



ENVIRONMENTAL DEFENSE FUND

STATEMENT ON

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

"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

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Public Hearing

Chicago, Illinois

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On behalf of Environmental Defense Fund and our more than one million members nationwide, I sincerely thank you for the opportunity to testify today.

Freight trucks are one of the single fastest growing sources of climate disrupting emissions. Leaders in business and the environmental community alike recognize that rigorous well designed standards can save fleets and families in fuel costs, can reduce dangerous pollutants and can strengthen our global competitiveness by spurring the deployment of advanced technologies.

In fact, in a recent Wall Street Journal op-ed, Fred Krupp president of EDF, joined with Indra Nooyi, chairman and CEO of PepsiCo, in a call for “strong federal standards” to reduce fuel consumption and greenhouse gas emissions from heavy trucks.

**As proposed, the heavy truck fuel efficiency and greenhouse gas standards are an important step forward, but they fall short of being the strong standards our nation needs.**

We need final phase two standards that are built to enable innovators to advance further in their efforts spurring technologies that can achieve deeper emissions reductions and greater efficiency improvements. Standards that lock in currently available technology would be a terrible misread of market demand and would fail to carry out the technology-spurring statutory requirements of the nation’s clean air laws.

We respectfully make the following recommendations to realize the environmental and economic opportunity of protective standards.

#### #1 Strengthen the engine standard

An engine standard is essential for several reasons, including the ability to deliver permanent, real-world results; and allowing EPA and manufacturers to simultaneously evaluate NOx and CO2 emissions, ensuring that efficiency improvements do not result in higher NOx emissions.

Existing technologies have the potential to cost-effectively reduce engine fuel consumption by more than 15% beyond the 2017 levels. Through the impressive results of the DOE SuperTruck program, advanced technologies are demonstrating the ability to achieve even greater reductions

Engine improvements on the order of 15% will deliver significant cost savings for the end-users. Analysis by M.J. Bradley and Associates found that a final standard consistent with a 15% engine standard would reduce the lifecycle operation cost of a new sleeper combination truck by \$0.22 per mile in 2030 – saving fleet owners and their customers tens of billions annually.

#### #2 Accelerate the timing of the most stringency standards to 2024

The compliance timeline in alternative four is consistent with our assessment of the appropriate timeframe for implementing the most stringent standards. Nearly a decade away, it provides sufficient

lead time for the manufacturers to cost-effectively scale fuel saving solutions. It also better reflects the urgent need to reduce climate disrupting emissions.

### #3 Ensure emission reductions regardless of fuel choices

Diesel is the current dominate fuel for heavy trucks. While it is likely to remain the most widely used fuel throughout the phase two proposal, gasoline and natural gas are each making inroads in different market segments. The agencies need to safeguard projected savings from being eroded by lower standards for other fuels or perverse incentives in the rule.

EDF is particularly concerned about the ability of natural gas trucks to deliver real-world greenhouse gas reductions. Given the significant impact of upstream methane emissions, a recent ICCT study found that “inadequate attention to technologies designed to limit methane leakage ... would diminish the program benefits by as much as 38 percent.” This is simply not acceptable.

The proposal takes important steps forward in respect to its treatment of methane emissions from natural gas trucks. The requirements that natural gas engines have closed crankcases and the establishment, for the first time ever, of hold-time requirements for LNG fuel tanks, are important.

While it is critical for EPA to carry out the President’s January 2015 commitment to secure a 40-45 percent methane reduction by addressing the leak, discharges and venting associated with oil and gas development, there are several additional steps the agency can take under this rulemaking to further address the impact of methane emissions.

First, the EPA should use the current Global Warming Potential values put forward by the IPCC.

Second, the agency should recognize the full impact of methane by accounting for its impact at multiple time periods.

Third, the agency should adopt a full fuel cycle accounting approach for alternative fuels, which the agencies choose to pursue in the historic light-duty standards.

The agencies need to act on gasoline too. It is inconsistent with mandate of these agencies to continue to hold diesel and gasoline engines to different standards. We urge you to decrease the gap between the diesel and gasoline standards over the phase two program in order to completely phase out separate standards.

In sum, there are cost-effective, workable steps the agencies can take to finalize strong standards that will:

- Save tens-of-billions annually for the U.S. economy
- Support American innovation
- Reduce greenhouse gas emissions – on an absolute basis – and put us on a path for future gains.

To close, though, I want to note that as important as strong final rules are to me professionally, it is essential to me personally.

Two months ago, I was blessed with the birth of a second child. Climate change will be a consistent challenge for his generation. He will turn 35 in 2050 – by when our best science tells us that we must have emissions down 80% to avoid the worst impacts of a warming world. As much faith as I have in his ability and that of his generation, it is irresponsible for us to burden him and others with the immense challenges of a warming world. While this effort is but one of the many needed, the responsible course of action is to maximize the adoption of the cost-effective fuel-savings technologies available today.

Thank you