

Heavy-Duty January 31, 2011

Vehicles Task

Force Partners

Air Docket

Environmental Protection Agency

EPA Docket Center, Mailcode: 6102T

1200 Pennsylvania Avenue NW, Washington, DC 20460



Docket Management Facility, M-30

U.S. Department of Transportation

West Building, Ground Floor, Rm. W12-140

1200 New Jersey Avenue SE, Washington, DC 20590



ATTN: Docket ID Nos. NHTSA-2010-0079 and EPA-HQ-OAR-2010-0162

Medium-/Heavy-duty Vehicles Fuel and Pollution Standards Rulemaking



The BlueGreen Alliance, a strategic partnership now bringing together ten major U.S. labor unions and four of America's most influential environmental organizations uniting more than 14 million members and supporters, strongly supports the Obama Administration's commitment to cutting America's oil dependence and reducing greenhouse gas (GHG) pollution by setting vehicle fuel efficiency and pollution standards at least as strong as set forth in the Nov. 30, 2010 proposed rulemaking.



The light-duty vehicle sector is poised to provide significant oil savings and pollution reductions as a result of the historic model year 2012-2016 fuel efficiency and greenhouse gas standards finalized in April 2010. Expanding this approach to medium- and heavy-duty vehicles is critical to building a comprehensive national framework for vehicle standards. These vehicles - which include delivery trucks, buses, and long-haul freight trucks - consume as much as 37 billion gallons of fuel every year and account for 20 percent of the GHG emissions from the transportation sector, although they comprise just 4 percent of all vehicles on the road. As a result, these standards represent a tremendous opportunity to lower fuel costs for truckers, cut pollution, save oil, and create jobs.

Setting the first-ever national GHG and fuel efficiency standards for medium and heavy-duty vehicles will help America lead the world in the development and deployment of a new generation of cleaner trucks. Doing so will reduce our dependence on oil, strengthen the American auto and truck manufacturing sectors, create quality jobs and significantly reduce GHG pollution.

As proposed, the standards will improve fuel efficiency between 7 and 20 percent among truck classes, resulting in 250 million fewer tons of GHG pollution and saving 500 million barrels of oil over the life of vehicles sold from 2014 to 2018. This estimated cumulative oil savings is almost as much as what America imported last year from Venezuela and Iraq.

While this will likely increase the acquisition cost of medium- and heavy-duty vehicles, the upfront cost is expected to be minimal and quickly offset by significant savings at the pump. The Notice of Proposed Rulemaking (NPRM) estimates the market cost to implement the proposed standards will be \$7.7 billion, while truckers could save \$28 billion at the pump. This means less money spent on oil, more money going back into the U.S. economy, and reduced shipping costs. Most importantly, it means more job creation to deliver an American-made cleaner truck fleet.

Developing and manufacturing cleaner vehicles and their underlying components domestically will bolster efforts to re-energize the U.S. manufacturing sector, which has shed more than a million jobs in the recent economic recession, and strengthen America's ability to compete in the global economy. According to recent analysis by the Union of Concerned Scientists, the proposed standards would create tens of thousands of jobs by 2020.

The BlueGreen Alliance, working among a unique partnership of labor and environmental movement perspectives – including the Teamsters, United Auto Workers, Sierra Club, Natural Resources Defense Council, Union of Concerned Scientists, and National Wildlife Federation - support this initial approach to setting medium- and heavy-duty vehicle standards.

The standards are a critical step in a building a strong, national vehicle standards framework and we respectfully propose the following principles be integrated into the final rule:

1) While much of the fuel efficiency improvements required by these standards will be achieved using off-the-shelf technology, we hope advanced vehicle technology is also increasingly utilized, in this and future rulemakings, to achieve further progress on fuel efficiency, oil savings, and greenhouse gas reductions to the highest degree technically and economically feasible. Standards to improve trailer design to maximize fuel savings from freight trucks should be considered for implementation beginning in 2014 along with the standards for the tractors and be incorporated into future rulemakings.

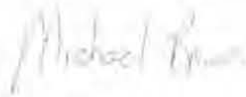
2) Complementary truck efficiency and financing programs should take into account trucking's unique market structure and accelerate the acquisition of cleaner vehicles by licensed motor carriers. These supportive measures should help minimize deferral of vehicle purchases in undercapitalized sectors such as in port trucking, which will create and sustain more quality jobs, maximize economic benefits to American vehicle and component manufacturers and expedite gains in fuel efficiency and pollution reduction.

3) The final rule, and subsequent rulemakings, should ensure that economic benefits and costs are equitably distributed to drivers and workers in the industry, not just licensed motor carriers. Further, it is critical that any new or existing programs outside of these standards to promote clean vehicle technology and vehicle acquisition include accountability mechanisms to ensure incentives for new vehicle purchase and truck retrofits deliver the highest benefit to workers and drivers.

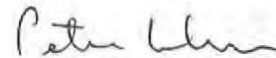
4) Given the complexity of these vehicle classes, the agencies should implement a program as part of the final rule to collect data, actual vehicle configurations sold and their performance as estimated by simulation modeling, which will provide information required to develop a full-vehicle program in the future. This should include developing and refining test cycles that more accurately reflect actual drive cycles for medium- and heavy-duty trucks.

We applaud the agencies' efforts to develop the first-ever fuel efficiency and greenhouse gas standards for medium- and heavy-duty vehicles. Working together, we can ensure the best possible outcomes for American workers, our communities, the economy and the environment.

Sincerely,



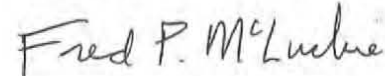
Michael Brune, Executive Director
Sierra Club



Peter Lehner, Executive Director
Natural Resources Defense Council



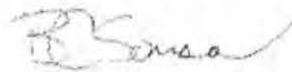
Kevin Knobloch, President
Union of Concerned Scientists



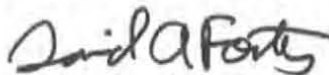
Fred McLuckie, Legislative Director
International Brotherhood of Teamsters



Jim Lyon, Vice President for Conservation Policy
National Wildlife Federation



Barbara Somsom, Legislative Director
United Auto Workers



David Foster, Executive Director
BlueGreen Alliance





INDUSTRY EXPRESSES BROAD BASED SUPPORT FOR STRONG GHG AND FUEL EFFICIENCY STANDARDS FOR TRUCKS AND BUSES

In May 2010, a number of major truck manufacturers sent letters to EPA Administrator Jackson and DOT Secretary LaHood relaying support for strong greenhouse gas and fuel efficiency standards for medium- and heavy-duty vehicles. Signees of the letters included: Chrysler; Cummins; Daimler; Ford; General Motors; Mack; Navistar; and Volvo.

These leading truck manufacturers all stated that they, “recognize[s] the benefits for the country of a National Program to address greenhouse gases (GHGs) and fuel efficiency from medium and heavy-duty trucks and buses” and “support[s] the adoption of a uniform National Program covering these vehicles and welcome[s] this opportunity to be a partner in advancing that goal.”

The signees also “...support a National Program comprised of GHG and fuel efficiency standards that is consistent with the following principles...[s]ignificantly reduces CO₂ emissions and achieves significant fuel savings for the Nation” and “incentivize the early introduction of advanced technologies.”

EPA website: <http://www.epa.gov/otaq/climate/regulations.htm#1-2>

