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January 5, 2018

Administrator Scott Pruitt
Office of the Administrator 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

CC: Deputy Administrator Michael Flynn
Environmental Protection Agency

Re. Proposed Rule: Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits. Docket No. EPA-HQ-OAR-2014-0827-2368

Dear Administrator Pruitt,

As members of Business for Innovative Climate and Energy Policy (BICEP), an advocacy coalition of leading businesses committed to working with policy makers to enact meaningful energy and climate legislation, we are writing to strongly oppose EPA's proposed rule to repeal the emission requirements for glider vehicles, glider engines, and glider kits (hereafter known as "gliders"). Repealing emission requirements for these highly polluting engines will have a detrimental impact on human health, and penalizes companies that have invested in clean fleets. By providing a loophole for highly polluting trucks, EPA would undermine a level playing field for business by putting both trucking companies that have invested in clean trucks and those companies that want to use them at a disadvantage.

We have worked hard to invest in emissions reductions from our fleet, and we see the benefits – both economic and environmental. We also recognize the value of regulatory uniformity and certainty in facilitating future growth and planning, which leads to greater improvements in clean technologies. Reopening this loophole would negate those benefits, undermine a level playing field, and lead to a regulatory patchwork. Given that freight shipping is slated to increase overall, this proposal would result in even greater future emissions from the sector.

This proposal would allow the use of older engines that produce significantly more pollution than their modern counterparts. Older engines lead to increased soot and smog forming nitrogen oxides and particulate matter (NOx and PM), which have documented detrimental

health impacts.¹ Over the years, the EPA has worked to reduce harmful pollutants specifically linked to diesel exhaust. As a result of EPA's work, today's NOx and PM emissions are 90% below former levels.² We strongly urge the EPA to uphold its prior findings and ensure continued reductions in dangerous emissions from diesel engines.

The environmental and health costs of repealing the glider emissions are staggering. Recently, EPA found that one glider truck emits 30 times the nitrogen oxides (NOx) and 60 times the amount of particulate matter (PM, or soot) than comparable model year 2014 and 2015 trucks.³ If the emission requirements are repealed and the loophole stays open until 2025, glider trucks would make up only around 5% of freight trucks on the road, but they would account for one-third of all NOx and PM emitted by freight trucks nationally.

Increased levels of NOx and PM will have devastating effects on air quality and human health, including increased instances and severity of asthma attacks, especially among children and the elderly. In addition to asthma, a strong body of research links long-term exposure to diesel exhaust with stroke, heart disease, lung cancer, pulmonary disease, chronic respiratory illnesses, bronchitis infections, and birth defects.⁴⁻⁵ Analyses have shown that unrestricted sale of highly polluting glider engines would lead to as many as 1,600 premature deaths annually⁶ and healthcare damages due to diesel-related pollution would quadruple under this proposal and could exceed \$16.2 billion.⁷

Investment in pollution control pays dividends and helps save thousands of lives – it prevents hospital visits, reduces the number of sick days taken annually, and decreases serious public health risks. As companies that rely on shipping goods, we recognize that it is possible to both reduce harm to the environment and human health while simultaneously contributing to the economy.

In sum, we urge you to retain the current emission requirements for gliders. It is important to us that the transportation of our goods does not result in negative public health impacts, and we believe that those trucking companies that have invested in clean technologies, and those companies that use them, should not be penalized. Given that this proposal will result in significant harm to public health, and undermine a level playing field for those who support clean technologies, we strongly oppose this proposal.

Sincerely,



Anne L. Kelly

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¹ <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-2417>

² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4714243/>

³ <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-2417>

⁴ <https://www.automotiveworld.com/news-releases/commercial-vehicles-news-releases/icct-scott-pruitts-epa-wants-resurrect-dirty-diesel/>

⁵ [http://www.jpeds.com/article/S0022-3476\(17\)31330-6/pdf](http://www.jpeds.com/article/S0022-3476(17)31330-6/pdf)

⁶ <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>

⁷ <http://www.theicct.org/blog/staff/glider-proposal-means-resurrecting-dirty-diesel>