



"We make getting there half the fun!"

September 15, 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: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Dear Dr. Cliff:

On behalf of Classic Charter, I would like to submit the following comments in response to the Notice of Public Comment Period on Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (Omnibus regulation), posted on August 1, 2023 (Notice). Although we do appreciate the Air Resources Board's (CARB) proposal to align with the U.S. Environmental Protection Agency's (EPA's) 2022 Heavy-Duty Engine and Vehicle Standards final rule, including the new inducement schedules, the Omnibus regulation even with the proposed new legacy engine provisions, is going to interfere with my ability to purchase new motorcoaches over the next three years. Rather than put my business at risk from this hardship, **I respectfully request that CARB provide a short-term exemption from the rule for motorcoach engines, during model year 2024 through model year 2026.**

My company provides charter bus transportation to schools, military, emergency services, shuttles, weddings, camps and church groups throughout the Central Valley.

Please know that my company does support CARB's goal of reducing emissions and addressing climate change. Motorcoach operations have a long history of providing environmental benefits, particularly here in California. Motorcoaches are the most energy efficient and lowest emissions form of passenger transportation (on a per person basis), taking cars off the road and reducing congestion. Through the years our engines have become cleaner, and we are burning cleaner fuels. We also support advancement of emissions reducing technologies. But the advancement of these technologies cannot be at the expense of continuing our business.





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Under the Omnibus regulation, even with the amendments to the legacy engine provisions, motorcoach manufacturers are not going to receive an adequate supply of engines to produce new motorcoaches for model years 2024 through 2026. Apparently, the rule restricts the number of legacy engines manufacturers can produce, and because these engines can go into trucks or motorcoaches, the motorcoach manufacturers are being told their allocation of engines will be few to none, during this time period. Based on this forecast, we are told no new motorcoach equipment will likely be available until model year 2027.

With 45 vehicles pre covid and 25 total vehicles now, as we hire more drivers, we will need to purchase new or newer vehicles. If new vehicles are not available, we will lose out on new business requiring such vehicles. This will put pressure on the used market as those prices will rise with supply and demand. If new coaches are not available that keeps vehicles in service longer than they should not helping the air. We want the ability to upgrade to the latest and greatest in safety features that come with newer vehicles.

It will cause severe hardship to my company and operations if there are no new motorcoaches available for purchase over the next three years. Considering motorcoach operations already provide significant environmental benefits, and that this issue is only short-term, **please amend the Omnibus regulation to include an exemption for engines used in motorcoaches for model years 2024-2026.**

Respectfully,

**Chris Riddington
President
Classic Charter, Inc.**

