September 18, 2023

The Honorable Steven S. Cliff, Ph.D.

Executive Officer

California Air Resources Board

1001 I Street Sacramento, CA 95814

ATTENTION: Clerk’s Office

**Re:** **Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus**

Dear Dr. Cliff:

The Association of Equipment Manufacturers (AEM)[[1]](#footnote-1) appreciates the opportunity to comment on California’s Air Resources Board (CARB) recent regulatory activity regarding the *Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus*, hereafter referred to as Omnibus. Representing the equipment manufacturers and suppliers in the construction, agriculture, mining, forestry, and utility industries in North America, we look forward to working more closely with CARB to share the expertise and technical knowledge of our industry. We believe it is critically important when developing regulations, that the interests of all stakeholders be considered and understood.

AEM members manufacture an array of vocational equipment that use on-road chassis trucks and powertrains as the platform to mount their equipment on (e.g., utility work vehicles, sewer jetting/vacuum trucks, mobile cranes, street sweepers, etc.) and will be greatly impacted by these rulemakings. Specifically, many of our members have immediate concerns regarding the influence they have on the availability of chassis/powertrains for this type of equipment, both legacy and ZEV, and the lead time to meet the requirements.

Our understanding is that the truck chassis manufacturers negotiated for adjustments in the MY2024-2026 Legacy rule that would allow for a small increase to available chassis volumes going into California. These Omnibus concessions included the use of emission credits and CARB 2024 engine spec revisions required to allow for these limited volumes. However, these limitations have resulted in substantial reductions and shortages against both historical and forecasted demand for CARB certified chassis to be sold into California. These shortfalls will result in substantial shortages of required vocational truck equipment to be sold to state, local, and private customers that provide essential products needed to maintain and support California’s and Oregon’s infrastructure and environmental clean-up requirements.

To meet the ZEV requirements of 9% starting in 2024, significant lead time is needed to complete the research and development process to produce electrified equipment.  In addition to the need for extensive safety testing prior to production, factories that produce equipment like street sweepers and vacuum trucks also need to reconfigure their production lines to change over to ZEV manufacturing.  This will also involve retraining of manufacturing employees who assemble these trucks to address proper safety procedures for assembling the electrified equipment to these ZEV chassis.  Additionally, infrastructure will need to be developed for safely replacing and recycling these large battery packs.  A rough estimate of 3-4 years to phase in the ZEV production is needed.

Given the complexity of this regulation and the overall impact it will have on the end users of heavy-duty engines and vocational truck equipment manufacturers, AEM members plan to participate in the Executive Officer hearing on October 20, 2023. We thank you for your consideration and look forward to continuing to be a key stakeholder in these rulemaking discussions.

Please feel free to contact Travis Webb, AEM’s Technical Manager, Safety & Product Leadership at twebb@aem.org if you have any questions or require any further information.

Best Regards,

Travis Webb

Technical Manager, Safety & Product Leadership

Association of Equipment Manufacturers (AEM)

1. AEM is the North American-based international trade group representing equipment manufacturers and suppliers with more than 1,000 member companies and over 200 product lines in the construction, agriculture, mining, forestry and utility industries. The equipment manufacturing industry in the United States supports 2.8 million jobs and contributes roughly $288 billion to the economy every year. Our industries remain a critical part of the U.S. economy and represent 12 percent of all manufacturing jobs in the United States. [↑](#footnote-ref-1)