



January 25, 2021

Jared Blumenfeld, Secretary
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

Keely Bosler, Director
State of California Department of Finance
State Capitol, Rm 1145
Sacramento, CA 95814

David S. Kim, Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Via email

Subject: Senate Bill 210 Heavy-Duty Inspection and Maintenance Program Implementation

Dear Secretary Blumenfeld, Director Bosler and Secretary Kim:

On behalf of the American Lung Association and Coalition for Clean Air, we are writing to call on your agencies to expedite the implementation of Senate Bill 210 (SB 210, Leyva, 2019) to reduce the unacceptable burdens posed by heavy-duty trucking pollution. Our organizations co-sponsored SB 210, which requires compliance with the Heavy-Duty Inspection and Maintenance (HD/IM) "Smog Check for Trucks" program for heavy-duty vehicles to be eligible for annual DMV registration for operation in California. ***We are deeply concerned that the public health benefits of HD/IM will not be realized for many years at the current rate of implementation and call on your agencies to fully implement the program in 2022.***

California's heavy-duty vehicle category is the leading source of smog- and particle-forming NO_x emissions in the on-road sector, adding to localized health burdens and to our worst-in-the-nation regional pollution challenges. According to the American Lung Association's *State of the Air 2020* report, California is home to seven of the ten most ozone-polluted cities in the United States and six of the ten most impacted by annual levels of particle pollution.¹ The respiratory and cardiovascular health impacts of ozone and particle pollution are well documented, including impacts to lung function and development, asthma attacks, heart attacks and strokes, and lung cancer.² The California Air Resources Board (CARB) estimates over 5,000 premature deaths per

¹ American Lung Association. *State of the Air 2020*. April 2020. <https://www.stateoftheair.org/city-rankings/most-polluted-cities.html>

² *Ibid.* <https://www.stateoftheair.org/health-risks/>

year in California due to particle pollution, half of which is linked to transportation.³ The burdens of unhealthy air – and heavy-duty trucking emissions in particular - fall particularly hard on our most vulnerable residents, including children, seniors, low-income communities and communities of color who are at higher risk for harm.

Similar to the light-duty Smog Check program, the creation and implementation of the HD/IM program will ensure that in-state and out-of-state trucks on California roads meet approved emissions levels in order to be registered to operate in California. The projected pollution reduction benefits of this program are substantial, equivalent to removing 375,000 diesel trucks' worth of particle pollution at the state level, while supporting attainment of health-protective standards in our most impacted regions. The HD/IM program represents the largest share of new emission reductions projected in the South Coast Air Quality Management District's 2019 ozone planning document update and is "one of the largest proposed near-term reduction measures" for the San Joaquin Valley's attainment efforts.^{4, 5}

Unfortunately, while CARB has been hosting stakeholder meetings over the past two years to introduce key design elements of the program, the HD/IM program is not slated for full implementation across the relevant agencies (CARB, Department of Motor Vehicles, California Highway Patrol) until 2024. This is an unacceptably long time for reducing the impacts of heavy-duty diesel trucks that are not operating in compliance with clean air standards. Simply put, the longer implementation of the HD/IM program is delayed or deferred, the longer Californians will pay the price for non-compliant trucks on our roads with their health.

In closing, we urge you to coordinate to bring the HD/IM program fully online in 2022 so that improved health for all Californians is not delayed. Please contact us with any questions at bill@ccair.org or william.barrett@lung.org.

Sincerely,

Will Barrett
Director, Clean Air Advocacy
American Lung Association

Bill Magavern
Policy Director
Coalition for Clean Air

cc:

Steve Gordon, Director, Department of Motor Vehicle
Liane Randolph, Chair, California Air Resources Board
Amanda Ray, Commissioner, California Highway Patrol

³ California Air Resources Board. *Draft 2020 Mobile Source Strategy*. p. 15. https://ww2.arb.ca.gov/sites/default/files/2020-11/Draft_2020_Mobile_Source_Strategy.pdf

⁴CARB. *South Coast Air Quality Management District 8-Hour Ozone SIP Strategy Staff Report* at p. 5. December 2019. <https://ww3.arb.ca.gov/planning/sip/planarea/scabsip/2019o3update.pdf>

⁵ CARB. Public Workshop: *Developing California's Senate Bill 210 Heavy-Duty Vehicle Inspection and Maintenance Program*. January 29, 2020. https://ww3.arb.ca.gov/msprog/HD/IM/meetings/20200129_HD/IM_workshop_presentation.pdf