

October 22, 2020

VIA ELECTRONIC SUBMITTAL

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Agenda Item 20-11-4: EHC supports advancing the Next Generation Heavy-Duty Vehicle Enforcement.

Dear CARB Chair and Boardmembers,

Environmental Health Coalition (EHC) is submitting comments to support advancement of the Next Generation Heavy-Duty Vehicle Enforcement System utilizing the Portable Emissions Acquisition System (PEAQS) and the Automatic License Plate Reader technologies for data driven heavy-duty vehicle enforcement efforts and to support the Heavy-Duty Inspection and Maintenance Program.

- EHC support the advancement of CARB's Portable Emissions Acquisition System for capturing emissions data through a much more efficient way by deploying this technology and automating processes. This is of extreme importance for our environmental justice communities of Barrio Logan, west National City and San Ysidro/Otay Mesa border area.
- We are glad that the program is advancing in the San Joaquin Valley, but we really need these systems at the border and at the port terminals.
- Even through COVID: Port of SD cargo volumes are down a little, or even up in the case of Dole; shipyards are still operating, and there is still truck traffic in the community as they are deemed an essential workforce – up to 4,000 trucks driving through Barrio Logan. Barrio Logan suffers from the highest levels of Diesel Particulate Matter in the State of California and in turn residents are continuously being exposed to Diesel PM from breathing diesel exhaust.
- For the Border area in Otay Mesa and San Ysidro: cross border commercial traffic is also considered essential and has been allowed to continue across the border.
- According to the San Diego Association of Governments (SANDAG) statistics for POE crossings in 2019, Commercial truck crossings through the Otay Mesa POE numbered approximately 800,000 trucks. This does not account for the 2 to 5 hours of idling that these trucks spend cued up at the border waiting to cross.
- Current San Diego Air Pollution Control District field inspections for heavy-duty trucks take a much greater amount of resources to perform and can only be performed as scheduled during district hours of operation.

- Our communities need much better enforcement to identify truck operators with the highest levels of emissions from diesel to do the right thing and understand the huge negative impact of running dirty trucks through the places where people live.
- EHC will continue to support and advocate that CARB make more funds available to deploy this technology faster in other critical areas of State.

Thank you and thanks to CARB staff for advancing this roadside emissions measurement system.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Flores". The signature is fluid and cursive, with a large initial "D" and a stylized "Flores".

David Flores
Air Quality Campaign Director