



MOBILE CRANE OPERATORS GROUP

447 Georgia Street
Vallejo, CA 94590
Ph: (707) 552-6040
Fax: (707) 552-6090

September 15, 2023

The Honorable Steven S. Cliff, Ph. D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Mobile Crane Operators Group Comments on Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Thank you for this opportunity to comment on the amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (the amendments). This letter has been presented to you by the Mobile Crane Operators Group (MCOG). The MCOG represents over 90% of the union crane rental contractors operating fleets of mobile cranes in Southern California. The members of the MCOG provide vital services to support the construction industry—including transportation and renewable energy infrastructure—in California as well as providing cranes in emergency situations following natural disasters.

The MCOG are concerned that the amendments, while offering engine manufacturers some additional flexibility, do not offer enough flexibility to engine manufacturers that provide engines to heavy on-road crane manufacturers. There has been a long-standing difference between the United States Environmental Protection Agency (USEPA), which allows non-road or on-road diesel engines to be installed in heavy on-road cranes for sale into the US market, and the California Air Resources Board (CARB), which requires only on-road engines to be installed in heavy on-road cranes for sale into the California market, unless granted an exemption.

USEPA and CARB engine emissions standards for on-road diesel engines have been harmonized for more than a decade. During this time, manufacturers of heavy on-road cranes have incorporated these engines into the design of their vehicles, making the whole US a unified heavy on-road crane market. The MCOG anticipate that the amendments will end this alignment and force engine manufacturers to choose actions that will leave heavy on-road crane manufacturers without enough on-road engines that can be introduced to the California market. Without sufficient engine availability, over 50% of the on-road cranes currently produced could be eliminated from the California market.


Crane owners are required by the Heavy Crane Provision of the Solid Waste Collection Vehicle Regulation to phase in heavy on-road cranes that have 2010 or newer engines. The regulation requires the phase out of heavy on-road cranes with engines older than 2010, from January 1, 2024, through January 1, 2027. Up to 40% of the heavy on-road cranes in fleets are affected. When heavy on-road crane manufacturers are unable to supply the California market with sufficient new cranes due to the amendments, California crane rental companies will be forced to turn to the used crane market to meet their compliance requirements—assuming there are compliant used cranes available. It is vitally important that cranes with the latest engine technology be available in order to enable the MCOG members to continue to upgrade their fleets in an economically efficient manner. The Mobile Crane Operators Group requests that CARB consider additional amendments, which will keep new heavy on-road cranes available to the California market.

The Heavy-Duty Engine and Vehicle Omnibus Regulation, as currently amended and proposed, will severely restrict the availability of new engines for heavy on-road cranes in 2024 and 2025, since engine manufacturers supplying heavy on-road crane manufacturers may choose to manufacture engines that comply only to USEPA standards in the size and power categories used in heavy on-road cranes for other preferred customers by sales. This would mean that certain cranes would not be available to the California market, which would adversely affect the ability of crane rental companies to comply with the Heavy Crane Provision of the Solid Waste Collection Vehicle Regulation for crane owners.

CARB has a track record of recognizing the heavy on-road crane industry for its unique engine needs. In 2006, CARB opened a process for All-Terrain Cranes to gain exemption from the requirement that on-road vehicles be manufactured with on-road engines. In 2019, CARB amended the Solid Waste Collection Vehicle Regulations to preserve the Heavy Crane Provision when amendments to the Truck and Bus Regulation were voided by a court ruling. Most recently, heavy on-road cranes were exempted from the Advanced Clean Fleets Regulation, which mandates subject vehicles to become electrified by 2042. The Mobile Crane Operators Group once again calls on CARB to recognize the heavy on-road crane industry by providing an amendment to the Heavy-Duty Engine and Vehicle Omnibus Regulation. Such an amendment would allow, uninhibited by legacy sales provisions, the sale of a small quantity (less than 50) USEPA certified on-road engines to heavy on-road crane manufacturers for the purpose of introduction to the California market.

Thank you for taking the time to consider the Mobile Crane Operators Group requests for CARB to consider the impact of the amendments on the new heavy on-road crane market and on crane owners in California, and to open an accommodation for heavy on-road crane manufacturers to sell cranes with engines complying with only USEPA emissions standards into the California market for the 2024 and 2025 engine model years.

Mobile Crane Operators Group

By:  _____
Ian Johnson, President