February 4, 2026

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

Re: Docket NHTSA -2025-0491
The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks

Dear Administrator Morrison:

On behalf of the undersigned health, medical and nursing organizations, we call on the National Highway Traffic Safety Administration (NHTSA) to withdraw the proposed rollback of fuel economy standards. This proposal represents a departure from decades of progress in increasing efficiency, reducing oil consumption and protecting the health and financial well-being of American families.

Transportation represents a major cost to American families, and it is a major contributor to the air quality and health costs facing too many communities across the United States. Strong federal standards are critical tools to reduce pollution-related harm to children, seniors and others most vulnerable to poor air quality caused by vehicle traffic. We call on NHTSA to withdraw this proposal, as it fails to meet statutory requirements and compounds existing health and economic concerns.

NHTSA proposal abandons vehicle efficiency gains and costs consumers.

The federal government has regulated the fuel economy of motor vehicles since 1975 to help consumers save money and reduce petroleum dependence. Since 2001, fuel economy standards have helped drive innovation in efficiency improvements, delivering over $9,000 in consumer savings over the lifetime of the average new car sold in the U.S. in 2024, according to Consumer Reports.[1] Another analysis found that fuel economy improvements have delivered average annual savings of $630-840 to households over the past 15 years.[2]

NHTSA's weakening proposal falls short of statutory direction on several fronts and will result in more consumer costs and more pollution. Under federal law, NHTSA must set maximum feasible standards for no more than five model years. The proposal stands at odds with this provision by proposing revisions to the standard back across two prior administrations to affect model years 2022-2031. Further, Congress required fuel economy standards of 35 miles per gallon by 2020, which served as the basis for increasing efficiency levels to the present-day standards that would achieve 54.5 miles per gallon by 2030. By contrast, this proposal calls for a fleet average of 34.5 MPG, not even as stringent as standards set for 2020 and lower than the industry has proven possible through real-world performance.

The importance of real-world technology gains is missing from the proposal. NHTSA's proposal to weaken fuel economy ultimately hinges on ignoring the efficiency of the real-world vehicle fleet, which includes a wide range of vehicle technologies, including more efficient gasoline combustion engines, hybrids, plug-in technologies and other alternative fuels.[3] Essentially, NHTSA's proposal disregards statutory direction, technological advancement and real-world conditions to justify rolling back standards to the detriment of American families.

Traffic pollution harms health, and the NHTSA proposal will add to those harms.

Exposure to traffic pollution is known to contribute to premature death due to cardiovascular disease and lung cancer, asthma onset in children and adults, and increased risk of respiratory infection in children, among other risks.[4] Today, nearly 46% - 156.1 million Americans – live in a community impacted by unhealthy levels of air pollution.[5] Climate impacts including extreme heat, devastating storms and catastrophic wildfires are making the job of cleaning the air more difficult and amplifying public health burdens. Combustion of fossil fuels in the transportation sector is a leading source of air pollution and climate impacts, meaning that NHTSA's fuel economy standards have the potential to significantly benefit health and provide a healthier future for all, but the proposal instead increases these harms.

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[1] Consumer Reports. Blog: Strong Efficiency and Emissions Standards Deliver Thousands in Fuel Savings for Consumers. January 2025. https://advocacy.consumerreports.org/research/blog-strong-efficiency-and-emissions-standards-deliver-thousands-in-fuel-savings-for-consumers/

[2] Natural Resources Defense Council. Fact Sheet: The Real Road to Energy Independence - Clean Car and Fuel Economy Standards. March 2022. https://www.nrdc.org/sites/default/files/energy-independence-clean-car-standards-fs.pdf

[3] United States Environmental Protection Agency. The 2024 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975, Executive Summary (EPA-420-S-24-001, November 2024)

[4] Health Effects Institute. Systematic Review and Meta-analysis of Selected Health Effects of Long-Term Exposure to Traffic-Related Air Pollution. April 2023. https://www.healtheffects.org/system/files/hei-special-report-23_6.pdf

[5] American Lung Association. State of the Air 2025. April 2025. https://www.lung.org/research/sota

Improving the efficiency of vehicles reduces the pollution that those vehicles emit. The existing standards that this proposal would weaken are projected to significantly reduce pollution, saving hundreds of lives.[6] In the proposed rule, NHTSA documents that the new proposal would result in over 450 premature deaths, nearly 14,000 asthma attacks and other health emergencies between 2024 and 2050 due to increased air pollution.[7] At a time when healthcare costs are skyrocketing, this rollback will add to both financial burdens and health emergencies that families across the country are already feeling.

NHTSA must withdraw this proposal and focus on implementing existing standards.

NHTSA's existing standards were designed to be protective of health, family budgets and the environment. Transportation remains expensive for consumers. Enforcing the current fuel economy standards will help American families save over $23 billion in total fuel savings and save over 70 billion gallons of fuel. By maintaining and enforcing strong standards, NHTSA can continue to protect health and family budgets consistent with what long standing fuel economy standards have done at the federal level.

Sincerely,

Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American College of Physicians
American Lung Association
American Medical Association
American Public Health Association
American Thoracic Society
Asthma and Allergy Foundation of America
Children's Environmental Health Network
Climate Psychiatry Alliance
International Society of Environmental Epidemiology-North America Chapter
MI Air MI Health
Michigan Clinicians for Climate Action
Mothers & Others For Clean Air
Medical Society Consortium on Climate and Health
National Association of Pediatric Nurse Practitioners
National League for Nursing
Physicians for Social Responsibility
Regional Asthma Management & Prevention (RAMP)

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[6] NHTSA Final Rule: Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond, Table V-24: Emission Health Impacts Across Alternatives Relative to the No-Action. June 2024. https://www.nhtsa.gov/sites/nhtsa.gov/files/2024-06/CAFE-2027-2031-HDPUV-2030-2035_Final-Rule_web_0.pdf

[7] NHTSA NPRM: The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks. Table IV-29: Emission Health Outcomes Across Alternatives Relative to the No-Action. December 2025. CAFE-LD-2022-2031-Notice-of-Proposed-Rulemaking.pdf