



# South Coast Air Quality Management District

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May 22, 2009

Mr. James Goldstene  
Executive Officer  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. Goldstene:

**Support for Proposed Revisions to On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles and Engines and Heavy-Duty Engines On-Board Diagnostic System Requirements, and Enforcement Provisions for Heavy-Duty Engines On-Board Diagnostic System Requirements**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to provide comments on the California Air Resources Board's (ARB's) proposed amendments to the On-Board Diagnostic Requirements for Light-, Medium- and Heavy-Duty Engines and its proposed adoption of Title 13 Section 1971.5 – Enforcement of Malfunction and Diagnostic System Requirements for 2010 and Subsequent Model-Year Heavy-Duty Vehicles and Engines (HD OBD).

The AQMD staff supports the California Air Resources Board's (CARB) continuing efforts in developing on-board diagnostic (OBD II) requirements for vehicles operating in California. The AQMD staff recognizes OBD II as the primary monitoring and enforcement tool in identifying and monitoring in-use emissions from light-, medium-, and heavy-duty vehicles. OBD II has proven to be extremely valuable in ensuring that continuous and life-cycle performance standards for light/medium duty engine and emission control systems are met. We strongly believe that OBD II requirements for heavy-duty vehicles will be of even greater importance given that these vehicles are not subject to an inspection and maintenance program.

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The AQMD staff supports the CARB staff's proposal to develop and implement a heavy-duty OBD-specific enforcement regulation comparable to the program in place for light- and medium-duty OBD II. The AQMD staff is encouraged by the proposed adoption of Section 1971.5 for in-use enforcement and believes this regulation adequately addresses in-use testing of OBD systems and provides CARB with authority to discourage the use of system defeat devices as previously experienced with some heavy-duty diesel engine manufacturers.

We appreciate the opportunity to provide comments and support for the proposed regulatory revisions. We urge the CARB Board to adopt the proposed revisions and enhanced enforcement provisions at its May 28, 2009 meeting. If you have any questions, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Source Division, Science and Technology Advancement, at (909) 396-3184.

Sincerely,



Barry R. Wallerstein, D.Env.  
Executive Officer