



SM-3207

July 6, 2021

DELIVERED VIA ELECTRONIC MAIL

Chair Liane M. Randolph and Board Members  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Subject: Heavy-duty Omnibus 15-day Changes – GM Comments**

Dear Chair Randolph and Board Members:

General Motors (GM) appreciates the opportunity to provide comments on the most recent Omnibus 15-day changes.

GM supports the approach proposed by the California Air Resources Board (ARB) in subsection 11.B.5.3.5.2(c) to allow NOx and PM deficits created by legacy engine families to be offset by credits from the zero-emission averaging set for diesel engines < 525 horsepower. This is a thoughtful approach by staff which further encourages the broad electrification of these engines/vehicles and assures that the emission benefits of the 0.05 gm NOx/bhp-hour standards are fully realized in the real world. Further, it would be consistent to apply this same approach to all diesel engines regardless of horsepower rating.

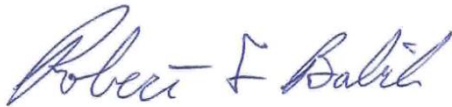
Specifically, ARB staff should include all those diesel engine applications > 525 horsepower where in lieu of the 0.05 gm NOx/brake horsepower-hour standard the existing 0.20 gm NOx/brake horsepower-hour standard is allowed to be carried over from 2024-2026 model years without requiring similar mitigation measures (as distributed at the August 27, 2020 Board hearing). There are plenty of traditional and non-traditional manufacturers attempting to electrify targeted applications to assist with California's Advanced Clean Trucks rule. Under the omnibus criteria rules, electrification of diesel engine applications > 525 horsepower deserves similar consideration and treatment as is being proposed in the most recent 15-day changes for diesel engine applications < 525 horsepower.

GM applauds efforts by ARB staff to recognize emission reduction projects in California's disadvantaged communities. In subsection 11.B.5.3.5.2(c)(3)(ii), a manufacturer may submit a plan to the CARB Executive Officer which would offset the deficits within five years and additionally, primarily ensure such reductions would benefit disadvantaged communities. Once again, this is a thoughtful consideration by staff that we wish to see further emphasized in the final rule. Unfortunately, as currently proposed, mitigation projects in California's disadvantaged communities only come into play once all other targeted compliance avenues have been thoroughly exhausted.

GM offers two suggestions to further improve this approach. First, as the intent is to recognize and encourage electrification, we believe that the projects targeted in California's disadvantaged communities should exclusively recognize and benefit the broad electrification of transportation. For example, electrification projects in nearby port authorities, industrial zones, warehouse districts, airports, and rail yards can benefit surrounding communities. Second, electrification projects in California's disadvantaged communities should have at least equal and perhaps greater consideration as the on-road mitigation measures detailed within the most recent 15-day changes.

GM appreciates the opportunity to provide additional context and perspective on our suggestions. We look forward to continued dialogue and collaboration with ARB and your staff to meet our shared goals.

Sincerely,

A handwritten signature in blue ink that reads "Robert F. Babik". The signature is fluid and cursive, with a small arrow pointing to the right above the letter 'i' in "Babik".

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