

NESCAUM and NACAA Comments

November 18, 2010 Public Hearing – Cambridge, MA

Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) proposed *Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles*

Good morning, my name is Coralie Cooper. On behalf of the Northeast States for Coordinated Air Use Management (NESCAUM) and the National Association of Clean Air Agencies (NACAA), I am providing comments today regarding EPA and NHTSA's Notice of Proposed Rulemaking for medium- and heavy-duty vehicle greenhouse gas emission and fuel efficiency standards. In addition to today's testimony, NESCAUM and NACAA intend to provide detailed written comments prior to the submittal deadline.

NESCAUM and NACAA applaud this important step towards reducing transportation-related greenhouse gas emissions. Medium and heavy trucks emit twenty percent of transportation greenhouse gases. The proposed rule, once implemented, will reduce medium- and heavy-duty vehicle greenhouse gas emissions by 246 million tons over the life of the vehicles affected by the regulation. The rule will also help us as a nation reduce our dependence on petroleum by lowering oil consumption by more than 20 billion gallons. This reduction will come at a net cost savings of 27 to 41 billion dollars for industry – mainly from avoided fuel costs.

We support the proposed standards and the inclusion of all medium- and heavy-duty vehicle types in the regulation. We will make two main points in our testimony today:

- 1) Given the importance of this rule, we ask the agencies to finalize the standards by July 2011 as has been outlined in the regulatory documents; and
- 2) We ask the agencies to consider increasing the stringency of the standards in each of the three vehicle categories included in the rule: tractor trailers, vocational vehicles, and class 2b and 3 vehicles.

On the need for finalizing the standards by July, 2011, a number of states around the country have established aggressive greenhouse gas reduction targets in climate action plans that call for an 80 percent reduction in greenhouse gas emissions 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 greenhouse gas standards, and the Zero Emission Vehicle program. In addition, states are undertaking measures to reduce truck, locomotive, and passenger car idling, reduce vehicle miles travelled, establish an infrastructure and incentives for zero emission vehicles, and are evaluating other strategies to reduce mobile and stationary source greenhouse gas emissions.

The timely finalization of the EPA and NHTSA proposal on medium and heavy duty GHG and fuel consumption standards is extremely important since states are reliant on the federal government for reductions in new medium- and heavy-truck greenhouse gas emissions. To underscore this point, nine governors wrote a letter to the President in October urging him to establish stringent fuel consumption and greenhouse gas emissions standards for medium- and heavy-duty vehicles in addition to light duty vehicles. I am submitting a copy of this letter with today's testimony.

Our comments on the stringency of the standards are as follows:

Tractor trailers:

The proposed standards for tractor trailers represent an important step in reducing their emissions. The agencies have proposed standards that would reduce tractor trailer fuel consumption and greenhouse gas emissions 20 percent by 2017. 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 tractor trailer proposal could be improved by establishing standards for trailers – which have not 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. Our study found that a 40 percent reduction in fuel consumption and emissions is achievable in the 2018 timeframe for tractor trailers without exceeding current limits on truck weight and length. We also 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 a significant percentage of the emissions reductions are achievable through the use of aerodynamic drag improvements on trailers. We will be submitting our study to the rulemaking docket as part of our written comments.

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, NESCAUM and NACAA encourage the agencies to propose regulations for trailers as soon as possible. Including the full vehicle in the standards will not only result in additional reductions for tractor trailers, but will also ensure that technologies that are not solely specific to the engine, tractor, or trailer – such as closing the gap between the tractor and trailer – will be available to manufacturers to meet the standards.

Medium- and Heavy-Duty Vocational Vehicles

The agencies proposal for medium- and heavy-duty vocational vehicles is technically feasible in the timeframe proposed, but further improvements could be realized in this sector as well. A 2010 National Academy of Sciences study on technologies to reduce medium- and heavy-duty truck fuel consumption found that 38 to 50 percent of some vocational vehicle fuel consumption – bucket trucks for example – could be reduced with hybridization, engine improvements, weight reduction, and transmission improvements. Without hybridization, the Academy’s study found

that approximately 18 percent of fuel consumption can be reduced in the 2015 to 2020 timeframe. In contrast, the EPA/NHTSA proposal requires a 7 to 10 percent reduction in the same timeframe for these types of vehicles. In the EPA/NHTSA proposal, a number of technologies can be used to earn credits through the advanced technology and innovative provisions, but the standards will not require the use of these technologies. NESCAUM and NACAA urge the agencies to establish more stringent standards in the final rulemaking for this class of vehicles that will require the introduction of these technologies.

Class 2b and 3 Vehicles

We support the agencies' approach to require full vehicle emissions and fuel consumption testing for the class 2b and 3 vehicles. Furthermore, we concur with the assumption that technologies used to comply with the 2012 to 2016 light duty vehicle standards will be used to comply with the 2b and 3 category standards. The agencies have proposed a 15 percent reduction in fuel consumption and emissions for diesel vehicles and a 10 percent reduction for gasoline vehicles in 2017. Based on the findings of the National Academy of Sciences 2009 study, we believe the potential reduction for this sector could be greater. The Academy 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 2017 timeframe.

In summary, we urge the agencies again to finalize the proposed rule by July, 2011 with the suggested changes we have outlined above.

We thank the EPA and NHTSA for the opportunity to comment on this proposal and look forward to assisting the agencies in the development of the final rule.