

May 28, 2015

The Honorable Gina McCarthy
EPA Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, S.E.
Washington, DC 20590

Dear Administrator McCarthy and Secretary Foxx:

We the undersigned commend your on-going efforts to implement strong fuel efficiency and emission standards for America. These rules save consumers and businesses money at the pump, lessen the economic and national security threats presented by oil dependence and price volatility, and help American manufacturers develop new technologies that spur investment in research, development, and production of advanced vehicles.

The transportation sector makes up 70 percent of all fuel consumption in the United States and accounts for almost 30 percent of the nation's greenhouse gas emissions, presenting a big opportunity for improvement. And while medium- and heavy-duty trucks only make up 7 percent of all vehicles on the road, they consume 25 percent of the fuel used by all vehicles.¹ In 2013, trucks on the road in America consumed 2.7 million barrels of oil per day and emitted 530 million metric tons of carbon pollution. Those numbers are expected to increase as the demand for more goods shipped by truck goes up.²

The first ever efficiency and emission standards for medium- and heavy-duty trucks in 2011 was an important step to increase truck fuel efficiency, and we urge you to ensure that the next round of standards for trucks expected by June 2015 includes robust goals. Experts believe that combined, the two phases of truck standards could cut fuel consumption and carbon pollution in new trucks by more than 40 percent compared to 2010 levels by 2025.³

Businesses and consumers across all sectors of the economy rely on trucks to move materials and products. Fuel is the single largest cost of owning and operating heavy-duty trucks, and truck fuel prices have increased 58 percent since 2009.⁴ It costs about \$73,000 per year to fuel a combination trailer, which gets about 6.5 miles to the gallon and makes up 70 percent of all freight tonnage in the U.S. These fuel costs are then passed on to consumers through higher priced products. The Consumer Federation of America reports that fuel costs for goods and services delivered by medium-and heavy-duty trucks cost U.S. households an average of \$1,100 in 2010.

The first phase truck standards are estimated to save a total of \$50 billion in fuel costs and reduce carbon pollution by 270 million metric tons. Phase two of the medium-and heavy-duty standards could reduce the cost of moving freight 7 percent, driving a fleet average net savings of \$0.21

¹ http://www.ucsusa.org/assets/documents/clean_vehicles/HDV-emissions-fuel-economy-factsheet.pdf

² <http://www.nrdc.org/transportation/files/fuel-savings-in-trucks-FS.pdf>

³ <http://www.nrdc.org/transportation/files/fuel-savings-in-trucks-FS.pdf>

⁴ <http://business.edf.org/blog/2014/06/11/save-your-company-costs-support-stronger-truck-efficiency-standards/>

per mile.⁵ As a result, truck owners could expect to see \$30,000 in fuel savings annually from the improvements, translating to a short 13-month return on investment.⁶

Strong fuel efficiency standards are good for American manufacturing because they incentivize innovation, making U.S. businesses more competitive globally. Investment in the research, production, and deployment of advanced vehicle technologies will give the United States an opportunity to lead in markets such as advanced batteries, which is growing quickly as technology costs have declined 50 percent since 2009.⁷

Thank you for your work to advance strong fuel efficiency and greenhouse gas emission standards for cars and trucks. We urge EPA and DOT to propose strong phase two standards for medium- and heavy-duty trucks in 2015.

Sincerely,

⁵ <http://business.edf.org/blog/2014/06/11/save-your-company-costs-support-stronger-truck-efficiency-standards/>

⁶ <http://www.nrdc.org/transportation/files/fuel-savings-in-trucks-FS.pdf>

⁷ <http://energy.gov/sites/prod/files/2013/09/f2/200130917-revolution-now.pdf>

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Achates Power Inc.
Advanced Building Solutions
AEG Energy Solutions, LLC
AllTherm / SolarLogic
Angelica's Garden
Arbor Brewing Company
Aries Energy
Asphalt Restoration Paving
Association of New Jersey Environmental
Commissions
Atlantic Renewable Energy, Inc.
Auburn Concrete
AWF Leasing Corporation
Axis Architecture
Backworks
Bad Weather Brewing
Barcode Technology Solutions
Barretto Bay Strategies
Bedrock Stone, Inc.
Bent Paddle Brewing Company
Better Environmental Solutions
BI2 Technologies
Biodiesel Co-op of LA
Biosynthetic Technologies
Black Bear Solar Institute
Blue Honey Biofuels
Blu-tab
Bold Alternatives
Bona Fide Green Goods
Bright Light Solar
BuildSense
Butler Sun Solutions, Inc.
Cali Carting
CALSTART
Cavalier Environmental Compliance
Services, Inc.
CCT Renewable Energy
Celentano Energy Services
Chip Magnet
Chippewa Valley Produce
Chippewa Valley Transit Alliance
Cielo Technologies
Citizens Action Coalition of Indiana
Citizens for a Future NH
City of Biddeford
Clean Air Carolina
Clean Air Council
Clean Energy Coalition
Clean Fuels Consulting
Clean Fuels of West Tennessee
Clean Fuels Ohio
Cleantech San Diego
CLEAResult
Community Energy Partners
Concrete Craftsman
Consolidated Mail Service, Inc.
ConVerdant Vehicles, LLC
Cool Ponds
Country Hermitage Bed and Breakfast
Crystal Mountain
CSO Architects, Inc.
DF Richard Energy
Dillon Transport
Dogpatch Biofuels
Donahue Gas, Inc.
Dovetail Solar and Wind
DropCatch
Duke's Alehouse and Kitchen
DVA Commercial RE
E2 Technologies
E2taxi, LLC
E3 Innovate
Earth Solar Technologies Corporation
Earthgarage
Eastern Carolina Organics
EastWest Organics, LLC
Eclectica on Grand
EcoLogical Solutions, Inc.
Ecology Center
Edison Solar & Wind Ltd.
Elements Engineering, LLC
Ellison Electric, Inc.
EnergyOH.us
Enviro-Max Inc.
Environment America
Environment Arizona
Environment California
Environment Colorado
Environment Connecticut
Environment Florida
Environment Georgia

Environment Illinois
Environment Iowa
Environment Maine
Environment Maryland
Environment Massachusetts
Environment Michigan
Environment Minnesota
Environment Missouri
Environment Montana
Environment Nevada
Environment New Hampshire
Environment New Jersey
Environment New Mexico
Environment New York
Environment North Carolina
Environment Ohio
Environment Oregon
Environment Rhode Island
Environment Texas
Environment Virginia
Environment Washington
Environmental Enterprises
Environmental Entrepreneurs
Environmental League of Massachusetts
eScrapinc, LLC
Everest Imports
Evolution Marketing, LLC
Expedite Renewable Energy
Fireplace Editions
Fischer Farms & Apiaries, LLC
Four Elements Herbals
Foxtail Farms
Frayley Trucking
Freeman Applegate
Freightliner of New Hampshire
Fresh Software
FuelMiner
GenPro Energy Solutions
Gorham Land Company
Granite State Biofuels
Granite State Clean Cities Coalition
Great Glen Trails Outdoor Center
Great Lakes Renewable Energy Association
Greater Cleveland Regional Transit
Authority
Green Alliance

Green Alternatives, Inc.
Green Cab, CA
Green Cab, TN
Green Earth Baby Works
Green Earth Solar
Green Energy Maine
Green Grocer Chicago
Green Power Energy
Green Skyline, LLC
Green Spaces
Green Way Demolition
Green Way Energy, LLC
Greene Tech Renewable Energy
Greener by Design
greenMARK COLLABORATIVE
GreenStar
GREENSTONE
Group Against Smog and Pollution
Growth Capital Network
High Plains Architects
Hoosier Environmental Council
Idle Free Systems
IKEA Distribution Services Inc
Incredible Adventures
Indy Paints Unlimited
Jack Pine Brewery
Juhl Energy
Kaitanna Solar, LLC
Katahdin Energy Works
Kavarna Coffeehouse
Lakefront Brewery
Lamprey Energy, Inc.
LaRochelle Interior Designs
Lee Auto Groups
Leelanau Community Energy, LLC
Leisure Wheels Quadracycles, LLC
Leonardo Academy
Lightwave
Longwood Energy Group, LLC
Los Angeles Cleantech Incubator
Maine Solar
Maine Sunworks
Mann Plumbing Inc.
Marek Landscaping, LLC
Mark Owens Residential Design
Marshall Auto Body

Mazza & Sons, Inc.
Michael Fields Agricultural Institute
Michigan Environmental Council
Michigan Land Use Institute
Michigan Solar Solutions
Middle Tennessee Clean Fuels
Minnesota Renewable Energies
Mogie's Pub and Restaurant
Momentum Dynamics Corporation
Moms Clean Air Force
Mona Lisa's
Morfitt Media
Morton Solar
Motorcars Honda
Mountain Riders Alliance
Mt. Washington Auto Road
National Co+op Grocers
Natural Resources Council of Maine
Netcom
New Energy Economy
New England Clean Energy Council
New Generation Builders, LLC
New Morning Energy, LLC
New York Public Interest Research Group
Next Step Energy
NH Peterbilt, Inc.
NH Solar Garden
North American Equipment Upfitters, Inc.
North Carolina Clean Energy Technology
Center
Northeast Insulation Services
Northland Forest Products, Inc.
Odyne Systems
Ohio Environmental Council
Ohio Interfaith Power & Light
Olive, Fine Organic Living
One Planet Solar and wind, Inc.
Optimum Expenditures Group LLC
Optimus Technologies
O'Sullivan and Associates
Outpost Natural Foods
Pedaling a Dream
PennEnvironment
PepsiCo
Phillips-Medisize
Phoenix Cars LLC. dba: Phoenix Motorcars

Powell Energy & Solar
Powers Energy of America, Inc.
Practical Energy Solutions
Principia, LLC
Propst Consulting
Public Finance & Energy Advisors, LLC
Pure Dwelling
Pure Eco Environmental Solutions
quasar energy group
Rectify, LLC
Renewable Construction Services
Replex Plastics
RER Energy Group
ReVision Energy
Rhodes Car International
Rochester Truck, Inc.
Rodgers & Art Graphic Design
Rosenholm Dairy
Rudd Asset Management
Rural Renewable Energy Alliance
Rutgers EcoComplex
Saunders Hotel Group
Save the Dunes
Scythe Supply
ShapeCorp
Silicon Valley Leadership Group
Simple Energy Works
Simply Living
Soap and Paper Factory
Solar Plexus
SolarZentrum NA, Inc.
SOMS Technologies
Southern Light Solar
Steady State Supply
Stella Blues
Stephanie Austin and Associates
Stony Brook Group
Stonyfield
Stumpers Building Services, Inc.
Sun Integration
Sundance Solar
Sustain Charlotte
Sustainability Roundtable, Inc.
Sustainable Future
Sustainable New Energy
Sustainable Plymouth

Sustainergy Cooperative
Sweeps
Tangled Up In Hue
Tennessee Alliance for Progress
Tennessee Environmental Council
Tennessee Solar Energy Association
Terra Shares
The Compass Group
The Garrett Group Ltd.
The Livery
The Ohio Fuel Cell Coalition
The Purple Tree
The Red Room
The Wisconsin Urban and Rural Transit
Association
Third Stone Farm
Third Sun Solar
Timberfish Technologies
TruNorth Solar
Turnip Rock Farm
Uncommon Ground
Union Cab
Universal Tactile Systems
University of Michigan - Dearborn Organic
Community Garden
Valley Watch
Verterra Energy
Viroqua Biodynamic Group
Voorhees Transportation Center at Rutgers
University
Warren Energy Engineering
Waseda Farms
Watson-Forsberg
WE ACT for Environmental Justice
Wes Engineering
West Michigan Environmental Action
Council
Williams Allwein & Moser, LLC
Wisconsin Business Alliance
Wisconsin Environment
Wisconsin Transit Riders Alliance
Witwright Institute LLC
Wood Thumb
World Wide Automobile Service
XL Hybrids
ZeroTruck Corp