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Clean Air Watch • Coalition of Labor Union Women, Chicago Chapter
Environment America • Environmental Defense Fund • Environmental Integrity Project • Galveston - Houston Association for Smog Prevention (GHASP) • Health Professionals for Clean Air • National Association of Clean Air Agencies • Natural Resources Defense Council • Northeast States for Coordinated Air Use Management
Respiratory Health Association of Metropolitan Chicago • Richter Foundation
Southern Alliance for Clean Energy • Southern Environmental Law Center • Union of Concerned Scientists • Valley Watch, Inc.

February 6, 2009

Honorable Lisa Jackson
Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Jackson,

Congratulations on your confirmation as the next Environmental Protection Agency Administrator. We wish you the greatest of success and pledge to work closely with you and your staff to meet the nation's air pollution needs.

We write to you today to reiterate our strong support for implementing the 2007 Heavy-Duty Highway Diesel Rule. This rule, which was finalized by EPA Administrator Carol M. Browner in 2000 and re-affirmed by EPA Administrator Christine Todd Whitman in 2001, includes a series of fuel and engine emission standards that are cost-effective, achievable and will accomplish significant, necessary pollution reductions.

Recently, one manufacturer has suggested that the final NO_x standard, scheduled to be implemented in 2010, should be delayed. We reiterate our longstanding view that these standards should be implemented on time, with no delay. Delay of these standards would both set back vital human health protections and reward manufacturers who failed to comply with the deadlines.

The 2010 standards are feasible and cost-effective

Many manufacturers are prepared and ready to meet the 2010 emissions standards for heavy-duty highway engines. Manufacturers are primarily using selective catalytic reduction (SCR) technology to make the required emissions reductions and their preparation indicates that the standards are indeed feasible. In addition, White House OMB and EPA studies have concluded that implementing this rule fully and on time would be one of the most cost-effective steps of the past several decades of pollution control. For every dollar spent to implement this rule, the nation will receive more than seventeen dollars in health and other benefits.

NOx emissions reductions are needed on time

The 2010 standards for heavy-duty highway engines will provide significant emissions reductions—reductions that are critical around the nation, especially in ozone and PM2.5 nonattainment areas. EPA estimates that in 2010, annual NOx emissions from the heavy-duty highway sector will be reduced by about 400,000 tons as a result of these rules. And by 2030, NOx reductions will be about 2.4 million tons, a 90% reduction from the baseline.¹ States across the nation are depending on these reductions to protect human health and meet air quality planning obligations.

Manufacturers who have lagged behind must not be rewarded

Most engine manufacturers have been working hard since the rule was finalized in 2000 to develop engines that meet the more stringent 2010 standards. As Mack's chief executive officer told Transport Topics, delay of the standards "...would create an uneven playing field...and would penalize those of us who have been diligent."² Further, Volvo has characterized "recent efforts to seek 11th-hour changes as misleading and unnecessary."³

The signatories below strongly support timely implementation of the 2010 standards. The emissions reductions are vital to protect human health, the standards are feasible and cost-effective, and most manufacturers are on track to deliver cleaner engines on time.

We sincerely appreciate your leadership in protecting human health and the environment, and wish you great success as EPA Administrator.

Sincerely,

Kathy Andria
President
American Bottom Conservancy

¹ EPA, 2007 Heavy-duty Highway Rule, RIA, Chapter 2, page 2-119.

² <http://www.tnews.com/articles/basetemplate.aspx?storyid=20939>

³ http://www.volvo.com/trucks/na/en-us/news_and_events/news_releases/NewsItemPage.htm?ItemId=54972&sl=en-gb

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