American Council for an Energy-Efficient Economy ● Natural Resources Defense Council ● Northeast States for Coordinated Air Use Management - Northeast States Center for a Clean Air Future ● Union of Concerned Scientists

January 21, 2010

The Honorable Lisa Jackson
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Reducing Greenhouse Gas Emissions from Heavy-Duty Vehicles

Dear Administrator Jackson:

Reducing greenhouse gas emissions from the U.S. transportation sector is a critical part of confronting the threat of climate change. Under your leadership, EPA has already proposed the nation's first greenhouse gas tailpipe emission standards for automobiles. We are encouraged that the EPA is now working on standards for heavy-duty vehicles, which account for nearly 20 percent of the total emissions from the U.S. transportation sector.

EPA should set strong greenhouse gas standards for all heavy-duty vehicle classes as soon as possible**.** Due to the slow turnover of the heavy-duty fleet, it will take decades for the effect of any new standards to be fully realized. Therefore, it is critical that EPA move forward with standards for all classes of heavy-duty vehicles (classes 2B-8). Further, the new standards should begin to phase in no later than four years after the final rule is promulgated.

Strong standards will encourage the use of technologies that can cut fuel costs, save oil, create jobs, and reduce greenhouse gas emissions. We recognize that there is a diversity of applications, sizes, and weight classes among heavy-duty vehicles. A well-designed regulatory structure will acknowledge these differences as well as the real opportunities for emission reductions available from each vehicle segment. Using existing technology and technology currently in development, new Class 7 and 8 tractor-trailers could reduce greenhouse gas emissions by at least 40 percent in the 2015 timeframe below model year 2010 levels. Other heavy-duty vehicle classes can also make substantial reductions based on a combination of currently available technology and forthcoming technology improvements and should be required to do so.

Addressing global climate change will require major reductions in greenhouse gas emissions from the U.S. transportation sector. We are encouraged by the progress that EPA has already made on this issue and look forward to working with you to develop standards for the second-largest source of transportation emissions, class 2B through

class 8 heavy-duty vehicles. A well-designed greenhouse gas standard for heavy-duty vehicles can achieve significant emission reductions, while providing an economic benefit to fleets, truckers, and manufacturers.

Sincerely,

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CC: Margo Oge, Director of the Office of Transportation and Air Quality