

Honorable Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
January 5, 2018

Re: Proposed Rule for the Repeal of Emissions Requirements for Glider Vehicles, Glider Engines, and Glider Kits; EPA-HQ-OAR-2014-0827

Dear Administrator Pruitt:

The Diesel Emissions Reduction Act (DERA) Coalition is a uniquely broad coalition of environmental, science-based, public health, commercial and industry groups who strongly support efforts to encourage diesel fleet modernization to the cleanest available diesel technology.

The members of our DERA Coalition are committed to EPA policies that lower emissions from medium and heavy-duty vehicles and many have worked very closely with EPA in the development of the Phase 2 Rule establishing proposed emission standards for these vehicles. For the reasons stated below, the undersigned members of the DERA Coalition oppose EPA's proposal to rescind the provisions of the rule related to "glider kits" or new vehicles to be equipped with older, more polluting engines.

We are concerned that EPA's decision to encourage the continued proliferation of older engines through the glider industry would increase emissions from medium and heavy-duty vehicles and undermines the work of the Coalition and cooperative federalism with the EPA and states. EPA's own November 2017 tailpipe emission testing indicated that, under highway cruise conditions, new gliders equipped with used powertrains emit more than 40 times the level of NO_x and PM as vehicles equipped with the 2014 or 2015 MY engines and emission control technology. Since implementation, DERA has become one of the most cost-effective federal clean air programs to provide financial assistance as we transition to the new Phase 2 requirements. EPA estimates every \$1 in federal assistance is met with another \$3 in non-federal matching funds, including significant investments from the private sector, and generates \$5 to \$21 in health and economic benefits. Every state benefits because 30 percent of the funding goes to support state programs which each has established.

EPA's most recent estimates indicate that the DERA program has upgraded nearly 73,000 vehicles or pieces of equipment, and saved over 450 million gallons of fuel. EPA estimates that total lifetime emission reductions achieved through DERA funding are 14,700 tons of PM and 335,200 tons of NO_x. These reductions have created up to \$12.6 billion of health benefits. The program helps to improve air quality at the nation's schools, construction sites, highways, railyards and ports.

The undersigned Members of the DERA coalition support the Phase 2 final rule restrictions on glider kits. Our Members have worked together in support of technologies and programs that have resulted in the production and adoption of the cleanest and most fuel efficient diesel trucks ever. EPA's decision to allow the growth of glider kits, encouraging the use of less clean engines and after-treatment technologies would undermine substantial investments our member companies have made in clean diesel technology, and will make attainment of National Ambient Air Quality Standards even more difficult for local communities.

**Advanced Engine Systems Institute - American Lung Association
American Trucking Associations - Clean Air Task Force - Corning Incorporated
Cummins, Inc. - Diesel Technology Forum - Environmental Defense Fund
Emissions Control Technology Association
NAFA Fleet Management Association
National Association of State Directors of Pupil Transportation Services
National School Transportation Association - Navistar
South Coast Air Quality Management District
Truck & Engine Manufacturers Association - Umicore Autocat Inc.
Volvo Group North America**