

Submitted via <https://www.regulations.gov>

U.S. Department of Transportation
National Highway Transportation Safety Administration (NHTSA)
Docket ID No. NHTSA-2025-0491
Submitted via www.regulations.gov

RE: Connecticut DEEP Comments on “The Safer Affordable Fuel-Efficient Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks” (“SAFE III Proposal”)

To Whom It May Concern,

The State of Connecticut Department of Energy and Environmental Protection (DEEP) submits these comments in opposition to NHTSA’s SAFE III Proposal. (90 Fed. Reg. 56,438).¹ Robust and achievable fuel economy standards are essential to protect air quality and public health in communities in the State of Connecticut and across the country. The federal government should not retreat from its obligation to protect public health and, as importantly, put American national security interests further at risk by increasing oil demand from geopolitically unstable areas.

Congress established fuel economy standards in the 1970’s to advance a clear national policy objective to steadily improve the efficiency of new vehicles sold in the United States. These standards were designed to reduce the nation’s dependence on foreign oil, strengthen energy security, and limit Americans’ exposure to volatile fuel prices². These increased fuel economy goals remain as critical today as they were 50 years ago. The proposed Safe III rule falls well below the compliance requirements that the private sector has been meeting for over a decade, with significant implications for air pollution and public health. This proposal undermines Connecticut’s efforts to equip families facing affordability challenges with the tools and opportunities needed for economic stability. By locking in higher fuel demand, the proposal would increase oil price volatility and drive higher gasoline prices. At a time when household costs are

¹ 1 NHTSA. “The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks.” December 5, 2025.

² 2 Congressional Research Service. “Vehicle Fuel Economy and Greenhouse Gas Standards: Frequently Asked Questions.” Updated June 1, 2021.

already too high for Connecticut families, the federal government should be focused on enhancing affordability rather than driving those costs up.

Federal fuel economy standards are one of the most effective tools available to state and local air agencies for controlling air pollution. The SAFE III proposal represents a substantial weakening of fuel economy requirements, with significant implications for air quality, public health, and state and local regulatory authority. The proposal would reduce the 2031 fleet-wide standard to approximately 34.5 miles per gallon, a reduction of 31.5% from the previous target. NHTSA projects the proposal would increase fuel consumption by 96 billion gallons, increase CO₂ emissions by 1,052 million metric tons, result in 473 additional deaths from criteria air pollutant emissions, and cost consumers \$279.7 billion through 2050.³

MOBILE SOURCE EMISSIONS IN CONNECTICUT: THE CRITICAL ROLE OF FEDERAL VEHICLE STANDARDS IN IMPROVING AIR QUALITY

In Connecticut, the transportation sector is responsible for about 40% of GHG emissions and 70% of smog forming emissions. This sector also accounts for over 300 tons of fine particulate matter (PM_{2.5}) every year.⁴ These pollutants worsen asthma, heart disease, and respiratory illness, especially for our most vulnerable populations as well as increasing morbidity. Respiratory-related illnesses cost Connecticut tens of millions of dollars annually—we incurred nearly \$120 million in acute care charges due to asthma in 2023 alone.

Weakening fuel economy standards could be particularly harmful in Connecticut, which is significantly impacted as a heavily trafficked state in New England. According to the Bureau of Transportation Statistics, Connecticut's 2023 vehicle miles traveled (VMT) on state highways totaled 30,503 million, placing it third among Northeastern states in VMT per square mile at 5.55 million—just behind Massachusetts (5.76) and Rhode Island (6.23). This density underscores Connecticut's heavily trafficked infrastructure relative to its land area, far surpassing states like New York (2.20), New Hampshire (1.45), Vermont (0.75), and Maine (0.42).⁵ Connecticut's intense transportation activity and the

³ See [Preliminary Regulatory Impact Analysis: Safer Affordable Fuel-Efficient \(SAFE\) Vehicles Rule III, MY 2022 to 2031 Passenger Cars and Light Trucks](#) Tale 8-15 p. 121

⁴ See Connecticut 2017 Periodic Emissions Inventory On-road data using MOVES4.0.1 portal.ct.gov/-/media/deep/air/inven/2014-and-2017/attachment-a2-state-of-connecticut-2017-pei.pdf?rev=5683538bd3e245d79f4a69a1f9d5ebc6&hash=F40650EB99C02271DF3F62156CDA3C16

⁵ U.S. Department of Transportation, Bureau of Transportation Statistics. *State Highway Travel*. Accessed August 2025. <https://www.bts.gov/browse-statistical-products-and-data/state-transportation-statistics/state-highway-travel>

high-VMT of the region heightens the need for robust fuel economy standards to mitigate environmental and public health impacts.

Robust standards are also necessary to achieve the mobile-source emission reductions needed in Connecticut to attain the federal health-based standards for ozone, and ozone precursors such as NO_x and VOC. The southwestern portion of the state known as the (NY-NJ-CT) ozone nonattainment area, is designated as “severe” under the 2008 NAAQS standard. The rest of the state, known as the Greater Connecticut ozone non-attainment area, is designated as “serious.”⁶

Federal fuel-economy standards shape the emissions profile of the entire fleet operating across Connecticut and the country, making these standards critical to the state’s air-quality strategy. Any further weakening of federal vehicle standards could create gaps in the Connecticut SIP strategy, which the state relies on to demonstrate future attainment of the NAAQS. Consequently, Connecticut could be forced to identify alternative policy measures to reduce emissions - likely from sectors where controls are technologically limited or economically prohibitive.

Connecticut consistently struggles to meet federal health-based ozone standards, as a result, residents experience an average of 23 high-ozone days each year—days that pose serious risks to public health and damage the environment. For Connecticut, the need for robust fuel economy standards is urgent. Communities in Connecticut continue to face exposure to vehicle-related air pollution and the upstream health effects of fuel production and consumption. It affects the lives of our most vulnerable neighbors through shortened lives, worsened health, and diminished prosperity. Fuel economy standards are one of the most effective tools available to assist states in reducing air pollution. Central to DEEP’s mission is protecting the public health of millions of Connecticut residents—particularly children, older adults, and those with asthma or heart disease—are routinely exposed to unhealthy ozone levels that worsen respiratory illness. Connecticut residents already struggle with high rates of respiratory illness, with 10.8% of adults in the state having asthma compared with the national average of 9.8%.⁷

⁶ Connecticut Department of Transportation. (2024). Conformity determination report: Ozone and PM_{2.5} air quality conformity determination of the 2023–2050 Metropolitan Transportation Plans and the 2025–2028 Transportation Improvement Programs. <https://portal.ct.gov/dmv/-/media/dot/policy/stip/2025-conformity-determination-report-february-2024.pdf>

⁷ American Lung Association. (2023). *Current asthma by state*. <https://www.lung.org/research/trends-in-lung-disease/asthma-trends-brief/data-tables/asthma-current-state>

The SAFE III Proposal will increase strain on public health systems, raise costs for consumer, and will diminish quality of life across the state. Weakening these standards will also make it significantly more difficult, and in many cases impossible, for agencies like DEEP to meet their Clean Air Act obligations and protect the people they serve. Meeting these challenges requires stronger, not weaker, federal vehicle standards.

DEEP supports the comments submitted by National Association of Clean Air Agencies and the U.S. Climate Alliance. Thank you for the opportunity to provide written comments.

Sincerely,



Katherine S. Dykes

Commissioner

Connecticut Department of Energy and
Environmental Protection