

Before the U.S. Environmental Protection Agency

Regarding

**Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for
Medium- and Heavy-Duty Engines and Vehicles;
Proposed Rule**

Docket No. EPA-HQ-OAR-2010-0162

**Cambridge Public Hearing
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**Testimony of
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Good morning. My name is David Marshall and I am Senior Counsel to the Clean Air Task Force. I appreciate the opportunity to speak with you today. Based in Boston, the Clean Air Task Force is a national nonprofit, environmental advocacy organization whose mission includes reducing the adverse health, environmental and climate impacts of diesel vehicles. Our staff and consultants include scientists, economists, MBA's, engineers, and attorneys.

The joint proposal of EPA and the National Highway Traffic Safety Administration to reduce greenhouse gas emissions and increase fuel efficiency for medium- and heavy-duty highway vehicles beginning in 2014 is absolutely necessary, and should be strengthened and finalized promptly.

At present, the transportation sector is responsible for almost three-quarters of US oil consumption. US trucks and buses alone consume an aggregate of about 2.5 million barrels of oil each day, roughly 12% of the nation's total daily oil consumption. Transportation is also responsible for nearly 30% of US greenhouse gas emissions. And the trucks and buses subject to EPA's proposal contribute almost 20% of national mobile source greenhouse gas emissions.

In order to address the critical problem of climate change, deep reductions of greenhouse gas emissions will be required from the transportation sector, as well as from other sectors of the nation's economy.

EPA estimates that its heavy-duty highway proposal will reduce US oil consumption by more than 500 million barrels over the life of the regulated vehicles, and reduce greenhouse gas emissions by nearly 250 million metric

tons. Projected benefits exceed costs by about 3.5 to 1, even though this projection does not include many substantial benefits, such as reduced illness and premature death from reduced emissions of particulate matter and other criteria pollutants. The projected greenhouse gas emission reductions resulting from EPA's proposal are substantial, and the proposal is a good step in the right direction.

But make no mistake, much more is required. In 2008 alone, US net greenhouse gas emissions were about 6 billion metric tons. In order to stabilize the planet's temperature, the nation will need to move toward a carbon-neutral transportation system by mid-century, only 40 years from now. This will not happen without steep emission reductions from the highway sector, and will not happen without the development of a transportation system over the next few decades that will move the nation's freight in the most efficient way possible.

CATF supports the basic direction and structure of the rule presently proposed, including application of the standards to all medium-and heavy-duty truck classes, from Class 2b heavy pick-ups through Class 8 tractor trailers, beginning with model year 2014. We also support separate standards for engines, although we think the standards proposed need to be strengthened. And, we generally support the use of incentives and flexibility provisions to encourage the introduction and commercialization of advanced technologies, provided they do not compromise the overall level of greenhouse gas reductions

produced by the rule, and provided that they are not a weak substitute for tighter standards that will hasten the introduction of those technologies.

Although we support much in EPA's proposal, we do not believe that it takes full advantage of the technologies available to improve the efficiency of the heavy-duty highway fleet between now and 2018. Significant additional reductions in fuel use and greenhouse gas emissions could be obtained with a stronger rule. Delaying these reductions until after 2018 will only make it harder to obtain the very steep reductions needed thereafter. We therefore urge EPA to:

1. Strengthen the requirements for 2014-2018 model year vehicles by:
 - setting standards for long-haul tractor trailers;
 - tightening the proposed standards for vocational trucks;
 - tightening the proposed standards for heavy-duty pick-ups and vans and fully implementing them by 2016; and
 - tightening the proposed engine standards.
2. Require compliance certification through the use of accurate fuel efficiency tests that best reflect the actual performance of the vehicle on the road;
3. Promulgate a subsequent rule no later than 2013 requiring additional reductions in greenhouse gas emissions from medium- and heavy-duty vehicles with model years after 2018 that will take full advantage of technology developments between now and then; and
4. Expand future consideration and analysis of potential greenhouse gas reductions from the transportation sector beyond the highway sector, by examining potential efficiency gains in the nation's

goods movement system as a whole, including the potential for increased use of rail to carry freight.

Our specific comments for strengthening the standards follow. We also intend to file detailed written comments for the record.

We urge EPA to strengthen its proposal by taking full advantage of the technology options to reduce fuel consumption and greenhouse gas emissions from heavy-duty highway vehicles that are described in the recent comprehensive report by the National Academy of Sciences. I won't mention all of these now, but will point out some of the most important examples.

First, current technology can be applied to trailers of long-haul tractors to increase vehicle fuel savings by 25-30%. These long-haul trucks are responsible for about two-thirds of the emissions and fuel usage from the heavy-duty highway fleet, and therefore reductions from these trucks are especially important. EPA should capture these savings through standards for trailers.

Second, hybrid technology and other drivetrain technologies such as advanced transmissions can provide significant additional fuel economy benefits, especially for vocational trucks that experience much stop and start driving. EPA's standards for vocational trucks should reflect the availability of these technologies.

With respect to heavy pickups and vans, the NAS report found that fuel consumption in the Class 2b sector could be reduced by about 45% in the 2015 to 2020 timeframe. However, EPA's proposal calls only for a 10-15% reduction by 2018, and appears to be based on technologies supporting EPA's light-duty

standards for the 2012-2016 timeframe. EPA should not only tighten the standards for these pickups and vans, but also fully phase in the standards by 2016.

In closing, we welcome EPA's stated intention to promulgate additional standards in the future requiring emission reductions from this sector beyond those in the current proposal, taking into consideration advanced technologies as well as other regulatory approaches. We urge EPA to follow through with these critical regulatory efforts, and to develop standards that are technology-forcing, not technology-following.

We also urge EPA to strengthen the presently proposed rule and finalize it as soon as possible.

Thank you for the opportunity to provide these comments.