



The Honorable Sean Duffy  
Secretary, U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

February 4, 2026

Docket ID No. NHTSA-2025-0491

Dear Secretary Duffy,

I write on behalf of the U.S. Climate Alliance, a bipartisan coalition of 24 governors who together represent approximately 60 percent of the U.S. economy and 55 percent of the U.S. population. We are deeply concerned by the National Highway Traffic Safety Administration's (NHTSA) proposal to substantially weaken fuel economy standards for light-duty vehicles under the Corporate Average Fuel Economy (CAFE) program.<sup>1</sup> Federal fuel economy standards have helped save Americans money on gasoline for 50 years while improving America's air quality, energy security, and global competitiveness. This flawed proposal would abandon decades of progress and leave Americans breathing dirtier air and paying more at the pump. We urge that it be withdrawn.

Congress established the fuel economy program in the 1970s to reduce our nation's dependence on foreign oil and limit Americans' exposure to energy price shocks.<sup>2</sup> At a time when household costs remain too high and too vulnerable to gas price volatility, these goals are as critical today as they were then. Thankfully, the CAFE program has five decades of success in achieving its objectives. Between 1975 and 2018, fuel economy almost doubled, helping save Americans at least two trillion gallons in gasoline and creating nearly \$5 trillion in fuel cost savings.<sup>3</sup> Between 2003 and 2021, average fuel economy improved 30 percent, saving Americans an average of \$7,000 in per-vehicle lifetime costs without increasing vehicle costs or compromising vehicle safety.<sup>4</sup> And current standards, which DOT now proposes to roll back, would build on this progress by lowering fuel costs an estimated \$82 billion and saving 64 billion gallons of gasoline through 2050,<sup>5</sup> in addition to delivering cleaner air and improved public health.<sup>6</sup>

The Alliance's members are demonstrating through a suite of state-level policies and actions that we can lower fuel consumption and deliver cleaner air while also ensuring affordability, growing our economy, and creating good-paying jobs. It is a false choice to suggest the United States must sacrifice one of these goals to support another. Although our states and territories represent almost 60 percent of the U.S. economy, they collectively consumed less than half of the gasoline used for transportation in the United States between 2005 and 2023.<sup>7</sup> During that same time, the Alliance's members grew their collective GDP by 34 percent, generated far fewer harmful air pollutants per capita than the rest of the country,<sup>8</sup> advanced innovative approaches to lower the cost of purchasing newer and cleaner cars, and helped provide Americans more vehicle models to choose from.<sup>9</sup> Of note, many of these cleaner

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<sup>1</sup> NHTSA. "[The Safer Affordable Fuel-Efficient \(SAFE\) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks](#)." December 5, 2025.

<sup>2</sup> Congressional Research Service. "[Vehicle Fuel Economy and Greenhouse Gas Standards: Frequently Asked Questions](#)." Updated June 1, 2021.

<sup>3</sup> Greene, David L., Charles B. Sims, and Matteo Muratori. "Two Trillion Gallons: Fuel Savings from Fuel Economy Improvements to US Light-Duty Vehicles, 1975–2018." *Energy Policy* 142 (July 2020): 111517. <https://doi.org/10.1016/j.enpol.2020.111517>.

<sup>4</sup> Consumer Reports. "[Vehicle Price Trends: Fuel Economy and Safety Improvements Come Standard](#)." February 21, 2023.

<sup>5</sup> NHTSA. "[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](#)." June 24, 2024.

<sup>6</sup> NHTSA. "[Final Regulatory Impact Analysis 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](#)." June 2024.

<sup>7</sup> Based on analysis of U.S. Department of Transportation Bureau of Transportation Statistics. "[State Transportation Sector Energy Consumption](#)." Accessed December 12, 2025.

<sup>8</sup> U.S. Climate Alliance. "[Pressing Forward: Governors' Enduring Fight for a Resilient & Sustainable Future](#)." November 2025.

<sup>9</sup> The International Council on Clean Transportation. "[Market Spotlight: Electric Vehicle Market and Policy Developments in U.S. States, 2023](#)." May 2024.

options are electric vehicles — which automakers are allowed to use for program compliance<sup>10</sup> — that offer even greater affordability benefits, given lower maintenance and refueling costs. On average, electric vehicles are estimated to save consumers an average of \$10,000 over a car’s lifetime.<sup>11</sup>

In contrast, this proposal would make vehicles even more expensive for Americans to own and drive. The administration claims its proposal will lower the average cost of a new vehicle by \$925,<sup>12</sup> but a car’s affordability is more than just its upfront price — it also includes operation and maintenance costs. NHTSA’s own analysis shows this proposal would raise fuel costs by more than \$1,400 per vehicle. In total, the American public would face nearly \$280 billion in additional costs through 2050 compared to the existing standards, far exceeding any initial upfront savings. Additionally, the rule would increase fuel consumption by 96 billion gallons through 2050, making Americans much more susceptible to gasoline price spikes and global instability in the decades to come.<sup>13</sup>

The proposal also threatens to exacerbate regulatory uncertainty and instability for U.S. automotive manufacturers that have already faced a series of destabilizing actions from the federal government. These actions have included attempts to terminate funding for clean vehicle infrastructure,<sup>14</sup> impose tariffs and disrupt supply chains,<sup>15</sup> eliminate consumer credits for purchasing an electric vehicle,<sup>16</sup> dismantle states’ clean vehicle programs,<sup>17</sup> and eliminate all greenhouse gas emission standards for light-duty vehicles.<sup>18</sup> Automakers need a stable regulatory environment to make long-term investment decisions worth many billions of dollars about their manufacturing plants, supply chains, and product lines.<sup>19</sup> Unfortunately, NHTSA’s rule would do the opposite, further constraining innovation and putting American manufacturers at a significant competitive disadvantage in the global automotive market. Additionally, more than 7,000 jobs would be lost in this sector by model year 2031, according to the agency’s own analysis.<sup>20</sup>

If finalized, these weakened standards would abandon Congress’s clear intent with the fuel economy program by increasing fuel consumption and reducing energy security,<sup>21</sup> while hiking costs on Americans when they can least afford it. We urge you to reverse course and withdraw this proposal. Instead, we ask that you recommit to the goals of fuel conservation and fuel efficiency, including through adoption of cleaner vehicles like electric vehicles and hybrids, to deliver an America that is truly more affordable and more energy secure for all.

Sincerely,



**Casey Katims**

Executive Director  
U.S. Climate Alliance

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<sup>10</sup> See 49 USC § 32904(a) (2007).

<sup>11</sup> Woody, Maxwell, Shawn A. Adderly, Rushabh Bohra, and Gregory A. Keoleian. “Electric and Gasoline Vehicle Total Cost of Ownership across US Cities.” *Journal of Industrial Ecology* 28, no. 2 (2024): 194–215. <https://doi.org/10.1111/jiec.13463>.

<sup>12</sup> NHTSA. “Preliminary Regulatory Impact Analysis The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks.” December 2025.

<sup>13</sup> University of California at Berkeley Haas School of Business. “Explainer: The myth of ‘energy independence.’” March 24, 2022.

<sup>14</sup> Washington State Office of the Attorney General. “Judge rules USDOT illegally withheld funds for EV charging infrastructure.” January 26, 2026.

<sup>15</sup> The White House. “Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits.” April 2, 2025.

<sup>16</sup> Public Law 119-21, Jul. 4, 2025, 139 Stat. 72.

<sup>17</sup> Public Law 119-16, Jun. 6, 2025, 139 Stat. 66.

<sup>18</sup> U.S. Environmental Protection Agency. “EPA Releases Proposal to Rescind Obama-Era Endangerment Finding, Regulations that Paved the Way for Electric Vehicle Mandates.” July 29, 2025.

<sup>19</sup> Holland & Knight. “In the Headlines: Trump Plans to Weaken Fuel Efficiency Rules for Cars and Trucks.” December 3, 2025.

<sup>20</sup> NHTSA. “Preliminary Regulatory Impact Analysis The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks.” December 2025.

<sup>21</sup> See Public Law 94-163, §2, Dec. 22, 1975, 89 Stat. 874 and Public Law 110-140, Dec. 19, 2007, 121 Stat. 1492.