August 29, 2023

The Honorable Steven S. Cliff, Ph.D.

Executive Officer

California Air Resources Board

1001 I Street

Sacramento, CA 95814

ATTENTION: Clerk’s Office

**RE: PUBLIC HEARING REQUEST: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation**

Dear Dr. Cliff:

On behalf of ABC Companies, 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 (Omnibus) regulation, per the Board’s notice posted on August 1, 2023. We would seek the hearing to be scheduled prior to the close of the comment period or, alternatively, seek to have the comment period extended beyond September 18 to accommodate a public hearing.

As a new motorcoach dealer and exclusive distributor of Van Hool motorcoaches, we have a vital interest in CARB’s proposed action to amend the Omnibus regulation, and believe it is important for the Board to hold a public hearing on this matter to fully assess both the proposed amendments and their impact, as well as the steps leading to the development of these amendments.

ABC Companies is unique as a leader in zero emissions motorcoach sales and service, having sold and now maintaining 90 fully electric motorcoaches in the bay area. While transitioning many of our California based customers to zero emissions battery electric motorcoaches, it is very clear that a strategy is needed to align the cadence of integrating zero and lower emissions motorcoaches with commercially available clean diesel engines. Specifically, our operators in California need an exemption allowing them to purchase currently compliant diesel engines until new lower emissions engines are commercially available in quantities that align with available chassis. In parallel, there is a critical need to deploy a publicly available charging infrastructure that is compatible with the needs of currently available electric motorcoaches. Without the ability to balance the availability of current diesel technology, lower emissions diesel technology and a supporting infrastructure for a growing fleet of electric motorcoaches, this critical industry is in jeopardy.

The Board’s action appears to be predicated solely on heavy-duty truck engine manufacturer product plans,[[1]](#footnote-1) and we believe it important for the Board to provide for the exchange of additional information from the end users of these engines, in a public forum.

Further, a public hearing is warranted to ensure the Board and heavy-duty vehicle operators, such as the bus and motorcoach industry, along with the public, fully understand the impact of the proposed amendments on the end users of heavy-duty engines, and in turn the impact on the state’s transportation network and emissions goals.  
  
For these reasons, ABC Companies requests the Board to schedule a public hearing before moving forward with the proposed amendments to the Omnibus regulation. I may be reached at 912 660 7043 or tpeebles@abc-companies.com, for any questions concerning this request.

Respectfully submitted,

**R. Thom Peebles  
Vice President, Marketing**

**ABC Companies**

1. [Public Hearing to Consider the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation, Staff Report: Initial Statement of Reasons](https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2023/hdomnibus2023/isor.pdf), August 1, 2023, p. ES-154 [↑](#footnote-ref-1)