

March 25, 2011

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Light-Duty Vehicle Emission Standards

Dear Administrator Jackson:

I am writing on behalf of the environmental agencies in the Northeast to express our strong support for EPA developing a robust federal Tier 3 Light-Duty Vehicle program as soon as possible. The Northeast States for Coordinated Air Use Management (NESCAUM) is an association of the air pollution control programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Despite significant progress in achieving cleaner air, many states throughout the US face the continuing challenge of attaining and maintaining current and forthcoming national ambient air quality standards.

NESCAUM and our member states are committed to cleaner air and low-emission vehicles, as evidenced by the adoption of the California Low-Emission Vehicle (LEV) program in seven of our member states. While a Tier 3 rule would not directly affect emissions from new vehicles sold in these states, it will improve air quality in the Northeast by reducing pollution transport from neighboring regions and ensuring that out-of-state vehicles operating within our region have comparably low emission characteristics. In addition, to the extent that new federal rules are harmonized with the California program, it will facilitate compliance by automobile manufacturers.

Strong federal emission standards for light-duty vehicles remain among the most important strategies for protecting public health through the reduction of particulate matter (PM), nitrogen oxides (NO_x) and non-methane organic gases (NMOG). Moreover, motor vehicle standards have driven advancements in cost-effective emission control technologies, to the benefit of industry and the public alike. While Tier 2 vehicles are significantly cleaner than their predecessors, there is much more potential to be realized in reducing the adverse effects of motor vehicle pollution on public health and the environment. In addition, projected increases in air emissions resulting from implementation of the federal Renewable Fuels Standard (RFS2) reinforce the need to strengthen emission requirements for light-duty vehicles.

We believe that it is feasible and appropriate to set federal requirements for exhaust and evaporative emissions that are comparably stringent to those proposed by the California Air Resources Board (CARB) in their next low-emission vehicle regulation (LEV III). If changes to fuel specifications are needed to enable manufacturers to meet these more stringent standards, EPA should revise its fuel requirements accordingly. Specifically, we request that EPA address the following issues as part of a Tier 3 program:

- **Exhaust emissions:** Fleet average requirements should be set at levels consistent with CARB's LEV III requirements for NO_x, PM, and NMOG.
- **Evaporative emissions:** Vehicles should be required to achieve evaporative emissions levels consistent with the CARB zero-evaporative emissions standard.

- **Certification fuel:** Given the prevalence of ethanol as a blended component of motor gasoline, and EPA's recent decision to allow gasoline blends of up to 15 percent ethanol by volume, EPA should require the use of a gasoline-ethanol blend in place of indolene as a certification fuel to more accurately reflect emissions from in-use vehicles.
- **Fuel sulfur:** EPA should require an average motor gasoline sulfur concentration of 10 parts per million (ppm). This will enable the use of the most advanced catalysts, thereby facilitating auto manufacturers' efforts to achieve the exhaust emissions levels described above. It will also provide important near-term air quality benefits by improving catalyst performance in the existing vehicle fleet.
- **Fuel volatility:** EPA should set fuel volatility requirements as needed to enable the use of zero-evaporative emissions technology.

Not only will these measures provide critical benefits for ambient air quality and public health, they will also promote economic growth and create jobs throughout the U.S. According to the Manufacturers of Emission Controls Association, the emission control technology industry provides 65,000 domestic jobs and accounted for \$12 billion in economic activity in the U.S. in 2010.¹ Moreover, emissions standards have been shown to be very cost effective in terms of public health outcomes. As you are well aware, a recent EPA study² found that the health benefits resulting from implementation of the 1990 Clean Air Act Amendments exceed costs by a factor of three to one under the most conservative assumptions; under assumptions considered most likely, benefits exceed costs by a factor of 30 to 1.

In summary, we urge EPA to: (1) move expeditiously to set stringent new standards for exhaust and evaporative emissions from cars and light trucks; (2) revise motor gasoline requirements if needed to facilitate compliance with these new standards; and (3) require the use of a gasoline-ethanol blend in place of indolene as a certification fuel. We believe that new federal standards consistent with the requirements of CARB's LEV III program are achievable and appropriate in the 2022 timeframe. These standards can be met using commercially available technologies, and at a cost that will be recovered many times over through reductions in morbidity and mortality throughout the nation.

We look forward to supporting your work to ensure that the new vehicle standards are strong, achievable, and cost-effective. If you have any questions, please contact me or Matt Solomon of my staff at 617-259-2029 or msolomon@nescaum.org.

Sincerely,



Arthur N. Marin
Executive Director

Cc: Margo Oge, Director, US EPA Office of Transportation and Air Quality
NESCAUM Directors

¹ Manufacturers of Emission Controls Association. *MECA Highlights Economic Benefits of Mobile Source Emission Control Industry*. Press release, March 11, 2011. (<http://www.meca.org>)

² U.S. EPA, 2011. *Benefits and Costs of the Clean Air Act: Second Prospective Study – 1990 to 2020*.