



December 9, 2021

Liane Randolph, Chair
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Subject: Health Support for Strong Heavy-Duty Inspection and Maintenance Program

Dear Chair Randolph and Board Members:

On behalf of the undersigned health and medical professionals and organizations, we are writing to provide our strong support for the adoption of the California Air Resources Board's (CARB) proposed Heavy Duty Inspection and Maintenance (HDIM) program. This is the most health-protective measure that CARB has considered in over a decade to advance California's Clean Air Act responsibilities to protect public health. CARB must adopt the rule to ensure the lifesaving benefits of the rule begin to accrue in communities throughout California. The health and medical community were strong supporters of Senate Bill 210 (Leyva, 2019) and look to CARB to adopt this landmark rule to protect the health of all Californians, and especially those in communities most heavily burdened by truck pollution.

The Need for Heavy Duty Truck “Smog Check” to Protect Health

Despite only making up a small percentage of vehicles on California roads, heavy-duty trucks generate over half of the on-road emissions of ozone- and particle-forming Oxides of Nitrogen (NOx) and over half of on-road fine particle pollution (PM2.5).¹ California cities dominate the lists of the most polluted in the United States for both ozone and particle pollution, with seven and six of the top ten, respectively.² Breathing ozone and particle pollution contribute to a wide range of poor lung, heart and cancer outcomes, among others. CARB estimates that particle pollution contributes to approximately 5,000 deaths annually in California, half of which are related to transportation pollution.³ Low-income communities, people of color, children, seniors, and those living with lung and heart illnesses are most at risk to the impacts of unhealthy air. Further, low-income communities and communities of color face disproportionate exposures to transportation pollution and associated health impacts.⁴ This regulation will play a key role in improving the health of Californians living near ports, railyards, warehouses, freeways, and other high-truck traffic areas.

Ensuring Real-World Pollution Controls to Protect Health

The HDIM proposal will require trucks operating in California to undergo periodic emissions testing and demonstrate compliance with specified emissions performance as a condition for operating in California. Similar to the light-duty “Smog Check” program, the HDIM program will protect the health of the public, especially those in highly impacted communities, from excess, harmful on-road pollution. CARB, the Department of Motor Vehicles, and the California Highway Patrol will coordinate to implement the inspection, registration, and enforcement elements of the program. The program requires compliance from out-of-state vehicles to ensure an even playing field for California truck operators. The program provides limited exemptions and flexibilities to ensure maximum compliance and emission reduction benefits. The program compliance fee is directed by state law to cover the costs of implementation, and is set at \$30 annually. A “referee” will be available to assist in challenges that arise for truck operators, similar to the service available to assist the public under the light-duty Smog Check program. Operators of freight facilities and freight contractors will be required to participate in the program to ensure the trucks they hire or visit their facilities are compliant with the HDIM.

Securing Enormous Health Benefits

The HDIM program represents the most health-protective measure implemented in California in over a decade. Further, the health benefits are projected to be 18 times the cost of compliance over the life of the program. CARB estimates that the program will result in the following benefits to Californians:

- \$72.1 billion in public health benefits between 2023-2050
- Avoid 7,176 premature deaths
- Avoid over 3,300 Emergency Room visits

¹ California Air Resources Board. Heavy Duty Inspection and Maintenance Program Fact Sheet. November 2021. <https://ww2.arb.ca.gov/our-work/programs/inspection-and-maintenance-program/heavy-duty-inspection-and-maintenance>

² American Lung Association. State of the Air 2021. April 2021. www.lung.org/sota

³ CARB. 2020 Mobile Source Strategy at pp. 19-20. September 2021. https://ww2.arb.ca.gov/sites/default/files/2021-09/Proposed_2020_Mobile_Source_Strategy.pdf

⁴ *Ibid* at p. 20.

- Avoid over 2,400 hospitalizations for cardiovascular or respiratory illness
- Cut smog-forming NOx emissions by 30.3 tons per day (tpd) in 2024 and 71.6 tpd in 2031
 - In Southern California, NOx reductions will be 8.4 tpd in 2024 and 19.5 tpd in 2031
 - In the San Joaquin Valley, NOx reductions will be 8.6 tpd in 2024 and 18.7 tpd in 2031

Capturing Greater Health Benefits

CARB has evaluated additional scenarios during this rulemaking, including “Alternative 2” which would increase the frequency of testing for trucks equipped with On-Board Diagnostics from two to four times per year, and for non-OBD trucks to go through testing more in line with light-duty Smog Check diagnostic testing. Increasing frequency for OBD-equipped trucks to quarterly data transfers from OBD system to CARB to ensure compliance with emission controls alone would save hundreds of lives on top of the benefits outlined above by addressing compliance issues sooner. This Alternative is projected to boost avoided deaths to over 8,100 and total monetized benefits to over \$80 billion over the life of the program. These additional benefits surpass the total benefits of many major CARB rules and should be considered in designing the final program.

In closing, California's health and medical community have eagerly anticipated the adoption and implementation of the Heavy-Duty Inspection and Maintenance program for years. CARB should adopt a final rule that is at least as beneficial to the health of Californians as the staff proposal, and should consider more frequent testing to expand the health benefits of this landmark policy. Please contact Will Barrett with the American Lung Association at William.Barrett@Lung.org for any additional information.

Sincerely,

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