



September 25, 2025

Doris Lo
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: Air Plan Revisions; California; Heavy-Duty Vehicle Inspection and Maintenance Program (Docket ID: EPA-R09-OAR-2025-0061)

Dear Ms. Lo:

On behalf of the undersigned health and medical organizations, we write in opposition to the United States Environmental Protection Agency's (EPA) proposed partial disapproval of California's State Implementation Plan for Ozone (Ozone SIP). The action proposed by EPA - to redact the out-of-state NO_x reduction benefits of the Heavy-Duty Inspection and Maintenance (HDIM) program SIPs - is a novel approach for the agency and contrary to the best interests of California and states' long-standing responsibility and authority to protect public health.

We call on U.S. EPA to fully approve California's 2022 Ozone SIP without delay. At its core, HDIM is a life-saving clean air policy estimated to save thousands of lives, prevent thousands of costly medical interventions and generate over \$70 billion in criteria air pollutant reduction-related public health benefits over the course of implementation. NO_x is a precursor to ozone formation and HDIM is an effective pollution control strategy identified through robust public process to curb ozone-forming emissions from trucks operating in California, which represent the leading source of on-road NO_x. The HDIM program applies to all vehicles operating in the state of California, ensuring a level playing field for compliance to ensure that the residents of the state are protected against excess emissions caused by failures of emissions controls, maintenance lapses or exhaust system tampering.

California is home to the most difficult air pollution challenges in the United States. The American Lung Association's "State of the Air" 2025 report illustrates that nearly nine in ten (88%) of Californians live in communities impacted by ozone and/or fine particle pollution. Exposure to unhealthy air pollution contributes to asthma attacks, heart attacks, stroke, lung and other cancers, premature birth, developmental harm and death. Beyond California, 156 million Americans (46 percent) live in a community impacted by unhealthy levels of ozone and/or particle pollution.¹ All Americans rely on EPA to uphold its mission "to protect human health and the environment. EPA works to ensure that: Americans have clean air."²

¹ American Lung Association. State of the Air 2025. April 2025. [Key Findings | State of the Air | American Lung Association](#)

² United States Environmental Protection Agency. Mission. July 2025. [Our Mission and What We Do | US EPA](#)

The Clean Air Act codified the authority to address exceptional challenges facing California. California's decades-long policy leadership has drastically reduced harmful emissions as a result of strong local-state-federal partnerships rooted in health protection. Presently, ongoing deregulatory efforts at the federal level aimed at eliminating, delaying or otherwise gutting the effectiveness of pollution controls are a direct threat to the health of all Americans. If EPA's proposal is successful in causing further uncertainty by partially disapproving the Ozone SIP, additional regulatory strategies will ultimately need to be adopted to achieve the National Ambient Air Quality Standards for Ozone.

Trucks are significant drivers of both economic activity and worst-in-the-nation air pollution. California's economic engine ranks as the fourth largest in the world behind the United States as a whole, China and Germany. Further, heavy-duty trucks represent approximately "three percent of total on-road vehicles (including vehicles operating in California from out of state). In 2020, heavy-duty vehicles emitted approximately 52 percent of the statewide on-road mobile source oxides of nitrogen (NO_x) emissions and about 54 percent of the statewide on-road mobile source particulate matter..."³ Approximately half of the trucks operating in California are out-of-state or out-of-country, necessitating the applicability of the HDIM program to adequately address harmful emissions. As further explained in regulatory documents: "...out-of-state vehicles are responsible for about 27 percent of total NO_x emissions, and 36 percent of total PM 2.5 emissions of all heavy-duty vehicles operating in California each day. To ensure the most effective program necessary to meet upcoming federal attainment standards and State Implementation Plan (SIP) commitments, it is critical to ensure that these vehicle populations ... properly maintain their emissions control systems."⁴

The benefits of the program to human health and air quality are staggering. The HDIM program is projected to reduce NO_x emissions by more than 70 tons per day by 2031 and 81 tons per day by 2037. HDIM represents the single largest NO_x reduction program implemented in California since 2008, and the largest program in the statewide Ozone SIP, including significant emission reduction contributions toward local ozone planning efforts in the South Coast and San Joaquin Valley air basins. The emission reductions will save over 7,000 lives, reduce thousands of hospitalizations and emergency department visits for pollution-related illnesses. This amounts to over \$70 billion in public health benefits generated over the course of the program. This is 18 times the estimated costs of compliance with the program and does not include the full suite of health benefits associated with reductions of hazardous air pollutants and other factors beyond the scope of California Air Resources Board's (CARB's) health benefits analysis.

The HDIM program was vetted through years-long legislative and regulatory processes. With bipartisan support, Senate Bill 210 was signed into law in 2019, followed by several more years of regulatory proceedings at CARB. The successful legislation was debated in seven standing committees and subject to eleven rounds of votes in the California Legislature, with significant stakeholder input leading to multiple rounds of amendments throughout the process.⁵ Within the robust regulatory setting, CARB held multiple hearings, more than a dozen workshops and numerous stakeholder meetings to discuss all elements of the program with robust stakeholder participation.⁶

³ CARB, Initial Statement of Reasons at p.ES1, Oct. 2021.

<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/hdim2021/isor.pdf>

⁴ *Ibid.* at pp. ES-3-4.

⁵ California Legislature. California Legislative Information. Senate Bill 210 (Leyva). 2019. [Bill Votes - SB-210 Heavy-Duty Vehicle Inspection and Maintenance Program](#).

⁶ CARB, Clean Truck Check meetings and workshops calendar. [Clean Truck Check: Meetings & Workshops | California Air Resources Board](#)

EPA's announcement of its proposed partial disapproval misstates the HDIM program's goal and emissions targets. In announcing its proposed partial disapproval of the Ozone SIP over out-of-state trucking elements of the HDIM program, EPA misrepresents the intention of the program. EPA's press statement labels the program as "yet another attack on truck drivers and engine manufacturers who provide the food and products we need to survive. California's approach appears to be part of a larger strategy to drive out affordable trucks and products based on an extreme climate ideology."⁷ This assertion is inaccurate and contradicted directly by the language of the program itself. The state's documentation in proposing HDIM plainly states: "As the Proposed Regulation is a criteria pollutant reduction measure and not a greenhouse gas reduction measure, it is not included in planning documents specific to greenhouse reduction planning efforts such as California's Climate Change Scoping Plan." California has appropriately taken credit for the NO_x reduction benefits of the HDIM in the Ozone SIP, and not in the state's climate planning documents, specifically because HDIM is not a climate program. EPA's characterization of HDIM is factually incorrect and undermines crucial efforts to curtail criteria air pollutants, as well as EPA's mission to ensure that "Americans have clean air."

Crediting the reductions in the Ozone SIP is appropriate and necessary to the demonstration of ongoing progress toward attainment of clean air standards.

In the best interests of public health and ongoing air quality improvements, California must continue to implement the HDIM program as designed, and US EPA must fully approve the Ozone SIP without delay.

Sincerely,

American College of Physicians California Services Chapter
American Lung Association
California Nurses for Environmental Health and Justice
Center for Environmental Health
National Association of Pediatric Nurse Practitioners, Bay Area Chapter
Physicians for Social Responsibility/Sacramento
Regional Asthma Management & Prevention

⁷ [EPA press release, August 2025.](#)