June 8, 2021

The Honorable Peter DeFazio  
Chairman  
House Committee on Transportation and Infrastructure  
Washington, D.C. 20515

The Honorable Sam Graves  
Ranking Member  
House Committee on Transportation and Infrastructure  
Washington, D.C. 20515

RE: INVEST in America Act of 2021

Dear Chairman DeFazio and Ranking Member Graves:

On behalf of the U.S. Tire Manufacturers Association (USTMA), I would like to thank you and your staff for your hard work and dedication to addressing America’s infrastructure needs. We recognize the good faith effort brought forth by both parties to achieve our shared goals on resiliency and sustainability. Representing 13 of the world’s largest tire manufacturers, USTMA is deeply invested in efforts to improve the performance and sustainability of our roads and highways to help the country achieve important environmental objectives and expand our nation’s scrap tire markets. As such, the USTMA supports several provisions within H.R. 3684, the “INVEST in America Act of 2021,” which align with both the Committee’s and our industry’s priorities, especially those regarding rubber modified asphalt and tire derived aggregate.

Several sections of the INVEST in America act supported by USTMA include:

1. **Accelerated Implementation and Deployment of Pavement Technologies**

   USTMA recognizes the need for innovative pavement designs, materials, and practices to be used on a wider scale. Modern pavement materials like rubber modified asphalt have enormous potential to increase road durability and vehicle efficiency. Rubber modified asphalt utilizes ground tire rubber made from scrap tires in the asphalt binder to produce a resilient pavement solution. The use of rubber modified asphalt can result in a 32% reduction of CO₂ emissions and lower energy consumption over the lifetime of the pavement as compared to traditional asphalt. Furthermore, rubber modified asphalt 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. This provision will help expand rubber modified asphalt use across the country and advance road durability.

2. **Sense of Congress Supporting Life Cycle Cost Analysis of Future Infrastructure Projects**

   Use of ground tire rubber in asphalt has been shown to provide 43% savings in life cycle cost and 40% savings in maintenance costs over the life span of a given road. Rubber modified asphalt is
more cost effective than conventional asphalt, and with Congress’s support, we believe more states will be inclined to seek out rubber modified asphalt for their infrastructure projects given the substantial return on investment.

3. **Stormwater Best Management Practices**

USTMA supports funding for resilience improvements under this provision and the application of funds for the construction of technologies that clean stormwater, such as use of stormwater infiltration galleries. Stormwater infiltration galleries are patches of material through which stormwater flows before entering a storm drain. Use of tire derived aggregate, or large shreds of scrap tires, in stormwater infiltration galleries has been shown to provide significant benefits in reducing pollutants entering stormwater in urban areas. CalRecycle research found that galleries made with tire derived aggregate reduce stormwater pollutants such as zinc and iron by 80%. Incorporating tire derived aggregate into future stormwater infiltration projects will ensure stormwater in the U.S. is managed as a valuable water resource. Since tire derived aggregate has a larger void space than gravel, it provides more water volume capture potential. This also allows stormwater infiltration galleries to be constructed where space is limited, as is the case in most cities.

The three provisions outlined above are just a few of the programs included in the INVEST in America Act that U.S. tire manufacturers believe will contribute to our mission that all scrap tires enter sustainable and circular end-use markets. With 260 million scrap tires generated in the United States each year, these policies are essential to reducing waste and ensuring the United States reaches our shared environmental and sustainability goals. We are pleased the committee is working to adopt these changes and look forward to working with you to further our shared mission.

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