



October 6, 2010

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

CC: The Honorable David Strickland - Administrator, National Highway and Traffic Safety Administration
The Honorable Nancy Sutley - Chairwoman, Council on Environmental Quality
The Honorable Ray LaHood - Secretary, U.S. Department of Transportation

Dear Administrator Jackson:

On May 21st, President Obama announced plans to cut America's dependence on oil by setting fuel efficiency and pollution standards for medium- and heavy-duty vehicles. Together these vehicles – which include delivery trucks, buses, and long-haul freight trucks – consume as much as 37 billion gallons of fuel every year and emit 20 percent of transportation greenhouse gas (GHG) pollution although they make up just 4 percent of all vehicles on the road.

By setting the first-ever GHG and fuel efficiency standards for medium and heavy-duty vehicles, America can lead the world in the development and deployment of a new generation of cleaner trucks that will reduce our dependence on oil, strengthen the American auto and truck manufacturing sectors, create quality jobs and significantly reduce GHG pollution.

BlueGreen Alliance, working among a unique alliance of labor and environmental movement perspectives – the Teamsters, United Auto Workers, Sierra Club, Natural Resources Defense Council, Union of Concerned Scientists, and National Wildlife Federation – support efforts by the Administration to set new truck standards that improve efficiency and cut pollution. We respectfully propose the following principles be integrated as the rulemaking process moves forward:

- 1) Advanced vehicle technologies should be utilized to make annual progress on increasing efficiency and reducing transportation sector oil dependence and pollution to the highest degree that is technically and economically feasible. For example, studies show that existing technologies, such as more efficient engines and transmissions, aerodynamic fittings and fuel-efficient tires, can cut fuel consumption and carbon pollution from long-haul tractor- trailers in a cost-effective manner.

2) Complementary truck efficiency programs should take into account trucking's unique market structure and encourage the acquisition of cleaner vehicles by owner-operators and fleets. These supportive measures could help minimize deferral of vehicle purchases, create and sustain more quality jobs, maximize economic benefits to American vehicle and component manufacturers and accelerate gains in fuel efficiency and pollution reduction.

3) The rulemaking process should consider impacts to drivers and workers throughout the trucking industry and ensure that standards deliver positive net benefits to affected parties. As a complement to the rulemaking, developing new and expanding existing programs (i.e. EPA SmartWay) to promote cleaner vehicle technology and vehicle acquisition can help accomplish this, and should include accountability mechanisms to ensure incentives for new vehicle purchase as well as retrofit deliver the highest benefit to workers and businesses.

We have conveyed these ideas to your policy staff in recent conversations and will continue to engage them as we approach the proposed rulemaking announcement and beyond. We look forward to working with you and your agencies as these standards are finalized to ensure the best possible outcomes from this process for American workers, our communities, the economy and the environment.

Sincerely,

A handwritten signature in black ink that reads "David Foster". The signature is written in a cursive, slightly stylized font.

David Foster
Executive Director, BlueGreen Alliance