NESCAUM
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Northeast States for Coordinated Air Use Management
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Arthur N. Marin, Executive Director

January 31, 2011

U.S. Environmental Protection Agency
Air and Radiation Docket
EPA Docket Center (EPA/DC), Mail Code: 6102T
1200 Pennsylvania Avenue NW
Washington, DC 20460

U.S. Department of Transportation
Docket Management Facility, M–30
West Building, Ground Floor, Rm. W12–140
1200 New Jersey Avenue SE
Washington, DC 20590

Attention: Docket ID Nos. NHTSA–2010–0079 and EPA–HQ–OAR–2010–0162.

Re: Proposed Joint Rulemaking to Establish GHG Emissions and CAFE Standards for Medium- and Heavy-Duty Vehicles

Dear Administrator Jackson and Secretary LaHood:

The Northeast States for Coordinated Air Use Management (NESCAUM) is pleased to provide comments on EPA and NHTSA's Proposed Rulemaking for medium- and heavy-duty vehicle greenhouse gas (GHG) emission and fuel efficiency standards. NESCAUM is an association of the air pollution control programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our organization strongly supports efforts to reduce motor vehicle GHG emissions and fuel consumption, and we commend the agencies on this important step toward establishing standards for medium- and heavy-duty vehicles.

We strongly support this federal effort to develop fuel economy and GHG standards for medium- and heavy-duty engines and vehicles. Improving the fuel economy of our nation's trucks will provide long-lasting benefits to consumers, businesses, and the economy as a whole, by reducing the costs for transporting goods and for the many other services that utility and vocational vehicles provide. By eliminating 250 million tons of greenhouse gas emissions, the rules will play an important role in minimizing the detrimental economic and environmental impacts of global warming. In addition, the rules will substantially reduce our nation's dependence on foreign oil, cutting petroleum use by 500 million barrels over the life of the affected vehicles.

Because of these important economic, environmental, and security benefits, we encourage the agencies to adopt the most stringent standards that are both technically and economically

feasible. To that end, we recommend strengthening the proposed standards for pickups, vans, and vocational vehicles, and finalizing the rules for all vehicle and engine types at the earliest possible date. In addition, we ask that the agencies commit to an accelerated effort to develop complementary standards for commercial trailers. Our recommendations on each of these issues are explained in detail below.

1. Stringency of Proposed Standards

Vocational Vehicles

The proposed standards for vocational trucks consider only the benefits from engine efficiency improvements and low-rolling-resistance tires. We urge the agencies to strengthen the standards for this vehicle category to reflect the potential for other viable technologies, such as improved aerodynamics, mass reduction, advanced transmissions, and hybridization. A 2010 National Academy of Sciences (NAS) study found that fuel consumption could be reduced by up to 50% for some types of vocational vehicles using a combination of these advanced technologies.[1] Moreover, Pike Research projects medium- and heavy-duty hybrid sales of 300,000 vehicles annually, equal to about 7 percent of total projected sales, by 2015.[2]

The proposed rule would require a 7 to 10 percent reduction in GHG emissions from vocational trucks by 2017. However, assuming modest gains from hybridization and other improvements consistent with the NAS study, we believe that substantial additional savings will be achievable in the same timeframe. We urge the agencies to require vocational trucks to reduce emissions by at least an additional 5 percent for light and medium vehicles, and an additional 3 percent for heavy vehicles by 2017 in order to promote the production of hybrids and the faster uptake of advanced technologies.

Heavy-Duty Pickup Trucks and Vans

The agencies' proposal to reduce fuel consumption by 10% from gasoline vehicles and 15% from diesel vehicles by 2018 can and should be strengthened in order to maximize the benefits of improved fuel economy and reduced GHG emissions in this sector, using commercially viable technologies. We support the agencies' approach to require full vehicle emissions and fuel consumption testing for the class 2b and 3 vehicles. However, based on the findings of the NAS study, we believe the potential reduction for this sector could be greater than required under the proposed rule. The NAS study found that a 30 percent reduction could be achieved without hybridization in Class 2b trucks between 2015 and 2020. We encourage the agencies to consider more stringent standards for this class of vehicles for the 2018 timeframe.

[1] National Academy of Sciences, 2010. *Technologies and Approaches to Reducing the Fuel Consumption of Medium- and Heavy-Duty Vehicles.*

[2] Pike Research http://greenbigtruck.com/2010/06/pike-research-forecasts-300000-medium-heavy-duty-hybrids-by-2015

AEO 2010[3] projects that heavy-duty pickups and vans will already achieve virtually the same efficiency in the Reference Case as the proposed standard requires, because these vehicles will take advantage of the technologies brought to market by the 2012-2016 light-duty rule. We agree with the assumption in AEO that the technologies used to comply with the 2012 to 2016 light duty vehicle standards can be used to comply with the proposed standards for heavy-duty pickup trucks and vans. Accordingly, we urge the agencies to accelerate the phase-in of the gasoline and diesel standards for this category to achieve the proposed 2018 requirements by 2016.

2. Standards for Commercial Trailers

The proposed standards for heavy-duty combination tractors represent an important step in reducing emissions from Class 7 and Class 8 vehicles. These standards would reduce combination tractor fuel consumption and greenhouse gas emissions by up to 20 percent by 2017 compared to a 2010 baseline. This level of reduction is technically feasible using a combination of commercially available engine and vehicle technologies and with the realization of additional improvements in efficiency from exhaust aftertreatment systems or other approaches. The proposed standards will not require the introduction of advanced technologies such as bottoming cycle or hybridization.

It is our view, however, that the proposed rules should be complemented by the establishment of GHG and fuel economy standards for trailers, which have not been included in the proposal. In 2009, under the auspices of the Northeast States Center for a Clean Air Future (NESCCAF) NESCAUM published a comprehensive study on the technical feasibility and costs associated with reducing heavy-duty long haul truck fuel consumption and greenhouse gas emissions.[4] Our study found that a 40 percent reduction in fuel consumption and emissions is achievable in the 2018 timeframe for combination tractor-trailers without exceeding current limits on truck weight and length. We found that the reductions could be achieved through the use of engine technologies, transmission improvements, improvements in tractor and trailer aerodynamic drag and tire rolling resistance, and other strategies. We wish to emphasize that significant emissions reductions are achievable through the use of aerodynamic drag improvements on trailers. We attach our study to these comments for submittal into the rulemaking docket.

Because it is important to obtain improvements from the full vehicle in order to maximize the potential emissions and fuel consumption reductions from these heavy trucks, we encourage the agencies to propose regulations for trailers at the earliest possible date.

[3] Energy Information Agency, *Annual Energy Outlook 2010*

[4] NESCCAF, 2009. *Reducing Heavy-Duty Long Haul Combination Truck Fuel Consumption and CO_2 Emissions.* http://www.nescaum.org/documents/heavy-duty-truck-ghg_report_final-200910.pdf

3. Timeline for Finalization of Standards

All eight NESCAUM states and numerous others throughout the US have established aggressive GHG reduction targets in climate action plans or legislation; many call for reductions of at least 75 percent by 2050 with intermediate goals for 2020. In order to meet these goals, states have established or adopted a number of programs, including programs to reduce power plant emissions, adoption of the California light duty vehicle GHG standards, and the Zero Emission Vehicle program. In addition, states are undertaking measures to reduce truck, locomotive, and passenger car idling; to reduce vehicle miles traveled; to establish infrastructure and incentives for zero emission vehicles; and to evaluate other strategies for reducing GHG emissions from mobile and stationary sources.

The timely finalization of the proposed medium- and heavy-duty standards is extremely important since states are reliant on the federal government for GHG reductions from new medium- and heavy- duty trucks. To underscore this point, nine governors wrote a letter to President Obama in October 2010 urging him to establish stringent fuel consumption and GHG emissions standards for medium- and heavy-duty vehicles in addition to light duty vehicles.[5]

In summary, we urge the agencies to finalize the proposed rules by July 2011, incorporating the changes we propose in these comments. NESCAUM looks forward to working with EPA and NHTSA in the refinement and finalization of the proposed rules. If you have any questions, or if you would like more information on efforts by our states, please contact Matt Solomon of my staff at: 617-259-2029, email: msolomon@nescaum.org.

Sincerely,

Arthur N. Marin
Executive Director

Attachments: NESCCAF/ICCT 2009 HDV GHG Study
October 2010 Governors' Letter to President Obama

Cc: NESCAUM Directors

[5] Governors' letter to President Obama, October 1, 2010.


New York


Maine


Maryland


Massachusetts


New Mexico


Oregon


Pennsylvania


Vermont


Washington

October 1, 2010

President Barack Obama
White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Obama,

On behalf of the millions of citizens in our states, we thank you for your leadership in proposing to reduce our dependence on foreign oil by increasing fuel efficiency for new cars and trucks. We are pleased that the Department of Transportation (through the National Highway Traffic Safety Administration, NHTSA) and the Environmental Protection Agency (EPA) are releasing a proposal that meets your call from last May for improved fuel efficiency and stronger greenhouse gas pollution standards for new cars and trucks.

We write to let you know that we support this action for many reasons, but perhaps most importantly, by employing American ingenuity we will have more efficient vehicles that will reduce unnecessary and wasteful spending at the pump, keeping money in our state and local economies. The US currently sends nearly $1 billion overseas for oil every day; money we could use more productively at home.

Our states are among the 14 states that have adopted cleaner car standards based on the pioneering California rules -- and consumers are embracing the vehicles. Building on California's independent authority and technical expertise, our alliance of states remains committed to support cars that are technologically advanced, use less oil and run cleaner. We believe that reducing our demand for oil will also be good for the environment, as it will reduce the risk of damage to our, oceans, our coasts and sensitive land.

Today, the technology exists to reduce fuel use and pollution from all types of vehicles. As your administration develops these proposals, we urge you to set ambitious new standards for passenger vehicles. Some hybrids today already get over 50 miles per gallon and are being labeled "conventional." We have seen the automakers meet goals time and again and we are confident that technological improvements, including the plug-in hybrids and pure electric vehicles that they are rolling out, will increase efficiency and affordability further and will make 60 miles per gallon commonplace. We urge you to help realize this by setting a joint EPA/NHTSA standard of 60 mpg by 2025.

We also look forward to EPA and NHTSA's proposed fuel economy and greenhouse gas standards for medium- and heavy-duty trucks. These next clean vehicle standards must also put money back in consumers' pockets by increasing fuel efficiency of long-haul trucks by at least 35 percent by 2017. As the cost of shipping decreases, necessities will become more affordable for struggling families around the US. Taken together these standards would reduce the country's oil consumption by more than 45 billion gallons per year by 2030—more than one and a half times the amount we currently import from the Persian Gulf.

In the past, government and industry were at odds. But we are glad to say that the carmakers are supporting clean car standards because they know that Americans will increasingly demand these cleaner cars. Today, there are fewer and fewer parties on the "other side" of this issue.

On behalf of our citizens, we thank you and are pleased that you share our vision of pioneering technology that makes travel more affordable, creates new jobs, protects the environment, and enhances our national security. We thank you and your agencies for leadership on this important issue and look forward to partnering to improve our economy, environment, and leadership in the world.

Sincerely,

David A. Paterson

Governor David A. Paterson
New York

John Baldacci

Governor John Baldacci
Maine

Governor Martin O'Malley
Maryland

Governor Deval Patrick
Massachusetts

Governor Bill Richardson
New Mexico

Theodore R Kulongoski

Governor Theodore R. Kulongoski
Oregon

Edward G. Rendell

Governor Edward G. Rendell
Pennsylvania

Governor James H. Douglas
Vermont

Chris Gregoire

Governor Christine O. Gregoire
Washington