the climate and our health cannot afford the price.

Thank you for the opportunity to testify today.