

January 5, 2015

The Honorable Gina McCarthy
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

The Honorable David Friedman
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Administrator McCarthy and Acting Administrator Friedman:

The Northeast States for Coordinated Air Use Management (NESCAUM) commends EPA and NHTSA for the successful implementation of the Phase 1 fuel economy and greenhouse gas (GHG) emissions standards for engines, semi tractors, and vocational vehicles. NESCAUM is the association of state air pollution control programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our states have committed to aggressive GHG reduction targets and have implemented innovative programs to reduce emissions and fuel consumption from a range of key sources and sectors. Given federal limits on states' authority to set emission standards for this source, effective national controls for heavy-duty vehicles are critical to our members. As your agencies prepare for the Phase 2 rulemaking, we urge you to take advantage of the full suite of applicable technologies and set strong standards that will reverse the current upward trajectory of emissions and fuel consumption in this sector.

Your agencies have put the nation's heavy-duty vehicle fleet on a path toward lower oil consumption and reduced GHG emissions through implementation of the historic Phase 1 emissions and fuel economy standards. We urge you to build on that progress by including an option in the Notice of Proposed Rulemaking for the Phase 2 standards that will reduce fuel consumption from new trucks by at least 40 percent by 2025 relative to 2010. These reductions appear to be achievable, and will be needed to help our states to meet their long-term GHG reduction goals. Moreover, they will benefit small businesses and consumers by helping to reduce the cost of goods movement.

Manufacturers can already utilize a host of existing technologies to further reduce heavy-duty vehicle emissions through improvements to engines and trailers. In addition, advanced technologies demonstrated through the Department of Energy's "SuperTruck" program will enable significant additional reductions in the Phase 2 timeframe. The agencies should consider all options to provide manufacturers with maximum flexibility to cost-effectively achieve the desired reductions. Moreover, the agencies should ensure that the regulations address full-system impacts and not just individual components. To achieve this, the agencies should establish performance standards for full vehicles along with complementary standards for engines and trailers; and the agencies should ensure that certification test protocols reflect real-world vehicle-engine configurations.

The Phase 2 rulemaking represents a critical opportunity to put the nation's heavy-duty vehicle fleet on a path toward sustainability. We urge you to take full advantage of this chance to reduce carbon pollution and enhance the nation's energy and economic security. Further, EPA should evaluate opportunities to reduce nitrogen oxide (NOx) emissions from this sector through the application of technologies and systems that increase fuel economy and reduce GHGs. NOx from heavy-duty engines significantly contribute to ozone formation in our states, which remains a concern with the proposed new national ambient air quality standards for this pollutant. We look forward to continuing to engage throughout the rulemaking process. Thank you for your leadership and commitment to improve the efficiency of and reduce GHG emissions from the nation's heavy-duty vehicle fleet.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur N. Marin".

Arthur N. Marin
Executive Director

Copy: Mary Nichols, Chairman, California Air Resources Board
Chris Grundler, Director, USEPA OTAQ
NESCAUM Directors