

October 29, 2010

Lisa P. Jackson Administrator U.S. Environmental Protection Agency Mail Code 2822T 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Re. Docket No. EPA-HQ-OAR-2010-07991

Dear Administrator Jackson,

As leaders of large U.S. businesses, we are writing to voice our strong support for a fleetwide average standard of at least 60 mpg for new cars and light trucks (light duty vehicles) and  $143 \text{ g CO}_2$ /mile in 2025. Since light-duty vehicles account for 41% of all US oil consumption, and are responsible for nearly 60% of all mobile source GHGs, the upcoming rulemaking represents an important opportunity to enhance energy security, provide protection from volatile oil price spikes, contribute to economic growth, and reduce global warming emissions.

Strong standards will allow us to reduce our dependency on foreign oil. More than two-thirds of US gasoline is derived from foreign oil.<sup>2</sup> According to EPA's and NHTSA's Notice of Intent (NOI), <sup>3</sup> a 62 mpg standard would result in a lifetime fuel reduction for model year 2025 vehicles alone of 1.3 billion barrels of fuel, a significant reduction considering that the U.S. consumed about 3.28 billion barrels of gasoline in 2009.<sup>4</sup> Given that the demand for oil is expected to outweigh production by the 2030s,<sup>5</sup> it is imperative that we act now.

Fleetwide average standards of at least 60 mpg by 2025 will also save consumers money and promote investment in the U.S. economy. Even during the recession of 2009, our country spent about \$320 billion on gasoline, and prices are likely to climb in the long run. The NOI estimates that a 62 mpg fleetwide average standard

<sup>&</sup>lt;sup>1</sup> These comments are submitted for consideration by both EPA and NHTSA.

<sup>&</sup>lt;sup>2</sup> http://www.eia.gov/energyexplained/index.cfm?page=gasoline\_use

<sup>&</sup>lt;sup>3</sup> Notice of Upcoming Joint Ruelmaking to Establish 2017 and Later Model Year Light Duty Vehicle GHG Emissions and CAFE standards, signed September 30, 2010.

<sup>&</sup>lt;sup>4</sup> In 2009, the U.S. consumed about 3.28 billion barrels of gasoline. http://www.eia.doe.gov/ask/gasoline\_faqs.asp#local\_station

<sup>&</sup>lt;sup>5</sup> See *The Joint Operating Environment 2010*, U.S. Joint Forces command, Feb. 2010 www.jfcom.mil

would save consumers between \$5,700 and \$7,400 per model year 2025 vehicle.<sup>6</sup> Every dollar saved on gasoline represents economic growth for our businesses and the economy as a whole. Implementing strong fuel economy standards will save consumers money, which they can invest in goods and services inside our economy, and will protect jobs in manufacturing, agriculture, retail, and services, while boosting innovation in high-tech, clean-tech, and renewable energy firms.

As successful American businesses, we know the importance of recognizing and seizing opportunities. This rulemaking is a rare opportunity to strengthen our economy, save consumers money, create jobs, reduce our dependence on oil, and increase our economic security. We urge the adoption of fleetwide average fuel economy standards of at least 60 mpg and GHG standards of 143 g  $\rm CO_2/mile$  by 2025.

Sincerely,

Mindy S. Lubber

On behalf of Business for Innovative Climate and Energy Policy [BICEP] \* President, Ceres

cc: David L. Strickland, Administrator, National Highway Traffic Safety Administration

Carol Browner, Assistant to the President for Energy and Climate Change Gary Guzy, Deputy Director and General Counsel, White House Council on Environmental Quality

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<sup>\*</sup>BICEP members include Nike, eBay, Starbucks, Stonyfield Farm, the Outdoor Industry Association, Levi Strauss & Co., Best Buy, Jones Lang Lasalle, Seventh Generation, Ben & Jerry's, Aspen Skiing Company, Gap, Inc. Timberland, Clif Bar & Symantec.

<sup>&</sup>lt;sup>6</sup> NOI, Table 2.