



October 26, 2021

National Highway Traffic Safety Administration (NHTSA)  
Docket No. NHTSA-2021-0053

On behalf of National Parks Conservation Association (NPCA) and our more than 1.6 million members and supporters we submit the following comments regarding NHTSA's proposal to revise national Corporate Average Fuel Economy (CAFE) standards for passenger cars and light trucks from model years 2024 through 2026.

We thank NHTSA and the Biden administration for following through on the promise to act swiftly to address fuel economy for cars and light-trucks. This proposal is an important first step towards improving passenger vehicle technology, saving Americans billions in excessive fossil fuel costs, and addressing the significant clean air and climate pollution levels from this sector. The transportation sector now accounts for more greenhouse (GHG) emissions than any other sector in the U.S.—with passenger vehicles making up the bulk of those emissions. Therefore, we strongly urge NHTSA to move forward with the most stringent CAFE standards feasible.

As America's leading voice working to protect and preserve our national parks, NPCA is well aware of the dual threats that air pollution and climate change pose to our public lands and local communities. In addition to the GHGs they emit, passenger vehicles contribute high levels of traditional air pollutants that harm all our beloved national parks as well as people, wildlife and delicate ecosystems. These pollutants include nitrogen oxides, particulate matter, ozone, and sulfur dioxide, which directly harm the health and wellbeing of park visitors, staff, wildlife, and threaten biodiversity while also contributing to the significant impairment of visibility in our parks.

Nearly 90% of national parks are plagued by haze pollution. On average, park visitors miss out on 50 miles of scenery across our national parks, with haze cutting down on as many as 90 miles of average visibility in the parks most impacted by vehicle pollution, such as Sequoia and Kings Canyon. With 48 national parks listed as Class 1 areas under the Clean Air Act's Regional Haze Rule, strong action is needed now by the federal government to help restore visibility to natural levels in all Class 1 areas. This action is particularly timely and necessary as states are currently amid the regional haze state implementation planning process through which reductions to improve visibility are required by 2028.

Nearly all 423 national park units are harmed by climate change impacts, including runaway heat waves, drought, sea level rise, flooding, and wildfires. If we do not act quickly to mitigate emissions driving and exacerbating the climate crisis, we could very well lose many of our national park system's treasured namesake features, such as the glaciers in Glacier National Park, the Joshua trees in Joshua Tree National Park, the everglades in Everglades National Park, the saguaro cacti in Saguaro National Park, and the sequoias in Sequoia National Park. The myriad natural and cultural resources found within America's national park system are priceless. We must do all we can to protect these natural and cultural heritage treasures from climate change and pass on the legacy of our national parks unimpaired to future generations.

Beyond our parks and environment, we need bold CAFE standards that strongly consider the outsized role that environmental justice and public health play in this crisis. Communities of color and low-income individuals far too often bear disproportionate levels of economic and health consequences from high fuel costs as well as from air pollution and climate instability. A strong CAFE standard will provide clear benefits for these communities across the nation—from improving localized health outcomes in hot spot communities, to saving average Americans billions at the pump.

To meet our national climate goals, protect our communities, and preserve our beloved public lands for generations to come, NPCA firmly believes we must move forward with new CAFE standards that achieve greater total fuel economy improvements than what would have been achieved under the previous Obama-era rules. Strong standards will help contribute to keeping global temperatures below a 1.5°C change from pre-industrial levels, which climate scientists believe is the key threshold necessary to prevent the worst climate impacts to our planet.

Of the alternatives provided in the proposed rule, **NPCA urges NHTSA to move forward with a rule that is no less stringent than Alternative 3 and would result in an increase in CAFE stringency of at least 10% annually through model year 2026.** We believe Alternative 3 is economically and technologically feasible, would reduce more pollution than the other listed alternatives, and has higher net economic and social benefits compared to both NHTSA's preferred Alternative 2 or the significantly weaker Alternative 1.

Only with bold action to improve passenger vehicle fuel economy in the short term can the administration set America on a path towards achieving the necessary goal of 100% zero-emission vehicle sales by no later than 2035. The actions NHTSA takes now will have lasting effects on our parks and communities for generations to come. **We appreciate your consideration of our comments and ask that you please move forward with the most stringent standards feasible.**

Sincerely,

A handwritten signature in black ink that reads "MARK ROSE". The letters are in all caps and have a slightly cursive, informal style.

Mark Rose  
National Parks Conservation Association