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August 31, 2023

The Honorable Steven S. Cliff, Ph.D.  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
ATTENTION: Clerk's Office

Dear Dr. Cliff:

Per the California Air Resources Board (“**CARB**”) notice posted August 1, 2023, and pursuant to California Government Code § 11346.8, Municipal Maintenance Equipment (“**MME**”) respectfully requests that CARB hold a public hearing on its proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus (“**Omnibus**”) regulation prior to finalizing any amendments to the regulation.

MME is a California business that provides fleet vehicles, such as sewer cleaning, trash collection, street cleaning and repair, and fire suppression vehicles, to municipalities, counties, special service districts, and other governmental customers throughout California. Recently, we have seen a drastic decrease in the number of both legacy engines and Omnibus-compliant engines available from our manufacturers. As a result, we are concerned that we, and other distributors like us, may be unable to fulfill our state and local government customers' vehicle replacement orders while zero emission vehicle engines are under development. If the Omnibus regulation is not amended to address this engine shortfall, there may be a significant and statewide adverse economic impact on businesses like ours, and on the ability of our public agency customers to provide services that are critical to statewide public health and safety and the protection of the environment.

We believe a public hearing is warranted to ensure that CARB fully understands the significance of this engine shortage and its impact on our governmental customers. I may be reached at 916 768 1717 or [jwheeler@source-mme.com](mailto:jwheeler@source-mme.com) for any questions concerning this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'JW', enclosed within a blue scribble that forms a large, irregular loop.

James Wheeler  
General Manager  
Municipal Maintenance Equipment

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