January 11, 2019

Mary Nichols

Chair, California Air Resources Board

1001 I Street

Sacramento, CA 94812

**Re: 15-day modifications to proposed amendments to California Emission Control System Warranty Regulations and Maintenance Provisions for New Heavy-Duty Diesel Engines, models 2022 and beyond.**

Dear Chair Nichols,

Heavy-duty diesel engines are major contributors to California’s mobile source emissions of oxides of nitrate (NOx) and fine particulate matter (PM2.5). These toxic fumes take a serious toll on our health and quality of life, particularly on those living in low-income communities heavily trafficked by freight-hauling diesel big rigs.

Since 2007, CARB has placed stringent NOx and PM 2.5 emission-reduction standards on all new diesel engines. Modernizing these engines with newer, capture-and-control technologies significantly cuts the release of these harmful pollutants. But when maintenance lags or when critical parts fail the reductions are lost.

It is for this reason that the Coalition for Clean Air supports the proposed 15-day amendment language to the California Emission Control System Warranty Regulations and Maintenance Provisions, applicable to 2022 model year diesel heavy-duty truck engines and subsequent models.

Important to CARB’s Mobile Source Strategy are measures to ensure that diesel-powered heavy-duty vehicles operate efficiently and cleanly as possible throughout their lifetime.

As earlier noted by CARB staff, current warranty periods are hardly adequate for modern heavy-duty trucks that can remain in operation for more than a million miles. A warranty that covers either five years, 100,000 miles or 3,000 hours of emissions, whichever comes first, can be exhausted in a year. Staff further noted that less than a third of owners repair vehicle emission-control parts beyond warranty unless gas mileage or performance is significantly reduced.

Extending warranties for heavy-duty diesel engines to 350,000 miles and increasing minimum allowed maintenance intervals as proposed not only makes sense from a clean-air and health perspective but also for consumer protection purposes.

Steps such as the warranty and maintenance regulation complement CARB’s on-going efforts to help the heavily polluted San Joaquin Valley and South Coast air basins achieve drastically needed NOx and PM2.5 reductions in order to reach attainment of federal air-quality standards.

Unrelated to the regulation considered in this letter but integral to improving the quality of air in California – arguably the most polluted in the nation – is the passage of a smog-check like program for heavy-duty diesel trucks as envisioned in last year’s SB 210 by Senator Connie Leyva, who is expected to reintroduce her measure this year.

Coalition for Clean Air is committed to advocating for regulations and legislation that provides clean-air relief to all Californians – especially those communities disproportionately impacted by air pollution – and looks forward to working with CARB in 2019 in this effort.

Thank you for your consideration.

Sincerely,

Rocky Rushing

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