

January 31, 2011

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-2010-01621

Dear Administrator Jackson,

As leaders of large U.S. businesses, we are writing to voice our strong support of EPA and NHTSA's efforts to regulate the medium- and heavy-duty truck sector. Strict standards will save companies money, create jobs, promote energy security and reduce climate risk.

EPA and NHTSA are to be commended for the proposals under consideration, but by using existing and emerging technologies, we could realize even greater benefits in terms of economic growth and oil savings. We thus urge EPA and NHTSA to take into account all available technologies across the vehicle in setting standards, and to require a 35% reduction in fuel use by long-haul trucks pulling van trailers by 2017. We also urge the agencies to move aggressively to set standards for trailers for model year 2014, which will result in significant overall fuel savings for combination tractors.

Such standards would be important drivers of job creation and economic growth. For example, in a joint report,² the Union of Concerned Scientists and CALSTART concluded that a 38% reduction in truck fuel use would result in the creation of 124,000 new jobs by 2030, in every state.³

Stricter standards will ultimately save businesses money, since advanced fuel efficient trucks will more than pay for themselves over a typical ownership period. The UCS/CALSTART report concluded that these benefits would accrue to the

¹ These comments are submitted for consideration by both EPA and NHTSA.

² "Delivering Jobs; The Economic Costs and Benefits of Improving the Fuel Economy of Heavy-Duty Vehicles," UCS and CalSTART, July 2010
³ Id. At 5.

greater economy; as operating costs come down due to more fuel efficient trucks, business owners and consumers could invest that money in goods and services throughout the economy. According to the report, under stricter standards GDP would expand by \$10 billion by 2030.⁴

Strict standards are also critical to national energy security. We are increasingly dependent on trucking, so need to minimize our vulnerability to the rising price of fuel. Standards requiring the use of existing and emerging technologies would significantly reduce our dependence on oil. According to a UCS report, cutting fuel use using existing and emerging technologies would save a total of 100 billion gallons of fuel from 2010-2030.⁵

Finally, companies in a variety of sectors are increasingly interested in tracking Scope 3 emissions, including GHG emissions associated with transportation and freight movement, as part of their publicly disclosed GHG assessment. Thus, a growing number of companies support policies such as strict truck standards that would help them achieve their own GHG emission reduction goals as well as save money.

In sum, we urge EPA and NHTSA to require the reduction of fuel use from long-haul trucks pulling van trailers by 35% by 2017. Standards for all other trucks should be set based on the technologies available to improve fuel economy across the entire vehicle. Such standards would help get our economy back on track by creating jobs and saving businesses money, as well as promoting energy security and reducing climate risk.

Thank you for your consideration of our comments.

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

Gary Guzy, Deputy Director and General Counsel, White House Council on Environmental Quality

⁵ "Climate 2030," UCS; Cleetus, Clemmer and Friedman 2009.

⁴ "Delivering Jobs; The Economic Costs and Benefits of Improving the Fuel Economy of Heavy-Duty Vehicles," Union of Concerned Scientists, CALSTART, July 2010 at 5.

6 NOI, Table 2.

^{*}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.