



June 16, 2021

The Honorable Liane M. Randolph, Chair and
Honorable Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Proposed Amendments to the Heavy-Duty Engine Vehicle Omnibus Regulation and Associated Amendments: Subsection 1956.8 (a) (2) (F)

Dear Chair and Members of the Board,

The [California Bus Association](#) (CBA), representing private, mostly family owned, charter bus companies in California, is requesting an extension of the Truck and Bus Fleet Rule and an extension of the proposed Omnibus Low NOx Rule effective January 1, 2024.

First, the CBA respectfully requests an extension of one year for the 2022 deadline for replacing 2006 EMY motor coaches and a one-year extension for the 2023 deadline until 2024.

Second, we respectfully request an extension of the 2024 Omnibus Low NOx Rule to 2027 as you have granted to the transit industry.

Due to COVID, 95% of charter bus companies had shut down in California, and with California only opening 6/15/21, a full recovery will likely be a one-to-two-year process. Operating mileage and emissions output for the past 15 months have been near zero when compared to 2019.

Most of the motor coach companies have participated in either fleet replacements or upgrading engine technologies to attain compliance with the Truck & Bus regulations. With the Governor implementing the Stay-at-Home order in March 2020, motorcoach companies have had their CARB-compliant fleets sitting idle, with no demand for services and no revenue. While under normal conditions, meeting the 2022 deadline for operating 2006 and older EMY engines would be challenging to most, with the complete cessation of business in California, it makes this impossible for many.

Frankly, COVID-19 has decimated the financial floor of our industry. Nationwide, we have seen hundreds leave the industry all together from the resulting bankruptcy and repossessions by lenders. As an industry, we will see far less vehicle miles travelled for another 12 to 24 months as we ramp back up to some "new normal". We are also seeing the ripple effects of this pandemic in the areas of vehicle financing and driver availability. Case in point, equipment financing is critical for motorcoach companies to update their fleets to maintain CARB compliance, however the past 15 months have caused several traditional financing sources to exit the bus market; among these are SunTrust and Key Bank. Purchasing new equipment to replace soon to become non-compliant buses (2006 and older) during these still uncertain times has become next to impossible.



The Trucking industry, on the other hand, has seen a continuing and dramatic rise in demand and growth brought on by the online purchasing marketplace.

COVID affected the charter bus industry far more negatively than the trucking industry in California. In fact, the financial crisis in the bus industry represents 0.002% of the total truck / motor coach population. CBA is requesting that the 2022 deadline for replacing 2006 EMY motorcoaches be delayed until 2023 and likewise delay the 2023 deadline until 2024.

Secondly, the CBA is requesting a delay in the CARB implementation of the Omnibus Low-NOx rule for the motorcoach industry until 2027. Based on CARB's planned implementation of new engine emission standards in 2024, at least one of the major diesel engine manufacturers have confirmed they will not have CARB-compliant engines available for the motorcoach market by 2024. The largest of the engine suppliers, Cummins, will only have a diesel engine upgraded in time for the 2027 federal emissions standards. Daimler, owner of Detroit Diesel Corporation, a large producer in the market, may no longer supply engines (the DD13) for other OEM motor coach manufacturers after December 2021.

With the situation likened to the one faced by the transit industry and considering the motor coach market in California is relatively small, the CBA is requesting that the 2024 diesel engine exemption outlined under 1956.8 (a) (2) (F) of the amendments for transit be extended to include motor coaches for both public and private operators.

Lastly, as mentioned above, based on the relatively small number of buses in California compared to trucks, the impact environmentally will be extremely low. And to further emphasize the low impact of our request, the attached report, prepared by MJB &A for the American Bus Association Foundation in June 2019 outlines that motor coaches are by far, the least emitting form of transportation reviewed. On pages 7 through 12, the conclusions indicate:

Motorcoaches, as studied, have the best fuel and CO₂ emissions compared with other forms of mass transit, including:

- 1) HIGHEST passenger miles per gallon- 280.1
- 2) LOWEST BTU per passenger mile- 492.7
- 3) LOWEST CO₂ grams per passenger mile= 36.7

With this in mind, we thank you for your consideration of these two requests.

Respectfully Submitted,

Victoria Cole
President
California Bus Association

<https://www.busandmotorcoachnews.com/detroit-diesel-exiting-motorcoach-market/>