



National Tribal
AIR ASSOCIATION

January 16, 2026

Joseph Bayer
CAFE Program Division Chief
Office of Rulemaking
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. NHTSA-2025-0491-0001
Proposed Safe Affordable Fuel Efficient (SAFE) Vehicles Rule III for Model Years 2022-2031 Passenger Cars and Light Trucks

Dear Mr. Bayer:

The National Tribal Air Association (NTAA) is pleased to submit these comments on NHTSA's proposal: *Proposed Safe Affordable Fuel Efficient (SAFE) Vehicles Rule III for Model Years 2022-2031 Passenger Cars and Light Trucks* as published in the *Federal Register* on December 5, 2025, 90 Fed. Reg. 56438.

The NTAA is a member-based organization with 161 Member Tribes. The organization's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaskan Natives. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important to understand that interactions with the organization do not substitute for Nation-to-Nation consultation, which can only be achieved through direct communications between the federal government and American Indian Tribal Governments and Alaskan Natives.

The NTAA opposes the proposed rollback and overall weakening of fuel economy standards as recently proposed by your agency. Our organization has for many years been a consistent advocate for reducing emissions from mobile sources including light duty cars and trucks.¹ There are many bases for our concerns and opposition to your proposed action as highlighted in the following comments.

Many Tribal communities and tens of millions of U.S. residents breathe unhealthful concentrations of ozone. Emissions from gasoline-powered and diesel-powered motor vehicles have been, and

¹ Letter from NTAA Chair Syndi Smallwood to EPA Administrator Michael S. Regan, June 2023; Letter from NTAA Chairwoman Carol Kriebs to EPA Deputy Assistant Administrator Alejandra Nunez, July, 2021.

continue to be, primary sources of both volatile organic compounds (VOCs) and oxides of nitrogen (NOx), the requisite precursors to this tropospheric ozone. Quite simply, more fuel-efficient vehicle fleets release less VOCs and NOx resulting in lower ozone concentrations and more healthful air quality. The proposal to weaken fuel efficiency standards, if finalized, will lead to prolonged exposures to ozone and demonstrable damage to human health and the environment.

Respiratory diseases have disproportionate impacts on Tribal communities. In 2021, the CDC found that over 13% of American Indian/Alaska Native adults have asthma, and their children reported 42% more cases of asthma compared to children from the total population.² Evaporative and exhaust emissions of toxic air pollutants, including benzene, expose residents in our communities to acute and chronic air pollution. Exhaust emissions of fine particulate matter contribute to our residents' asthma and other respiratory diseases. More fuel-efficient vehicle fleets release less particulate matter resulting in lower concentrations and more healthful air quality. The proposal to weaken fuel efficiency standards, if finalized, would lead to prolonged exposures to these dangerous pollutants.

The proposed action would also contribute to extreme weather events by increasing emissions of Carbon Dioxide from the United States' transportation sector. These impacts are felt across the United States and are already dramatically altering our environment, causing more frequent and intense heat waves, more intense precipitation events, strong storms and more prolonged drought. The adverse effects of climate change are keenly, and uniquely, felt by Tribes and Alaskan Native Villages and have adverse impacts on their economies by forcing Tribal governments to divert resources to address these challenges. Tribes are seeing the effects of extreme weather through increased storm surge, erosion, flooding, prolonged droughts, wildfires, and insect pest outbreaks in their forests. Tribal peoples, however, are more deeply affected by climate change than most American citizens. The cultures of Tribes and Alaska Native Villages are rooted in the natural environment and closely integrated into the ecosystem. Many Tribal citizens hunt and fish, use native flora and fauna for medicinal and spiritual purposes, and associate their identities and histories closely with the land and water under their care. In addition, many Tribal communities are heavily dependent on fish, wildlife, and native plants for sustenance. Environmental changes cuts more deeply at the Tribal lifeways and standard of living than other sectors of society. As ecosystems are disrupted, the very survival of some Tribes as unique and distinct cultures are at risk. The loss of traditional cultural practices, due to environment-driven die-off or range shift of culturally significant flora and fauna, may prove too much to withstand on top of other external pressures faced by Tribes. The extent and magnitude of these changes depend on the amount of Carbon dioxide emissions released into the atmosphere today and in the future. The proposal to weaken fuel efficiency standards will facilitate continued excess emissions from motor vehicles and the associated acceleration of environmental changes.

The NTAA has a long history of information sharing with EPA and advocacy for reducing emissions of harmful air pollutants including the many such substances released by gasoline-powered and diesel-powered vehicles. Multiple reports, policy statements, and comment letters

² See Asthma and American Indians/Alaska Natives | HHS Office of Minority Health, *available at*: <https://minorityhealth.hhs.gov/asthma-and-american-indiansalaska-natives>

are available on NTAA's website.³ NTAA's *Status of Tribal Air Reports* (STAR), for example, documents climate change impacts on Tribal lands and people.

The NTAA appreciates this opportunity to comment on the proposed rule to roll back current fuel efficiency standards for light duty passenger vehicles and trucks. We urge you to abandon this effort and sustain the existing requirements. If you have any questions or would like additional information please contact Miranda O'Neill, NTAA Program Manager, Miranda.ONeill@nau.edu.

Respectfully,

Syndi Smallwood
Chair
National Tribal Air Association

Cc: Lee Zeldin, Administrator, U.S.EPA
Aaron Szabo, Assistant Administrator, OAR
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Elizabeth Shaw, Deputy Assistant Administrator for Management, OAR
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³ National Tribal Air Association, www.ntaatribalair.org.