

LLDTs), rated at less than 6000 pounds GVWR and "heavy light-duty trucks" (or HLDTs), rated at more than 6000 pounds GVWR. For new passenger cars and light LDTs, the Tier 2 standards phase-in beginning in MY 2004, and are to be fully phased-in by MY 2007. During the phase-in period of MYs 2004–2007, all passenger cars and light LDTs not certified to the primary Tier 2 standards must meet an interim standard equivalent to the current National Low Emission Vehicle (NLEV) standards for light duty vehicles. In addition to establishing new emissions standards for vehicles, the Tier 2 standards also establish limits for the sulfur content of gasoline.

General Motors and Ford very briefly suggested, without explanation, the Tier 2 standards might limit diesel sales. It was unclear whether they were referring to current or advanced diesels. We note that EPA, when issuing the Tier 2 standards, responded to comments it received regarding the impact of the Tier 2 standard and its impact on the Supplemental Federal Test Procedure and concluded that the Tier 2 standards would not adversely affect fuel economy.

## 2. Onboard Refueling Vapor Recovery

On April 6, 1994, EPA published a final rule (59 FR 16262) establishing requirements controlling vehicle-refueling emissions through the use of onboard refueling vapor recovery (ORVR) vehicle-based systems. These requirements applied to light-duty vehicles beginning in MY 1998, and were phased-in over three model years. The ORVR requirements also apply to light-duty trucks with a gross vehicle weight rating up to 6000 lbs, beginning in MY 2001 and phasing-in over three model years at the same rate as for light-duty vehicles. For light-duty trucks with a gross vehicle weight rating of 6001–8500 lbs, the ORVR requirements first apply in MY 2004 and phase-in over three model years at the same rate as light-duty vehicles.

The ORVR requirements impose a small weight penalty on vehicles as they necessitate the installation of vapor recovery canisters and associated tubing and hardware. In its comments, Honda indicated that it did not agree with the assertion in the NPRM that the ORVR system, which results in fuel vapors being made available for combustion, provides a fuel economy benefit offsetting the weight of the system.

Assuming the correctness of Honda's argument that there are negligible fuel economy benefits from ORVR systems, we note that weight increases attributable to replacing older vapor

recovery technology with ORVR compliant systems are not likely to be significant enough to have an impact on fuel economy.

## 3. Supplemental Federal Test Procedure

The Federal Test Procedure (FTP) contains the test conditions and procedures used by the EPA when conducting new vehicle emissions and fuel economy tests. On October 26, 1996, EPA published a final rule (61 FR 54852) revising the tailpipe emission portions of the Federal Test Procedure (FTP) for light-duty vehicles (LDVs) and light-duty trucks (LDTs). The revision created a Supplemental Federal Test Procedure (SFTP) designed to address shortcomings with the existing FTP in the representation of aggressive (high speed and/or high acceleration) driving behavior, rapid speed fluctuations, driving behavior following startup, and use of air conditioning. The SFTP also contains requirements designed to more accurately reflect real road forces on the test dynamometer. EPA chose to apply the SFTP requirements to trucks through a phase-in. Light-duty trucks with a gross vehicle weight rating (GVWR) up to 6000 lbs were subject to a three-year phase-in ending in MY 2002. Heavy light-duty trucks, those with a GVWR greater than 6000 lbs but not greater than 8500 lbs, are subject to a phase-in in which 40 percent of each manufacturer's production must meet the SFTP requirements in MY 2002, 80 percent in MY 2003, and 100 percent in MY 2004.

MY 2004 is the final year of the SFTP requirement phase-in for light trucks subject to CAFE standards. Neither Ford nor General Motors indicated in their comments on the MY 2004 CAFE NPRM that the SFTP requirements would have any impact on their ability to meet the MY 2004 standard.

Although DaimlerChrysler has indicated that the changes to the FTP will have a disproportionately negative impact on light truck fuel economy, EPA has determined that the net effect on fuel economy for the recent test procedure changes is near zero. EPA considered the effects of four test changes: single-roll electric dynamometer with full-speed load simulation, elimination of the 10 percent air conditioning load factor, elimination of the 5,500 pound maximum test weight for cars, and improved test equipment. While some changes decreased measured fuel economy, others raised it. The net result was a near zero effect. This determination was based on the total fleet, which is a mix of front wheel

drive and rear wheel drive cars and trucks.

Considering light trucks alone is not likely to change that determination. The light truck fleet has a larger mix of rear wheel drive vehicles than the light vehicle fleet. This would lead to a slightly increased effect of the single roll dynamometer and thereby slightly lower measured fuel economy. However, the truck sub-class also has higher road load horsepower than the combined fleet. This would lead to slightly higher effects due to the elimination of the 10 percent air conditioning load and thereby slightly higher measured fuel economy.

Consequently, there is no need to adjust the CAFE standards for these test procedures. The net effect of the combined test procedure changes on the truck sub-class is still expected to be near zero.

## 4. California Air Resources Board LEV II and Section 177 States

The State of California Low Emission Vehicle II regulations (LEV II) will apply to passenger cars and light trucks in MY 2004. The LEV II amendments restructure the light-duty truck category so that trucks with a gross vehicle weight rating of 8,500 pounds or lower are subject to the same low-emission vehicle standards as passenger cars. LEV II requirements also include more stringent emission standards for passenger car and light-duty truck LEVs and ultra low emission vehicles (ULEVs), and establish phase-in requirements that begin in 2004. During the initial year of the four-year phase-in, the LEV II standards require that 25 percent of production comply.

The agency notes that compliance with increased emission requirements is most often achieved through more sophisticated combustion management. The improvements and refinement in engine controls to achieve this end generally improve fuel efficiency and have a positive impact on fuel economy.

In summary, the agency believes that there will be no impact on fuel economy from emissions standards on light truck fuel economy between the baseline MY 2001 and MY 2007 fleets.

## IX. The Need of the Nation To Conserve Energy

EPCA specifically directs the Department to balance the technological and economic challenges with the nation's need to conserve energy. While EPCA grew out of the energy crisis of the 1970s, the United States still faces considerable energy challenges today. Increasingly, U.S. energy consumption has been outstripping U.S. energy