

As Prepared for Delivery

Comments of Paul G. Billings
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On

The National Highway Traffic Safety Administration Proposed Rule:
Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and
Light Trucks,
Docket ID No. NHTSA-2021-0053

Good morning, I am Paul Billings, National Senior Vice President of Public Policy at the American Lung Association. Thank you for the opportunity to speak. The Lung Association supports NHTSA's proposal to strengthen fuel efficiency standards, and we urge you to finalize a rule that maximizes emissions reductions and health benefits and avoid loopholes that would reduce the real-world impacts of this rule. We then urge you to move forward with future rules that drive the nationwide transition to zero-emission vehicles.

Air pollution is a major threat to public health, and it discriminates against Black and Brown communities and low-income communities. Air pollution causes tens of thousands of people to die prematurely each year in the United States, and motor vehicles are a leading source of the emissions that create ozone, or smog, and particle pollution.

The American Lung Association's most recent "State of the Air" report found that more than 135 million people in the United States live in counties with unhealthy levels of air pollution. Our report also found that people of color are much more likely to live in counties with failing grades for air pollution than white Americans.

Transportation is also the nation's leading contributor to climate change.

We know that people who live near roadways, oil and gas operations including refineries bear a disproportionate burden of air pollution, and that climate change is making that pollution worse. Let's me repeat this, climate change is making air quality worse.

My time is very short, so I want to make a few brief points.

First: climate change is a health emergency. The Intergovernmental Panel on Climate Change found that the planet is on a path toward catastrophic destruction if we do not make serious cuts in our greenhouse gas emissions as soon as possible.

From deadly storms to wildfires that destroy communities, no one can escape the lethal consequences and the urgent need to act. Setting the strongest CAFE standards is an important component of the United States' response to climate change.

Next: NHTSA must maximize the real-world efficiency advancements from this program. I urge NHTSA not to lock in schemes or credits that would lead to fuel efficiency advancements on paper that don't result in real-world fuel efficiency gains.

Next: In the proposal, NHTSA laid out alternatives. I urge you to finalize a rule that's at least as strong as Alternative 3. Alternative 3 is the most stringent and most well-aligned with protecting health. Alternative 3 would have the greatest health benefits, including lives saved,

and the greatest greenhouse gas reductions of the options NHTSA included in its proposal. Alternative 3 should be the minimum starting place for the final rule and for the next round of standards.

Lastly, I call on NHTSA to finalize strong standards to make sure that they can go into effect for cars for model year 2024, and NHTSA should then move forward with the next set of strong rules.

We need to get on track for the long term to address the scale of the problems posed by climate change by cutting fossil fuel consumption and associated emissions as quickly as possible from gasoline cars and increasing the adoption of electric vehicles so that we can get to a 100 percent electric new car market by 2035.

In conclusion, climate change is a health emergency. NHTSA must maximize the efficiency advancements, minimize the loopholes, drive the nation towards electric vehicles and promptly finalize this rule to implement the regulations in model year 2024.