



May 26, 2022

Krista Fregoso  
Air Pollution Specialist  
Mobile Source Control Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Comments on HDIM 15-Day Change Proposals**

Dear Ms. Fregoso:

On behalf of the American Lung Association and Coalition for Clean Air, we are writing to provide our organizations' support for the proposed 15-day changes to the Heavy-Duty Inspection and Maintenance (HDIM) program. Our organizations co-sponsored Senate Bill 210 (Leyva, 2019) and engaged throughout the development of the HDIM rules to ensure the greatest possible health protections are enacted.

Heavy-duty trucks are the leading source of ozone- and particle-forming NO<sub>x</sub> emissions in California. The American Lung Association *State of the Air* 2022 report found that 98 percent of Californians live in a community impacted by unhealthy air quality, and that California is home to six of the ten most ozone-polluted cities in the United States. The impacts of ozone and particle pollution on health are well documented, and the HDIM program is projected to save over 7,100 lives and generate public health benefits in excess of \$70 billion over the life of the program. These benefits will increase due to the proposed 15-day change package once approved and implemented.

In order to achieve greater pollution reductions and to save more lives through the HDIM program, we support the 15-day change package. Our organizations' key recommendation to increase testing frequency is included in this package to ensure excess emissions are identified and corrected more quickly to the benefit of public health. We note the importance of the following provisions in particular:

- ***Increased Frequency of Testing for OBD-Equipped Vehicles, Section 2196.1(d)(3):*** We support the increased frequency of testing vehicles with On-Board Diagnostic systems to four times per year after the third year of testing. This critical provision will yield additional emission reductions and public health benefits.

- **Clarification of Operator Requirements, Section 2196(a)(1) and Section 2196.1(a)(1-2):** We support the clarification and emphasis that operators are required to demonstrate compliance to legally operate in California, rather than simply obtain a certificate.
- **Identifying Excess Emissions from Off-Road Equipment, Section 2196.6:** We support the inclusion of the five percent opacity standard to ensure that DPF-equipped off-road equipment are properly maintained as well as to protect against excess emissions due to malfunctioning emission controls given properly functioning DPF-equipped engines operate below this opacity level.

Thank you for your consideration of our comments and for the continued attention to strengthening the original HDIM proposal to ensure greater public health protections against excess trucking emissions in California.

Sincerely,

Will Barrett  
National Sr. Director, Clean Air Advocacy  
**American Lung Association**

Bill Magavern  
Policy Director  
**Coalition for Clean Air**