



California Bus Association

Promoting Professionalism, Safety & Integrity in the Motorcoach Industry

To: Clerk of the Board, California Air Resources Board
1001 I Street, Sacramento, California 95814

From: California Bus Association

RE: Comment Letter Regarding Issues with Proposed Advanced Clean Fleets (ACF) Regulation

On behalf of the California Bus Association (CBA), a statewide organization promoting professionalism, safety and integrity in the motor coach industry, I am writing to make suggestions for modification of the proposed regulatory action, and also to share our concerns with moving to a zero emission fleet as envisioned, in the hopes of protecting the ability of the industry to operate while the state moves towards a zero emission future. CBA as a representative of the industry is committed to being a partner in innovation and adoption of technology to help lower emission, but we see issues with the current proposal and suggest the following:

Need for Modification of the Definition of High Priority Fleets

The definition of “High Priority Fleets” should be raised to include only those fleets with gross revenues over \$100M or more than 100 buses. As an association we represent members that have fleets with more than 50 buses and annual revenues greater than \$50 million. This gives us direct insight as to the impact of these proposed regulations and how they will harm our industry, despite this Board’s noble aspirations to lower tailpipe emissions. In considering the specific needs of our industry, we offer the following recommendations in addition to our position that the definition of high priority fleets should be modified as stated:

Need for Industry Specific Exemption from the ACF Regulations For the Over the Road Motor Coach Industry

Weight Issues Particular to Luggage Space

A current motor coach is already essentially at maximum gross vehicle road weight capacity. The physical demands of switching the vehicles to battery electric power, or other ZEV technology would severely diminish the ability of the buses to maintain the luggage capacity necessary to service its typical riders in proportion to the number of available bus seats. Based on that physical reality alone we would like the Board to envision a scenario in which the motorcoach industry lost $\frac{2}{3}$ of the luggage capacity which in turn loses customers, putting the industry at a severe disadvantage.

Infrastructure and Range Issue

We understand some may take the approach that advanced clean fueling infrastructure will be in place to support fleet transition, however our position is that based on current technology and the forecasted technology by the manufacturers, there will not be any increase in operating range for a motor coach in the near future. This causes a problem particular to our industry which bases its business model on long hauling passengers over routes that may not be consistent with other long haul trucking operations.

Status and Cost of Existing Technology

We estimate the cost for an electric bus to be \$750,000, on the low end, up to \$1.2M. Our industry is already struggling to comply with the Truck and Bus regulation phasing out useful vehicles crucial to our business model. We estimate the cost of a new clean diesel at \$650,000. It's our position that the cost of a motorcoach is NOT the same as a truck and should be treated differently.

We recognize that programs such as HVIP and Carl Moyer, are available to help incentivize fleet transition, however to ask our operators to shell out 50% more than they currently do for their buses without taking into consideration the facts addressed above, particular to the industry, is a recipe for the demise of the over the road motor coach. Given the comments laid out above regarding the need for solutions tailored specifically to the bus fleets we operate, we ask that this Board consider taking further action to address our industries particular needs.

Additional Context

As anecdotal evidence of these industry specific challenges, we would like to highlight issues that are impacting public fleets as well. As we understand it, Cal Trans operates several long distance routes contracted through Amtrak to connect to the Amtrak regional trains. These routes operate 435 miles or more in a given day and operate to the limit of current driver regulations, with inaccurate time to charge an electric motor coach between runs. Additionally due the connection with the Amtrak trains there is a requirement that the motor coach be equipped with a minimum of 400 cubic feet of luggage space.

None of these challenges can be met with current or foreseen electric motor coaches and current fuel cell technology cannot meet the demands of continued high speed operations required by a long distance motor coach. As such regulation of the motor coach industry requires a particularly nuanced approach.

Conclusion

The effect of these regulations as proposed will have a significant impact on the bus industry's ability to operate in California, given the inability to comply with these onerous proposals. The unintended harms of this proposal will potentially cause many small businesses (who have

operated here for generations) to shut down or move operations to other states. Such consequences will cause our State to lose important jobs, reduce transportation options for Californians and reduce the State's potential tax revenue given the exodus or destruction of this industry. As such, we oppose the ACF regulation as proposed and submit these comments to the Board in the hopes that they will be considered to reshape the regulation in a way that takes into account the realities of the technology and does not blindly push toward a zero emission future that simply isn't ready for primetime.

Sincerely,

VICTORIA COLE
PRESIDENT