

LINK-BELT CRANES
2651 Palumbo Drive
Lexington, KY 40509
(859) 263-5200
www.linkbelt.com



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

Subject: Link-Belt Cranes Comments on Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Dear Dr. Cliff:

On behalf of Link-Belt Cranes (LBC), and pursuant to Section 11346.8 of the California Government Code, I write to request the California Air Resources Board (CARB or Board) hold a public hearing on its proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus regulation.

LBC is a manufacturer of heavy-duty mobile cranes in Lexington, Kentucky. Our core products include hydraulic truck cranes and all-terrain cranes, both of which are equipped with federally compliant on-road heavy-duty diesel engines. As a matter of policy, LBC strives to be in the vanguard for the implementation of the latest diesel emissions reduction technology.

The United States Environmental Protection Agency and CARB engine emissions standards for on-road diesel engines have been harmonized for more than a decade. During this time, LBC has incorporated these engines into the design of our products, making the whole United States a unified heavy-duty on-road crane market. The Omnibus regulations have ended this period of harmonization and with the recently proposed changes to the regulations we anticipate our ability to serve the California market will be eliminated.

Heavy-duty on-road mobile cranes and their owners provide vital services critical to California's citizens. Services include, but are not limited to, heavy civil improvement projects, conventional and renewable energy infrastructure, and emergency response. Without the opportunity to modernize and refresh crane fleets, the proposed regulation changes will limit California based end user's ability serve the people of California. Additionally, circumstances of this regulation will inhibit crane fleet owners' ability to comply with 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.

A public hearing is warranted to ensure the Board and heavy-duty crane operators, along with the public, fully understand the impact of the proposed amendments and the impact on the state's critical infrastructure goals.

Thank you for your time and the opportunity to comment on the proposed amendments to the Omnibus regulations. I may be reached at asoper@linkbelt.com or by phone at (859) 264-6405.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "ASoper", is written over a light blue horizontal line.

Andrew Soper – Product Manager
Link-Belt Cranes

