



United States  
Conference of  
Catholic Bishops

Office of the  
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**Submitted Electronically**

Jonathan Morrison,  
Administrator, U.S. National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building, Ground Floor  
Room W12-140  
Washington, D.C. 20590-0001

RE: Comment on the *The Safer Affordable Fuel Efficient (SAFE) Vehicles Rule III for Model Years 2022–2031 Passenger Cars and Light Trucks*  
RIN 2127-AM76; Docket Number NHTSA-2025-0491

Dear Mr. Morrison,

The United States Conference of Catholic Bishops (USCCB) respectfully submits this comment regarding the Department of Transportation's proposed SAFE Vehicles Rule III. As we have affirmed in past comments on federal transportation and environmental regulations, the Catholic Church's social teaching calls us to safeguard human life, promote the common good, and protect creation for current and future generations.<sup>1</sup> Public policy concerning transportation, fuel economy, and emissions has significant consequences for public health, economic opportunity, and ecological stewardship. For these reasons, we offer the following considerations.

The Notice of Proposed Rulemaking frames its proposed rollback of existing fuel-economy standards as a response to rising vehicle prices and concerns about affordability.<sup>2</sup> Affordability is an important concern for the Church. In our prior submissions, we have noted that lower-income households—who are most vulnerable to fuel costs and who often rely on older, less efficient vehicles—deserve particular attention in the development of national transportation policy. We share the NHTSA's goal of ensuring that all families, especially those with limited means, have access to safe, reliable, and affordable transportation, and we are grateful for your attention to this serious concern.

Though we support the intent, we do not agree that the proposed rule's lower fuel-economy standards achieve this necessary goal. The available evidence does not show that weakening fuel-economy standards will meaningfully improve affordability for these families. Analyses indicate that the primary drivers of rising vehicle prices in recent years include supply-chain disruptions, increased material and production costs, tariffs, and shifts in

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<sup>1</sup> USCCB Comment on Docket ID No EPA-HQ-OAR-2018-0794 (June 30, 2023) available online: <https://tinyurl.com/2wbx578a>; USCCB comment on Docket ID No. EPA-HQ-OAR-2018-0283 (Oct. 23, 2018) available online: <https://tinyurl.com/49fzwd9>

<sup>2</sup> *The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks*, 90 Fed. Reg. 56438 (Dec. 05, 2026)



manufacturer product offerings toward larger and more expensive vehicles.<sup>3</sup> The incremental cost of improving fuel efficiency accounts for only a small portion of overall price increases<sup>4</sup>. As a result, the proposed relaxation of standards is unlikely to materially reduce costs for consumers and may instead increase long-term fuel expenditures, disproportionately affecting lower-income households.

Several structural elements of the proposed rule raise additional concerns. Reclassifying all SUVs as cars, removing electric vehicles and plug-in hybrid electric vehicles and efficiency-enhancing technologies from the standard-setting framework, eliminating inter-manufacturer credit trading, and retroactively weakening previously achieved standards would substantially reduce incentives for the industry to achieve the standards and for the environmental and financial benefits that fuel-economy requirements have historically delivered.<sup>5</sup> Such changes risk undermining technological progress, reducing consumer savings on fuel, and weakening important environmental and public-health protections<sup>6</sup>. Retroactive weakening of standards is especially troubling, as it introduces regulatory uncertainty and departs from established practice.

We believe it is possible to address real concerns about affordability without diminishing the long-term goals of protecting public health and caring for creation. More targeted strategies—such as restoring or strengthening fuel efficient vehicles purchasing incentives for low- and middle-income consumers, encouraging the production and availability of vehicles that are both affordable and efficient, keeping the current rule in place, and making investments in public transportation<sup>7</sup>—offer more effective opportunities to support families who struggle most with transportation expenses. For example, to reduce costs, auto companies could make significant progress towards the current 2027 model year standards without high capital expenditure by shifting their entire fleet to the cleanest combustion engines available.<sup>8</sup>

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<sup>3</sup> *Is Now the Time to Buy, Sell, or Trade in a Car?* Kelly Blue Book (Jan. 20, 2026), available online: <https://tinyurl.com/mv6muavy>; Kyle Krumlauf and Erik Bahnsen, *Crash Course Q3 2025*, CCC (September 23, 2025), available online: <https://tinyurl.com/mubhftzz>; Joshua Linn and Beia Spiller, *Import Tariffs and the Market for Vehicles*, Resources for the Future (May 2025), available online: <https://tinyurl.com/mt3abj3p>; Chris Harto et al., *Vehicle Price Trends: Fuel Economy and Safety Improvements Come Standard*, Consumer Reports (Feb. 21, 2023), available online: <https://tinyurl.com/23zcxafka>

<sup>4</sup> Harto et al. “*Vehicle Price Trends: Fuel Economy and Safety Improvements Come Standard*,” Consumer Reports (Feb. 21, 2023) <https://tinyurl.com/yvc5w2pf>

<sup>5</sup> *The EPA Automotive Trends Report*, EPA (Nov. 2024), available online: <https://tinyurl.com/33k78u58>

<sup>6</sup> *Driving to Clean Air: Health Benefits of Zero Emissions Cars and Electricity*. American Lung Association. (June 2023), available online: <https://tinyurl.com/36dc9nwi>

<sup>7</sup> Gabriel Morrison, Alex Dallman, *How Commuters with Low Incomes Use Public Transit and How One City Expanded Ridership*, Urban Institute (May 16, 2025), available online: <https://tinyurl.com/et7e44pw>

<sup>8</sup> Kathy Harris and Luke Tonachel, *Shifting to Cleaner Gas Engines Can Help Reduce Emissions*, Natural Resources Defense Council (July 5, 2023) available online: <https://tinyurl.com/mv2yrfz8>



Public support for strong fuel-economy standards remains consistent.<sup>9</sup> Families across the country desire cleaner air, reduced fuel costs, and responsible stewardship of the environment their children will inherit. A regulatory approach that aligns economic opportunity with environmental protection is not only possible but necessary.

Pope Francis stressed the importance of rules, regulations, and policies to mitigate environmental degradation and climate change, and his successor, Pope Leo XIV has affirmed the continuity of the Church's position.<sup>10</sup> Robust CAFE standards that meet the maximum standard feasible are an important tool to achieve this.

For these reasons, the USCCB respectfully urges the NHTSA to reconsider the proposed rollback and to pursue approaches that genuinely improve affordability while preserving and advancing the nation's commitment to fuel efficiency and environmental responsibility. Policies that promote both economic justice and care for creation better reflect the dignity of all people and the common good we are called to uphold.

Respectfully submitted,

William Quinn  
General Counsel

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<sup>9</sup> *Fuel Economy: A Nationally Representative Multi-Mode Survey*, Consumer Reports. (Oct. 2022), available online: <https://tinyurl.com/mtat95wu>

<sup>10</sup> *Address of the Holy Father Leo XIV to the Participants in the "Raising Hope" Conference on the Tenth Anniversary of the Encyclical 'Laudato Si,'* (Castel Gandolfo, Oct. 1, 2025), available online: <https://tinyurl.com/5f44us49>