



February 3, 2022

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Charles E. Schumer
Majority Leader
United States Senate
Washington, D.C. 20510

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

The Honorable Mitch McConnell
Minority Leader
United States Senate
Washington, D.C. 20510

RE: Legislative Priorities of the U.S. Tire Manufacturers Association

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

As the 117th Congress begins its second session, I write to you on behalf of the U.S. Tire Manufacturers Association (USTMA)¹ to share our appreciation for the work accomplished in the last year and our encouragement for continued legislative success in the months ahead. With tire manufacturing directly supporting more than a quarter million jobs across every congressional district, USTMA and its member companies recognize the significance of the action taken last session and hope that momentum grows in 2022.

One achievement of great importance to the U.S. tire manufacturing industry was the enactment of the Infrastructure Investment and Jobs Act, which includes several provisions that would advance scrap tire markets and improve the resiliency and sustainability of our nation's infrastructure. As the administration begins implementation of this historic law, USTMA encourages you as our legislative leaders to continue working collaboratively on our shared priorities that will propel the United States forward as a leader in tire technology research and strengthen the American tire manufacturing industry's contribution to our nation's economy.

Policies significant to advancing our nation's mobility and technological capacity include:

- Investments for the research and integration of rubber modified asphalt (RMA) to advance infrastructure projects
- Research investments for tire derived aggregate (TDA) in stormwater infiltration galleries
- Research investments for stormwater runoff and roadway runoff mitigation efforts
- Incentives for the use and manufacturing of retreaded tires
- Incentives for the use of low rolling resistance tires for public and private use, and
- Federal fleet management policy that ensures 100% of tires in the federal fleet enter circular and sustainable scrap tire markets

¹ USTMA is the national trade association for tire manufacturers that produce tires in the United States. Our 12 member companies operate 57 tire-related manufacturing facilities in 17 states, accounting for over 80% of tires sold domestically.

1. Invest in the research and integration of rubber modified asphalt (RMA) in new and existing infrastructure projects.

RMA is a mixture of ground tire rubber with asphalt that provides proven economic, environmental, and performance benefits in building better roads and highways. For example:

- RMA is a proven cost-effective option as it increases pavement service life and reduces the need for road maintenance activities. This leads to significant cost savings compared to traditional asphalt.
- The use of RMA results in a 32% reduction of CO₂ emissions and lower energy consumption over the lifetime of a pavement as compared to traditional asphalt².
- RMA provides road performance benefits that include longer service life, less road spray in wet conditions, increased skid resistance, significant noise reduction, and better ride quality.

RMA has been utilized in many states, including California, Kentucky, and New York, to rebuild America's roadways with a resilient pavement solution. Use of RMA advances the circular economy, as asphalt is one of the most recycled materials and can be picked up and utilized again and again.

The economic and performance benefits of RMA are clear and well demonstrated. Congress can and should:

- 1) Identify RMA as a preferred pavement material;
- 2) Assist states to adopt RMA integration for local projects; and
- 3) Conduct research to add to existing knowledge³ of the benefits of RMA use, including research to supplement the preliminary findings of the reductions in environmental impact when using RMA.

2. Invest in research regarding the use of tire derived aggregate (TDA) in stormwater infiltration galleries.

Tire derived aggregate is made from recycled scrap tires and used as a cost-effective infill material in stormwater infiltration galleries. Stormwater infiltration galleries are already used as an important technology to clean stormwater. Stormwater infiltration galleries that utilize TDA allow for cost savings when compared to traditional mined minerals, such as gravel, since the lightweight recycled material costs less to transport.⁴ TDA also has a larger void space, providing the potential to capture greater water volume when compared to gravel. This allows for flexibility in design of stormwater infiltration galleries without compromising stormwater capture capacity where space is limited.

TDA may also provide a beneficial environmental impact when used in stormwater infiltration galleries. Studies show TDA successfully captures potentially harmful roadway runoff, including heavy metals, before it reaches groundwater.⁵ For these compelling benefits of cost-efficiency, effective performance, and environmental impact, USTMA urges Congress to incentivize research

² [The environmental impact assessment of Asphalt Rubber: Life Cycle Assessment. Bartolozzi et al. 2012.](#)

³ [State of Knowledge Report on Rubber Modified Asphalt. Buttlar 2021.](#)

⁴ <https://www.calrecycle.ca.gov/tires/greenroads/tda>

⁵ [Properties of Tire Derived Aggregate for Engineering Applications. Chandler 2013.](#)

into the use of TDA in stormwater infiltration galleries in federal, state, and local construction projects.

3. Invest in stormwater runoff research and fund efforts to mitigate the environmental effects of roadway runoff nationwide.

To ensure stormwater is protected as a valuable resource, we encourage additional research to assess stormwater runoff from roadways to increase the state of knowledge on constituents in roadway runoff, the potential impact of roadway runoff on the environment, and effective strategies to treat roadway runoff. We encourage additional research and investment in deployment of existing technologies that filter out pollutants before they enter our waterways. Stormwater basins, bioswales, street sweeping, and public awareness campaigns are proven ways to reduce pollutants from the roadway.

4. Incentivize the use and U.S. manufacturing 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. Each retreaded tire reduces energy consumption, CO₂ emissions, raw material usage, and tire disposal challenges and creates local job opportunities. Despite these advantages, retreading of commercial tires has steadily decreased over the last 25 years, due primarily to cheap foreign alternatives, which are 65% less likely to be retreaded⁶ because of their design and construction.

USTMA encourages Congress to provide financial incentives to help level the playing field and shift the business model back in favor of retreading. This could be accomplished through a per-tire manufacturing grant to tire retreaders or as a tax credit to purchasers of retreaded tires.

Furthermore, 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. USTMA notes there is precedent for such policies, including provisions in the Federal Vehicle Repair Cost Savings Act of 2015 that mandated the use of remanufactured replacement parts on federal fleet vehicles and a 1991 EPA procurement guideline under President George H.W. Bush that required the use of retreaded tires on federal fleet vehicles where practicable.

5. Incentivize the use of low rolling resistance tires for public and private use.

Low rolling resistance tires are proven to increase fuel economy and decrease environmental impact. A 1 to 2 percent increase in the fuel economy of passenger and light truck vehicles through the use of low rolling resistance tires would save about 1 billion to 2 billion gallons of fuel per year of the 130 billion gallons consumed by all consumer vehicles.⁷ Low rolling resistance tires allow fuel efficiency savings to be passed on to each driver and reduce the CO₂ emissions produced by each

⁶ [Retread Tires in the U.S. and Canada, A Joint Report, July 2018.](#)

⁷ <https://www.nap.edu/catalog/11620/tires-and-passenger-vehicle-fuel-economy-informing-consumers-improving-performance>

equipped vehicle. Congress should lead the way in expanding the use of low rolling resistance tires by incentivizing, where practical, fuel-efficient tires so we can all be a part of the effort to reduce CO₂ emissions.

6. Ensure 100% of tires in the federal fleet enter circular and sustainable scrap tire markets.

76% of scrap tires generated in 2019 were consumed in beneficial end-use markets. As demonstrated through the few policy suggestions above, there are myriad uses of scrap tires that can prevent them from ending up in landfills or illegal dump sites. USTMA and its members share the goal that all scrap tires enter sustainable and circular end-use markets, and we believe the federal government can contribute to that mission. We urge Congress to adopt a policy that mandates every tire in the federal fleet enter circular scrap tire markets. When paired with greater use of retreads, such a policy would reduce waste and contribute to the effort in reaching our shared environmental and sustainability goals.

U.S. tire manufacturers are a critical part of the American economy, and our members are committed 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. From engineering innovations that reduce CO₂ emissions to enhancing tire safety and performance, driving progress in workplace safety and preserving the environment throughout the life cycle of a tire, our members are continually looking for new ways to improve the societal contributions of their products and operations.

We look forward to continuing our work together. For more information, please contact Sean Moore, USTMA's Director of Government Relations, at (202) 682-4861 or smoore@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 Robin Carnahan, Administrator, U.S. General Services Administration
The Honorable Gina McCarthy, 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, United States Senate
Members, United States House of Representatives