May 24, 2021

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: U.S. Tire Manufacturing Infrastructure Priorities

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

On behalf of the U.S. Tire Manufacturers Association (USTMA)[1], I write to extend our gratitude for your leadership in ensuring our nation's ailing infrastructure meets the needs of the 21st Century. As Congress negotiates the breadth and depth of the infrastructure package, we respectfully urge you to include policies that ensure our nation's infrastructure is designed to meet important sustainability and resiliency goals in addition to supporting future mobility systems.

Tire manufacturing is an essential industry that directly supports more than a quarter million U.S. jobs across every congressional district in the country. Our 13 member companies produce 85% of the tires sold in the United States and are committed to upholding tire safety standards and market circularity. As such, there are several ways in which Congress and the tire industry can collaborate to meet our shared objectives.

To ensure our nation's roadways have the capacity to keep pace with advancing technologies, we urge you to:

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 has been shown to be a 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.

[1] USTMA is the national trade association for tire manufacturers that produce tires in the United States. Our 13 member companies operate 57 tire-related manufacturing facilities in 17 states, making mobility possible.

- The use of RMA results in a 32% reduction of CO_2 emissions and lower energy consumption over the lifetime of a pavement as compared to traditional asphalt[2].
- 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 material;
2) Assist states to adopt RMA integration for local projects; and
3) Create an innovation hub to conduct research to add to existing knowledge 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 is used as a cost-effective infill material in stormwater infiltration galleries. Stormwater infiltration galleries are already used as important technologies to clean stormwater. The use of stormwater infiltration galleries that utilize TDA allows for cost savings when compared to traditional mined minerals since the lightweight recycled material costs less to transport. TDA also has a larger void space than gravel and therefore provides more water volume capture potential when compared to gravel. This allows stormwater infiltration galleries to be constructed 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 microplastics, and heavy metals before they reach groundwater. Congress should incentivize research into the use of TDA in stormwater infiltration galleries in federal, state, and local construction projects.

3. Incentivize the use and U.S. manufacturing of retreaded tires for commercial vehicles to enhance sustainability and grow American jobs.

Tire retreading is a prime example of economically beneficial product recycling. Each retreaded tire creates local jobs and reduces energy consumption, CO_2 emissions, raw material usage, and tire disposal challenges. However, over the last 25 years, retreading of commercial tires has steadily decreased due to cheap foreign alternatives, which are 65% less likely to be retreaded[3] because of their design and construction.

[2] *The environmental impact assessment of Asphalt Rubber: Life Cycle Assessment*. Bartolozzi et al. 2012.
[3] Retread Tires in the U.S. and Canada, A Joint Report, July 2018.

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 done through a $30 per tire manufacturing grant to tire retreaders or an offset of the Federal Excise Tax to benefit tire purchasers.

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 executive action issued by President George W. Bush that required the use of retreaded tires on federal fleet vehicles where practicable.

4. 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.[4] Low rolling resistance tires allow fuel efficiency savings to be passed down to each driver and reduce the CO_2 emissions produced by each 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 CO_2 emissions.

5. 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 ensure the United States reaches 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 CO_2 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.

[4] https://www.nap.edu/catalog/11620/tires-and-passenger-vehicle-fuel-economy-informing-consumers-improving-performance

We look forward to working with you. 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 Katy Kale, Acting 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