

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.<sup>1</sup> 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.<sup>2</sup>

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.<sup>3</sup>

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.<sup>4</sup> 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

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<sup>1</sup> [http://www.ucsusa.org/assets/documents/clean\\_vehicles/HDV-emissions-fuel-economy-factsheet.pdf](http://www.ucsusa.org/assets/documents/clean_vehicles/HDV-emissions-fuel-economy-factsheet.pdf)

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

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

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

per mile.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup>

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,

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

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

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

310 AI  
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.  
LaRoche 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