



March 21, 2023

The Honorable Kevin McCarthy  
Speaker  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Charles Schumer  
Majority Leader  
U.S. Senate  
Washington, D.C. 20510

The Honorable Hakeem Jeffries  
Democratic Leader  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Mitch McConnell  
Minority Leader  
U.S. Senate  
Washington, D.C. 20510

**RE: USTMA Legislative Priorities for the 118<sup>th</sup> Congress**

Dear Speaker McCarthy, Leader Schumer, Leader Jeffries and Leader McConnell:

As you begin the important work of the 118<sup>th</sup> Congress, we see renewed opportunities to enhance the lives of the American people. The U.S. Tire Manufacturers Association (USTMA) and our member companies remain committed to working with you to advance road safety, tire innovation and environmental stewardship and we hope to continue to drive solutions America needs in the 21<sup>st</sup> century.

USTMA supports six key policy priorities for the expansion of advanced technologies and responsible infrastructure:

- We support a **unified North American approach to consumer tire information and standards** and urge NHTSA to lead this process by publishing regulations mandated by EISA and the FAST Act;
- We support investment in the **expansion of sustainable and circular infrastructure solutions for scrap tires**, such as use in rubber modified asphalt (RMA) in infrastructure projects and research to assess the benefits of tire derived aggregate (TDA);
- We encourage Congress to support funding for research to identify mitigation solutions for **roadway runoff** to ensure stormwater is protected as a valuable resource;
- We support the **use and domestic manufacturing of retreaded tires** for commercial vehicles to enhance sustainability and grow American jobs;
- We encourage Congress to ensure fair, **equal and standardized access to digital vehicle data** and infrastructure assets; and
- We support federal funding to develop **domestic sources of natural rubber**.

**USTMA asks Congress to urge the National Highway Traffic Safety Administration (NHTSA) to publish consumer tire information and standards as mandated by EISA and the FAST Act.**

USTMA has long supported a singular, nationwide approach to tire information and standards. In 2007, our trade association worked closely with Congress on language in the Energy Independence and Security Act (EISA) that would establish a national tire fuel efficiency consumer information program to

educate consumers about the effect of tires on automobile fuel efficiency, traction and durability. Our organization also engaged with Congress on the Fixing America's Surface Transportation (FAST) Act of 2015 to include the promulgation of regulations for tire fuel efficiency and wet traction minimum performance standards. However, after almost sixteen years since EISA was signed into law and eight years since the passage of the FAST Act, NHTSA has not acted on either of the Congressional mandates.

In the absence of a federal framework in this space, a staff report on tire efficiency minimum standards from the California Energy Commission has been proposed that would eliminate nearly all the tires currently on the market in the state by 2028. As such, we ask Congress to urge NHTSA to swiftly comply with the directives under EISA and the FAST Act to preempt any deleterious actions taken by state regulatory bodies.

**We support investment in the expansion of sustainable and circular infrastructure solutions for scrap tires, such as use of rubber modified asphalt (RMA) in infrastructure projects and research to assess the benefits of tire derived aggregate (TDA).**

Each year over 250 million scrap tires are generated in the United States. While tires remain one of the most recycled products in the country, ensuring end-use markets continue to grow to consume annually generated scrap tires is essential to preventing tire stockpiles and illegal dumping. For more than three decades, USTMA and our members have been steadfast in our efforts to develop and expand markets for scrap tires to ensure 100% of scrap tires enter sustainable and circular end-use markets. Markets for rubber modified asphalt and tire derived aggregate in civil engineering projects have the greatest potential for growth given the historic investments made by the Bipartisan Infrastructure Law and the Investment Reduction Act.

#### Rubber Modified Asphalt (RMA)

RMA is a mixture of recycled ground tire rubber and asphalt that provides proven economic, environmental and performance benefits. RMA increases pavement service life and reduces road maintenance activities, leading to significant cost savings compared to traditional asphalt. It reduces CO<sub>2</sub> emissions by 32%, lowering energy consumption over the lifetime of pavement as compared to traditional asphalt. RMA also provides performance and safety benefits by increasing skid resistance, reducing road noise and reducing road spray in wet conditions.

Given RMA's proven economic, environmental and performance benefits, we urge Congress to:

- 1) Identify RMA as a preferred pavement material for federal projects;
- 2) Support funding for research to further study RMA use benefits, including supplementing preliminary findings of reductions in environmental impact when using RMA.

#### Tire Derived Aggregate (TDA)

TDA is large shreds of scrap tires that can be used as cost-effective infill material for roadside embankments, retaining walls and stormwater infiltration galleries. TDA reduces costs compared to traditional mined minerals like gravel, since the lightweight recycled material costs less to transport. It provides improved drainage in stormwater infiltration galleries due to its larger void space compared to gravel, potentially capturing greater water volume with a smaller gallery footprint. Studies show TDA use in infiltration galleries can reduce metals loading in stormwater. TDA used under railroad tracks also has proven effective and cost-efficient in mitigating ground vibrations from rail lines, a significant

benefit to neighboring communities. For these compelling benefits, USTMA urges Congress to fund research and demonstration projects using TDA in federal, state and local construction projects.

**USTMA urges Congress to support funding for research to identify, develop and expand the use of mitigation solutions for roadway runoff.**

Rain and snow melt causes contaminants from vehicles, road and highway construction and maintenance to be washed from roads directly into water bodies. To ensure stormwater is protected as a valuable resource, we encourage funding for research to identify, develop and expand the use of mitigation strategies and technologies to treat stormwater runoff from roadways. We also support the deployment of existing technologies that filter pollutants before they enter waterways, including the use of stormwater bioretention technologies, use of permeable pavements and increased street sweeping in urban areas. Rebuilding America's roadways should be done with the future in mind to increase driver safety and ensure reductions in environmental impacts, including mitigation for roadway runoff.

**USTMA promotes domestic manufacturing and the use of retreaded tires for commercial vehicles to enhance sustainability and grow American jobs.**

Commercial tire retreading provides a highly effective way to recycle tires with many additional notable economic and environmental benefits. In addition to job creation, retreading reduces energy consumption, CO<sub>2</sub> emissions, raw material usage and tire disposal challenges. Despite these advantages, retreading of commercial tires has steadily decreased over the last 25 years.

USTMA encourages Congress to provide financial incentives for tire retreading. This could be accomplished through a per-tire manufacturing grant to tire retreaders or as a tax credit to purchasers of retreaded tires. Congress has an opportunity to lead by example by requiring the purchase of American-made retreaded tires for the federal fleet and any fleet under federal contract, where possible, given precedent for such policies.

**We support federal funding to develop domestic sources of natural rubber**

Natural rubber is used in all tires and provides needed performance and durability qualities that can only be achieved through its use. For example, commercial and military aircraft tire treads and heavy-duty truck and bus tread are made almost completely from natural rubber because of unique properties that synthetic rubber does not offer. With 90% of natural rubber supply coming from southeast Asia, any supply chain interruptions may have serious repercussions for the U.S. tire market, potentially restricting production of truck, aircraft and military vehicles and aircraft tires.

Since natural rubber is critical to the tire industry, national security and the U.S. economy, USTMA strongly supports efforts to promote the development of a domestic supply of natural rubber, including guayule and TKS (dandelion), which have led to successful experimental tires.

We urge Congress to support the development of a domestic natural rubber industry to include:

- 1) Economic support for farmers to incentivize needed investments to help them adapt to planting rubber-producing crops as part of the normal agricultural economy;

- 2) Economic support to scale commercial processing facilities to extract the rubber and other high-value co-products from guayule and TKS; and
- 3) Funding for research to further develop domestic sources of natural rubber.

### **Ensure equal and standardized access to digital vehicle and infrastructure assets**

The future of mobility is changing rapidly with major innovations in advanced driver-assistance systems (ADAS), autonomous driving, vehicle electrification and vehicle-to-vehicle and vehicle-to-infrastructure connectivity. Information generated by the tire and paired with vehicle data can be leveraged to link information about the road and the vehicle to provide key information to the driver around fuel efficiency, tire maintenance and monitoring road and weather conditions.

We urge Congress to support fair, equal and standardized access to digital vehicle and infrastructure assets, including real-time access to data and hardware resources to advance innovation of connected and autonomous technologies in the United States.

U.S. tire manufacturers are a critical part of the American economy, with a commitment to sustainable practices in every aspect of their businesses. As global leaders in manufacturing, our companies embrace a shared responsibility of helping to achieve a more sustainable society. We look forward to continuing our work together. For more information, please contact Nicholas Scoufaras, USTMA's Manager of Public and Government Affairs, at (202) 682-4853 or [nscoufaras@ustires.org](mailto:nscoufaras@ustires.org).

Sincerely,



Anne Forristall Luke

President and CEO

U.S. Tire Manufacturers Association

cc: The Honorable Joseph R. Biden, President of the United States  
The Honorable Pete Buttigieg, Secretary, U.S. Department of Transportation  
The Honorable Mitch Landrieu, White House Senior Advisor and Infrastructure Coordinator  
The Honorable Robin Carnahan, Administrator, U.S. General Services Administration  
The Honorable Ali Zaidi, White House National Climate Advisor  
The Honorable Gina Raimondo, Secretary, U.S. Department of Commerce  
The Honorable Michael Regan, Administrator, U.S. Environmental Protection Agency  
Members, U.S. Senate  
Members, U.S. House of Representatives