



**The Manitowoc Company, Inc.**  
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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

Subject: The Manitowoc Company, Inc.'s Comments on Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

On behalf of The Manitowoc Company, Inc. ("Manitowoc") and pursuant to Section 11346.8 of the California Government Code, I write to provide comments to the California Air Resources Board (CARB) on its proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus regulation.

Manitowoc is the parent company of Grove U.S. LLC, which manufactures heavy-duty mobile cranes in Shady Grove, Pennsylvania. Among our core products are hydraulic truck cranes, which are equipped with on-road heavy-duty diesel engines. As a matter of policy, Manitowoc strives to be at the forefront in the implementation of the latest diesel emissions reduction technology. Unfortunately, the Omnibus regulation, as proposed, has limited the number of CARB-compliant engines available for our hydraulic truck cranes. If the proposed regulation is finalized, we anticipate that we will no longer be able to serve the California market.

The United States Environmental Protection Agency (USEPA) and CARB engine emissions standards for on-road diesel engines have been harmonized for more than a decade. During this time, Manitowoc has incorporated these engines into the design of our products, making the United States a unified heavy-duty on-road crane market. The Omnibus regulations have ended this period of harmonization and, as noted above, with the recently proposed changes to the regulations we anticipate our ability to serve the California market will be eliminated. For this reason, we request that CARB provide heavy on-road crane manufacturers a mechanism under the Omnibus regulations to sell cranes equipped with engines meeting USEPA emission standards into the California market for the 2024 and 2025 engine model years.

Heavy-duty on-road mobile cranes and their owners provide vital services critical to California's citizens. Services include, but are not limited to, civil improvement projects, conventional and renewable energy infrastructure, and emergency




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response. Without the opportunity to modernize and refresh crane fleets, the proposed regulation changes will limit California end users' ability to serve the people of California. Additionally, the provisions of the proposed regulation will inhibit the 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.

Thank you for taking the time to consider Manitowoc's request for CARB to consider the impact of the proposed regulation on the new heavy on-road crane market and on crane owners in California, and to provide a mechanism 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.

**The Manitowoc Company, Inc.**

By: \_\_\_\_\_

Les Middleton, Executive Vice President Americas & EU Mobiles