

From: Cody Rosenfield
To: [ARB Clerk of the Board](#)
Subject: CCA comments for hdvip18
Date: Thursday, December 20, 2018 11:03:31 AM

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The online submittal for hdvip18 is not working, so I am providing comments here. Thank you!

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Coalition for Clean Air

Subject: CCA Support for HDVIP & PSIP Amendments

The Coalition for Clean Air appreciates the opportunity to comment on the proposed changes to the Heavy Duty Vehicle Inspection Program and Periodic Smoke Inspection Program and supports the proposed regulatory language.

The California Air Resources Board (CARB) has prioritized reducing emissions from heavy-duty vehicles in the requirements set by the Sustainable Freight Action Plan. Still, there is an ongoing compliance crisis within the fleet of trucks that service California's agriculture and freight industries. The proposed amendments will not only help CARB address non-compliance but also streamline the process for those subject to the regulation. There are considerable time-saving and resource-saving measures included in these amendments.

Crucially, the modifications require owners who have received citations to submit a "demonstration of correction" to CARB, proving that dirty vehicles were fixed. It also requires that sellers maintain records of sales for two years in order to ensure proper testing was conducted.

Equipment owners will benefit from language allowing increased time for repairs and avoiding duplicate testing requirements by exempting sales to dealers and brokers.

CARB is working to tweak regulations toward greater compliance and reduced hardship on impacted industries. These are common-sense amendments that will improve the programs and reduce emissions from the dirtiest vehicles.

CCA urges the passage of the proposed changes to the regulatory language as they are long overdue. Yet, non-compliance will be a problem that continues to plague Californians – especially those living in communities heavily impacted by diesel pollution – until the state adopts an emissions-testing program for heavy-duty trucks similar to the smog-check program for passenger vehicles.