

Comment 1 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Katie

Last Name: Little

Email Address: klittle@cfbf.com

Affiliation: CA Farm Bureau

Subject: Comments to Proposed Heavy-duty Inspection and Maintenance (HD I/M) Regulation

Comment:

Letter attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-hdim2021-WzNSMFxwWWNVPlcI.pdf>'

Original File Name: HD-IM Regs (10.15.21).pdf

Date and Time Comment Was Submitted: 2021-11-24 16:17:12

No Duplicates.

Comment 2 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Kevin

Last Name: Brown

Email Address: kbrown@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on HD IM Proposal

Comment:

Comments attached in file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-hdim2021-VThRMIw+VGZVDAJh.pdf>'

Original File Name: MECA Comments CARB HD IM 261121.pdf

Date and Time Comment Was Submitted: 2021-11-26 08:30:44

No Duplicates.

Comment 3 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association in California

Subject: Health & Medical Coalition support for HDIM

Comment:

Please see the attached letter on behalf of health and medical organizations supporting a strong HDIM program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-hdim2021-UTkAY1w8VGsFdwdv.pdf>'

Original File Name: Health Group HDIM Sign-On Letter_Final.11.29.21.pdf

Date and Time Comment Was Submitted: 2021-11-29 13:12:58

No Duplicates.

Comment 4 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Nick

Last Name: Chiappe

Email Address: nchiappe@caltrux.org

Affiliation:

Subject: ATA and CTA Comments to Proposed Heavy-Duty Inspection and Maintenance Regulation

Comment:

Attached are the American Trucking Associations (ATA) and the California Trucking Association's comments on the Proposed Heavy-Duty Inspection and Maintenance Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-hdim2021-UztQMwZmV3IKdQFe.pdf>'

Original File Name: Heavy Duty IM Comments 112921.pdf

Date and Time Comment Was Submitted: 2021-11-29 14:15:48

No Duplicates.

Comment 5 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Julia
Last Name: Randolph
Email Address: julia@ccair.org
Affiliation: Coalition for Clean Air

Subject: Re: Adopt Heavy-Duty Inspection & Maintenance Rule Implementing SB 210 (Leyva)
Comment:

Group letter for comment attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-hdim2021-VyNcKFcjADABbAZZ.pdf>'

Original File Name: Truck SmogCheck group sign-on comments to ARB.pdf

Date and Time Comment Was Submitted: 2021-11-29 14:33:13

No Duplicates.

Comment 6 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Janet

Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on the Proposed HD I/M Regulation

Comment:

Please find attached comments from the California Council for Environmental and Economic Balance (CCEEB) on the proposed Heavy-Duty Inspection and Maintenance (HD I/M) Regulation. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-hdim2021-U2FTZQMwVjRReQAx.pdf>'

Original File Name: 2021.11.29 CCEEB_HDIM proposed reg.pdf

Date and Time Comment Was Submitted: 2021-11-29 16:46:03

No Duplicates.

Comment 7 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Catherine

Last Name: Boland

Email Address: cboland@mema.org

Affiliation: MEMA

Subject: AASA Comments on HD Inspection and Maintenance

Comment:

Please find the attached comments submitted on behalf of AASA.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-hdim2021-B2YGYQd1VWcBWANG.pdf>'

Original File Name: AASA Comments to CARB HD Inspection and Maintenance Final 11.29.2021.pdf

Date and Time Comment Was Submitted: 2021-11-29 17:16:32

No Duplicates.

Comment 8 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Scott
Last Name: Sutarik
Email Address: scottsutarik@geotab.com
Affiliation: Geotab

Subject: Comments: Proposed HD I/M Regulation

Comment:

Comment letter attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-hdim2021-WzhdOlwvUGFQCQBf.pdf>'

Original File Name: CARB_HD I_M Comment Submission 11.29.2021.pdf

Date and Time Comment Was Submitted: 2021-11-29 19:20:24

No Duplicates.

Comment 9 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 45 Day.

First Name: Tia

Last Name: Sutton Sysounthorn

Email Address: tsutton@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments on the Proposed HD I/M Regulation

Comment:

Attached are comments of the Truck and Engine Manufacturers Association on the proposed Heavy-Duty Inspection and Maintenance Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-hdim2021-AGVUPwRkWVVXMgFu.pdf>'

Original File Name: EMA Comments re CARB Proposed HDIM Regulation.pdf

Date and Time Comment Was Submitted: 2021-11-29 20:08:04

No Duplicates.

Comment 1 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association

Subject: Health & Medical Coalition support for HDIM

Comment:

Please see attached letter of support from over 25 health and medical organizations in support of a strong HDIM program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-hdim2021-AmpRMgBgVGtRI1I6.pdf>

Original File Name: Health Group HDIM Sign-On Letter_Update 12.9.21.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:24:42

No Duplicates.

Comment 2 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Theresa

Last Name: Romanosky

Email Address: tromanosky@aar.org

Affiliation:

Subject: AAR Comments on Proposed Heavy Duty Inspection and Maintenance Requirements

Comment:

Attached please find comments from the Association of American Railroads on the Proposed Heavy Duty Inspection and Maintenance Program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-hdim2021-BzYCNgEwVzxXYwIy.pdf>

Original File Name: 12082021 AAR Comments on CARB IM Regulation.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:40:11

No Duplicates.

Comment 3 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Industry Air Quality Coalit

Subject: HDVIMP comments

Comment:

Attached are the comments i will be presenting today.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-hdim2021-UjFdMgdnV3VVMAFe.docx>

Original File Name: CIAQC CARB testimony HDVIMP.docx

Date and Time Comment Was Submitted: 2021-12-09 08:51:09

No Duplicates.

Comment 4 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Tia

Last Name: Sutton Sysounthorn

Email Address: tsutton@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: December 9, 2021 EMA Oral Statement re CARB HDIM Proposed Regulation

Comment:

Attached is the oral statement of the Truck and Engine Manufacturers Association regarding the HD I/M Proposed Regulation presented during the December 9, 2021 Board hearing.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-hdim2021-Vm8AWQFkUWcGYwdY.pdf>

Original File Name: 9 Dec 2021 EMA Oral Statement re CARB Proposed HDIM Regulation_.pdf

Date and Time Comment Was Submitted: 2021-12-09 08:51:22

No Duplicates.

Comment 5 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Thomas
Last Name: Jelenic
Email Address: tjelenic@pmsaship.com
Affiliation: PMSA

Subject: HD I/M Commnets

Comment:

Please find attached comments on the Proposed Heavy-Duty Inspection and Maintenance Regulation.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-hdim2021-UCABalwuVWcBWFMw.pdf>

Original File Name: PMSA Comment Letter HD I.M 12.8.21.pdf

Date and Time Comment Was Submitted: 2021-12-09 09:09:14

No Duplicates.

Comment 6 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Ed

Last Name: Ward

Email Address: ed.ward@vpps.net

Affiliation:

Subject: HD/IM

Comment:

HD/IM Adoption

On behalf of my family and grandchildren I want to thank Chair Randolph and the CARB board for the legacy work to clean up our air. As a child of the 60's I lived through very poor air quality. Incrementally I have invested thousands of dollars over the years to partner with CARB in reducing vehicle air pollution.

Zero emission vehicles provide us the best choice to deliver the highest air quality to our children. But I fear in the single choice to go electric and the constant assault on near zero emission alternatives overlook the value of biomass liquid fuel as biodiesel, renewable diesel and renewable compressed natural gas which provide significant emission reductions when run in new technology engines. HD/IM will be putting unnecessary burdens on our children and economically challenged. It is these individuals who will be most affected by the unavoidable increases in cost of goods and transportation.

HD/IM as it will be presented today will cripple the movement of goods in CA. and is another layer of regulation in a cornucopia of existing regulations that is unnecessary. The use of existing regulations to monitor and enforce truck operational standards is sufficient.

To replace the estimated 1.6 million HD trucks in CA by 2030 would require 685 trucks a day be produced to meet the 2030 deadline and 256 trucks a day to meet the 2045 requirement. These facts along with our power grid estimated need to be a minimum of 4 times larger than we have today pose a huge challenge ahead for all who value clean air.

I would ask that CARB staff continue to hold additional HD/IM Workshops along with developing a larger pilot study over the next two years to assure that families and freight costs will not become victims of HD/IM. This additional time will allow CARB time to validate studies regarding emissions reduction. Ultimately allowing advanced technology to assist in developing a smoother transition to electric/hydrogen vehicle use.

As a lifelong partner in the development of cleaner air across CA. We have come a long way since the 60's. The necessity to adapt HD/IM at this time needs more time to mature... to assure the best pathways are chosen and new technologies have time to be implemented.

Thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-hdim2021-W2pdaQQ1UzkFMVBg.docx>

Original File Name: 12092021 HD-IM Response to CARB board.docx

Date and Time Comment Was Submitted: 2021-12-09 09:47:42

No Duplicates.

Comment 7 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: SEAN

Last Name: EDGAR

Email Address: SEAN@CLEANFLEETS.NET

Affiliation:

Subject: WSTA Comments on Proposed HD Inspection/Maintenance Regulation

Comment:

Please see attached comments for consideration at today's board meeting.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-hdim2021-UCdXIl0oU2EAWQBj.pdf>

Original File Name: WSTA Comments on HD IM Item 21-13-1.pdf

Date and Time Comment Was Submitted: 2021-12-09 10:02:31

No Duplicates.

Comment 8 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Richard

Last Name: Frank

Email Address: rmfrank@ucdavis.edu

Affiliation:

Subject: CARB Comment Letter

Comment:

Please accept the attached comment letter for consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-hdim2021-B2RXMF0uBDVWDwBj.pdf>

Original File Name: CARB Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-12-09 10:44:44

No Duplicates.

Comment 9 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Tia

Last Name: Sutton Sysounthorn

Email Address: tsutton@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Supplemental Written Comments on Proposed HDIM Regulation Appendix B

Comment:

Attached are Supplemental Comments of the Truck and Engine Manufacturers Association on Appendix B of the Proposed HD I/M Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-hdim2021-VTAGbQRkUl5SJ1ci.pdf>

Original File Name: EMA Supplemental Comments re CARB Proposed HDIM Regulation Appendix B.pdf

Date and Time Comment Was Submitted: 2021-12-09 11:02:08

No Duplicates.

Comment 10 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Mitchell

Last Name: Domingos

Email Address: mitchd40@yahoo.com

Affiliation:

Subject: SORE Comment

Comment:

Hello my name is Mitchell Domingos and thank you for the opportunity to share. I have represented power equipment manufactures in northern ca for 20 years. Air quality is very important for the future of California. The Carb example used at the beginning of this meeting stated that using a blower for 1 hour is equivalent to driving to Colorado, the blower used in this example is only available in ca because of emission credits and well over CARBs Emission standard. While according to CARB's website many CARB certified engines are well below Carb Standard.

If we really would like to reduce emissions, end the emission credit system to remove those dirtier engines giving our industry a poor image. And let the transition to battery happen organically, letting technology improve and cost to reduce.

Roughing into ZEE could do more harm than good if forced.

I'll give you an example of when a Bay Area City banned backpack blower due to noise. Landscapers still needed to continue beautifying landscape, after the ban landscapers towed generators on little carts with a corded electric blower plugged in. Actually creating more noise using a generator than the previous blower. Because they roughed into the ban of blowers without a solution. I fear roughing into ZEE could do more harm than good to environment.

I suggest removing the emission credits and evaluate resident product as CARB had identified 85% of the issues revolves around consumer products.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 12:56:32

No Duplicates.

Comment 11 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021). (At Hearing)

First Name: Michael
Last Name: Lewis
Email Address: mike@lewisandco.net
Affiliation: Construction Industry Air Quality Coalit

Subject: HDVIMP

Comment:

December 2, 2021
California Air Resources Board
1001 I Street
Sacramento, CA 95814
RE: PROPOSED HEAVY DUTY VEHICLE INSPECTION AND MAINTENANCE
PROGRAM
Submitted Electronically -
<https://www.arb.ca.gov/lispub/comm/bclist.php>
Dear Chair Randolph and Members of the Board:
The Construction Industry Air Quality Coalition is composed of the
membership of
the major construction organizations in California including the
Associated General
Contractors, Building Industry Association of Southern California,
Engineering
Contractors Association, Southern California Contractors
Association, San Diego Associated General Contractors, United
Contractors, and the Western States Trucking
Association. Collectively these Associations represent 20,000
contractors employing
over 400,000 construction workers.
Our industry has over 100,000 trucks affected by this proposed
regulation.
THE PROGRAM IS TOO COSTLY.
The construction industry had serious reservations about SB210
while it was being
considered by the legislature because it proposed a costly new
requirement on fleets
without an apparent need and with little concern given to the cost
of compliance for
fleet owners. Those concerns continue today. The \$30/vehicle
initial fee for the
compliance certificates proposed in the legislation does not
include the cost of
employee training and the testing, recordkeeping, and reporting
required by this
regulation. In fact, there is no limit on the cost to the fleet or
truck owner. Fleets will
be required to purchase a dongle to extract data and subscribe to a
service to be able
to access telematics. Because there appears not to be a universal
dongle, more than
one will be required for each manufacturer. The real reporting cost
per truck could be
several hundred dollars.

For those fleets that would choose to use the state testing stations, there is no limit established on the cost of those tests. Nor are there testing stations established to provide the service. Such a testing scheme would require both the truck and an operator to be out of service for the testing period adding further to the cost of compliance. For those fleets that may use their in-house technicians, the company will need to buy the annual software from each vehicle OEM in order to access the vehicle ECM. In talking with current PSIP testers, the cost for each OEM's annual subscription runs from \$2,000 to \$4,000 per computer, so a site with multiple technicians will be quite costly. For companies with multiple sites with multiple technicians spread out throughout California, each site that does the testing in-house will be subject to software subscriptions. For a company that runs 8 different OEM type vehicles, the costs per site are enormous and outrageous compared to the current smoke test program.

In reviewing the cost data, we were shocked that the initial reporting was estimated at 5 minutes per vehicle. What was not accounted for was the time spent physically gathering the data. CARB states time would be saved by data from DMV, but that is not feasible when the operator is leasing or renting the vehicle. CARB assumes a cost savings for large fleets doing testing in-house, but as already pointed out, the software alone makes that option cost prohibitive. This was not disclosed in any of the pilot programs. Finally, we found it odd that CARB equated a cost savings to PSIP sunsetting. Given the excessive costs associated with this proposed regulation, there would be no cost savings.

TWICE-A-YEAR TESTING IS EXCESSIVE

We also believe that two tests a year is excessive and adds unnecessarily to the cost of compliance when CARB's own data demonstrate that the vast majority of trucks are in compliance with the existing standards. Vehicles running with the MIL light on will derate and finally shut down within a short period, so what is the real reason behind requiring more tests than the annual smoke test? Is CARB looking for manufacturers' data at the expense of the end user? Owners must repair the vehicle engine issues as soon as possible in order to continue running their business.

THE PILOT PROGRAM WAS INSUFFICIENT

Rather than pilot their proposed program, CARB tested devices and experimental technologies. They did not test the effort needed to meet the requirements of the regulation. Nor did they thoroughly examine the time and cost required to acquire and report the data utilizing the methods required by the regulation. Nor does it appear that the pilot program was ever submitted to the legislature for their review as required.

CARB HAS IGNORED IMPORTANT REQUIREMENTS OF SB 210

SB 210 proposed a "streamlined process" for reporting. The proposed reporting process is not streamlined and envisions the cooperation of two state agencies (CARB and DMV) in the registration process. CARB is also

proposing a requirement that the subject vehicles be tested based upon the DMV registration period instead of on the calendar year basis in effect since 2010 when AB1922 amended Health and Safety Code section 43701 allowing the testing period to be on a calendar year for smoke tests for ease of fleet management. Prior to that was a rolling 365 days and that was a nightmare in managing to stay in compliance. The OBD is related to PSIP (in fact still requires smoke tests for 2013 and older vehicles), so without legislation changing the Health and Safety Code, it is unclear how CARB can now deviate requiring testing in anything other than a calendar year. For the rental industry, let alone any owned vehicles in large fleets, having different 90-day windows for every vehicle will be a nightmare to track and will ultimately lead to a high probability of inadvertent missed testing date windows. SB 210 envisioned "minimized costs". Given the time required to drive to and from a Kiosk, or schedule a mobile service twice a year, there is no way the cost per truck will not greatly exceed the low costs outlined in the legislation, let alone the costs compared to the current PSIP program that run between \$75 to \$150 per vehicle.

LARGE FLEET REPORTING MAINTENANCE POSES A RISK TO ENFORCEMENT
Reporting for large fleets with multiple sites will be difficult to manage reporting purchases and sales within a 30-day window, especially with fleet purchases that are managed separately at each location. We are concerned with the high potential of fleets inadvertently missing the 30-day window, only to be handed a notice of violation and a fine. We ask to Governing Board to consider warnings instead of violations for this administrative error.

LEVEL PLAYING FIELD?

We are quite concerned with how the program will be enforced for companies that lease their vehicles through out of state leasing companies where those vehicles are not registered in California. Given the number of out of state vehicles (and California registered vehicles) still running noncompliant under the truck and bus regulation, we do not see how this regulation can be properly enforced to ensure those operating in the state legally will be on a level playing field as required by SB210. Noncompliant vehicles are not being stopped by CHP at the borders.

CONSTRUCTION RENTAL COMPANY ISSUES

We are concerned with how a rental company will be able to manage the vehicles that are out on rent for a period extending into a single to multiple testing windows. The rental companies typically have no idea where the vehicles are being used so testing would not be possible by the rental company. Additionally, when the vehicle is out on rent a rental company has no idea if or when a MIL light might come on unless the renter contacts the rental company.

Any delay in contact between the renter and the rental company could delay timely repairs and inappropriately subject the rental company to potential enforcement. There must be a provision in the HD I/M that allows for an exception to the test interval if the vehicle is out on rent across a test window. We suggest the rental company vehicles be subject to the testing a single time during a calendar year (again the annual interval should remain a calendar year versus a DMV registration year due to the conflict with the Health and Safety Code).

REQUIRING ENFORCEMENT BY PRIVATE COMPANIES

The regulation requires freight contractors and brokers, which includes "any person," verify that vehicles owned by third parties comply with regulation and maintain records to that effect. This requirement is pointless for trucks registered in California because such trucks cannot be registered if they do not comply with the HDVIM program.

Such a requirement should only apply to trucks not registered by DMV in California. Limiting the application to trucks registered out of state not only makes rational sense, but it also provides a small benefit to California registered truck owners.

We would encourage your Board to return this proposed rule to the staff and direct that they address these serious weaknesses in the framework. We are ready to collaborate with the staff to craft a rule that is fair to California fleets and achieves the goals of reducing air pollution while keeping our economy on a successful path to recovery.

Sincerely,

Michael Lewis, Senior Vice President
Construction Industry Air Quality Coalition
951-206-4420

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-hdim2021-BWYFallyBScKb1QL.pdf>

Original File Name: CIAQC Comment Letter- HDVIMP-1.pdf

Date and Time Comment Was Submitted: 2021-12-09 15:00:45

No Duplicates.

Comment 1 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Douglas
Last Name: Grote
Email Address: DOUG@BECARBCOMPLIANT.COM
Affiliation: BECARBCOMPLIANT

Subject: Proposed Heavy-Duty Inspection and Maintenance Regulation

Comment:

<p>I stand against this proposed regulation. The requirement does not bode well with the technology available.</p><p class="MsoNormal">I am a certified opacity tester and know first hand the manufactures do not have the ability yet to test only the emissions required per the regulation from OBD.</p><p class="MsoNormal">I am also aware the DMV does not have capability now to accept downloads from vehicles over 14,000 GVWR.</p><p class="MsoNormal">I stand against this proposed regulation because the enforcement is nonexistent. It will only catch the companies doing their best to comply with the regulation while other's outside of California will be able to go for years before being caught</p><p class="MsoNormal">The proposal to increase the testing from 2 times in 2023 and then 4 times per year after is ridiculous and will require owners to have their vehicles tested more than actually working.</p><p class="MsoNormal"> </p><p class="MsoNormal"> It is time that California stands to clean the air AND help the business communities by removing this requirement</p><p class="MsoNormal"> </p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-11 16:52:07

No Duplicates.

Comment 2 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Todd
Last Name: Spencer
Email Address: dec@cullenlaw.com
Affiliation: OOIDA, Inc.

Subject: Comments re Heavy-Duty Inspection and Maintenance Regulation
Comment:

<p>Attached please find OOIDA's comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-hdim2021-BjRda1NgBGVXfwU1.pdf>

Original File Name: 2022.05.26, OOIDA Comments re HDIM.pdf

Date and Time Comment Was Submitted: 2022-05-26 13:11:03

No Duplicates.

Comment 3 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Todd
Last Name: Spencer
Email Address: dec@cullenlaw.com
Affiliation: OOIDA, Inc.

Subject: Comments re Heavy-Duty Inspection and Maintenance Regulation
Comment:

<p>Attached please find OOIDA's comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-hdim2021-BzUHMVdkUzJVfQc3.pdf>

Original File Name: 2022.05.26, OOIDA Comments re HDIM.pdf

Date and Time Comment Was Submitted: 2022-05-26 13:11:03

No Duplicates.

Comment 4 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Will

Last Name: Barrett

Email Address: William.Barrett@Lung.org

Affiliation: American Lung Association

Subject: Comments on HDIM 15-Day proposal

Comment:

<p>Please see attached on behalf of American Lung Association and Coalition for Clean Air. </p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-hdim2021-WjtXPVY2VFgBZAdk.pdf>

Original File Name: ALA_CCA comments on HDIM 15 day 5.26.22.pdf

Date and Time Comment Was Submitted: 2022-05-26 12:59:18

No Duplicates.

Comment 5 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Michael
Last Name: Lewis
Email Address: mike@lewisandco.net
Affiliation: Construction Industry Air Quality Coalit

Subject: HDVIMP

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-hdim2021-BmVVOVQ0WXsEYQIW.pdf>

Original File Name: CIAQC HDVIMP - 15 day comments.pdf

Date and Time Comment Was Submitted: 2022-05-26 15:07:59

No Duplicates.

Comment 6 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Julie

Last Name: Smith

Email Address: raynjulie1048@sbcglobal.net

Affiliation:

Subject: Clean Air/Clean Cars

Comment:

<p>Please support clean cars to help air to be clean in California.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 16:33:32

No Duplicates.

Comment 7 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Tia

Last Name: Sutton Sysounthorn

Email Address: tsutton@emamail.org

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments on HD I/M 15-Day Notice

Comment:

<p>Attached are comments of the Truck and Engine Manufacturers Association (EMA) on the Proposed Heavy-Duty Inspection and Maintenance Regulation "Notice of Public Availability of Modified Text and Availability of Additional Documents and Information".</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-hdim2021-UjdROIY2VFgHYgBv.pdf>

Original File Name: EMA Comments on CARB HDIM Regulation 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2022-05-26 17:54:01

No Duplicates.

Comment 8 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Carl

Last Name: Finster

Email Address: carl.finster@cox.net

Affiliation:

Subject: Proposed Heavy-Duty Inspection and Maintenance Regulation

Comment:

<p>As a small, one-man trucking company, this bill, as written, will put me out of business. There are many more like me. Please reconsider elimination of the low-mileage provision and the lack of extension for unavailability of parts.</p>

<p> </p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 19:43:29

No Duplicates.

Comment 9 for Proposed Heavy-Duty Inspection and Maintenance Regulation (hdim2021) - 15-1.

First Name: Nick

Last Name: Chiappe

Email Address: nchiappe@caltrux.org

Affiliation:

Subject: ATA and CTA's comments on the 15-Day changes to the Proposed HDIM Regulation

Comment:

<p>Attached are the American Trucking Associations (ATA) and California Trucking Association's (CTA) comments on the 15-day changes to the proposed Heavy-Duty Inspection and Maintenance regulation</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-hdim2021-AmpSMFY+BzlQCQlq.pdf>

Original File Name: HDIM Comments 05.26.22_Final.pdf

Date and Time Comment Was Submitted: 2022-05-26 20:11:47

No Duplicates.