ENVIRONMENTAL DEFENSE FUND

STATEMENT ON

U.S. ENVIRONMENTAL PROTECTION AGENCY AND NATIONAL HIGHWAY TRAFFIC HIGHWAY SAFETY ADMINISTRATION

"PROPOSED RULE – GREENHOUSE GAS EMISSIONS AND FUEL EFFICIENCY STANDARDS FOR MEDIUM- AND HEAVY-DUTY ENGINES AND VEHICLES—PHASE 2"

EPA–HQ–OAR–2014–0827

NHTSA–2014–0132

* * *

HILARY SINNAMON

* * *

Public Hearing

Los Angeles, California

August 18, 2015

On behalf of Environmental Defense Fund and our more than 1 million members nationwide and the nearly 200,000 here in California, I sincerely thank you for the opportunity to testify today in support of a timely and rigorous Phase 2 program to reduce climate pollution and fuel consumption from our nation's fleet of heavy-duty trucks and

buses – the most swiftly growing transportation source of greenhouse gas emissions in the United States. [i]

The proposed standards build on the historic first ever fuel economy and greenhouse gas standards for the heavy-duty sector. The success of the first phase of the program is already being demonstrated by the demand for more efficient trucks – model year 2014 heavy-duty trucks saw the highest sales since 2005[ii] and Class 8 sales this summer are up an impressive 23% over the same time last year.[iii]

This second phase of the program provides a critical opportunity to deliver even greater emissions and oil reductions while spurring technological innovation and saving businesses and consumers money.

Heavy trucks transport the products we buy every day and perform thousands of other vital services. However, these vehicles also consume more than 135 million gallons of fuel every day and emit more than 450 million metric tons of climate pollution annually.[iv] In California, heavy trucks contribute significantly to the state's carbon pollution and air quality problems. Southern California has the worst air quality in the country and, in Los Angeles County alone, nearly 400,000 children suffer from asthma while living in an area that fails the health-based standards for ozone and particulate pollution.[v] The county is also home to the largest port complex in the nation, which relies on heavy-duty vehicles to sustain its operations – vehicles that can be cleaner and more efficient.

California has already demonstrated critical leadership, recognizing the importance of achieving emission reductions from the state's large trucks and buses—actions that have spurred critical progress both statewide and nationally. For example, California's trailer efficiency standards have yielded strong benefits and are now an important feature of the agencies' proposed rule. And just recently, Governor Brown announced an initiative to further strengthen the environmental and economic performance of California's transportation sector. The Phase 2 heavy-duty greenhouse gas and fuel economy

standards are one of the single most important opportunities to protect human health and the environment in California and across the nation.

While the proposals by EPA and DOT are an important step forward, there are many key opportunities to strengthen the standards in a way that secures the emission reductions that are needed to protect our families and communities and that drives American ingenuity to ensure we are innovating to strengthen our economy and protect our environment.

In addition to other opportunities, we respectfully make the following central recommendations.

#1: Strengthen the engine standard

A separate, rigorous engine standard is essential to deliver permanent, real-world emissions reductions. It also allows EPA and manufacturers to simultaneously evaluate NOx and CO2 emissions, ensuring that efficiency improvements do not result in higher NOx emissions. However, the proposed 4.2 percent engine efficiency improvement over ten years falls woefully short of what manufacturers and leading analyses have indicated is viable. Existing technologies have the potential to cost-effectively increase the engine efficiency by 15% beyond the 2017 levels. A weak engine standard undermines the overall tractor trailer standard and fails to drive a wide array of important engine technologies that can deliver real world reduction. The Agencies must finalize a protective engine standard that reflects the innovative path of today's technologies and carries out its legal responsibilities under our nation's clean air laws.

#2: Accelerate the timing of the standards to 2024

To ensure the Phase 2 program drives needed emission reductions and technological innovation in the near term, it is essential that standards be fully implemented by 2024. The agencies' own analysis – proposed as Alternative 4 – indicates this is eminently feasible and cost-effective. Speeding the transition to cleaner trucks would save an additional 200,000 barrels of oil per day in 2035, and avoid an additional 40 million

metric tons of global warming emissions annually.[vi] A faster timeline would also hasten the important NOx reductions– 2.4 million tons reduced over the life of the program – an improvement California would certainly benefit from.

#3: Promulgate protective emissions standards for the particulate pollution from APUs

Auxiliary power units (APUs) are among the technologies available to reduce fuel use from sleeper cab tractors due to idling. However, the particulate standards for diesel APUs, established under the nonroad rule, are not nearly as protective as the truck engine standards for MY 2007 and later trucks, which require the use of diesel particulate filters (DPFs) or comparable alternative. This disparity allows diesel APUs to emit more than five times as much harmful diesel particulate as the trucks they are relieving.[vii] This increase in particulate emissions will be especially significant at idling "hotspots" like truck stops, distribution centers and port areas like here in Long Beach. California has already established more protective standards for APUs and has concluded the technologies are available and highly cost-effective. We request that EPA follow California's lead and put in place protective particulate emissions standards for these units to protect public health and the environment from the harmful impacts of diesel particulates.

The Phase 2 standards represent an important opportunity to protect America's health, strengthen its economy, and improve energy security all while saving truckers money in fuel costs. I appreciate the opportunity to testify, and respectfully request the Agencies finalize rigorous protective standards for California and our nation.

Thank you.

---

[i] Energy Information Agency, *Annual Energy Outlook* (2015) Tables A-7 and A-19.
[ii] http://www.truckinginfo.com/channel/fleet-management/news/story/2014/10/healthy-demand-overall-for-trucks-in-september.aspx?ref=rel-recommended (last accessed November 5, 2014)
[iii] http://trailer-bodybuilders.com/chassis/medium-and-heavy-truck-sales-7-july
[iv] Energy Information Agency, *Annual Energy Outlook* (2015) Tables A-7 and A-19.

[v] American Lung Association, State of the Air 2015 website, report card for Los Angeles County. Available at: http://www.stateoftheair.org/2015/states/california/los-angeles.html (last accessed August 13, 2015).
[vi] UCS factsheet, "Newly Proposed Heavy-duty Truck Efficiency Standards for 2018-2029," July 2015. http://www.ucsusa.org/sites/default/files/attach/2015/07/proposed-heavy-duty-vehicles-standards.pdf
[vii] CARB, *Staff Report: Initial Statement of Reasons Notice of Public Hearing to Consider Requirements to Reduce Idling Emissions from New and In-Use Trucks, Beginning in 2008* (2005). Table 3 and Table 5, page 44.
http://www.arb.ca.gov/regact/hdvidle/isor.pdf