



October 20, 2023

Clerks' Office, California Air Resources Board
1001 I Street
Sacramento, California 95814

Coach USA Testimony for CARB Hearing

I would like to thank the Board for the opportunity to speak today. My name is Dan Rodriguez, and I serve as the Vice President of Public Affairs for Coach USA and Megabus. We are one of the largest passenger transportation companies in North America, offering services throughout the United States and Canada. Within the state of California, we provide affordable bus services that meet the needs of thousands of residents who rely on this type of transportation.

At present, our operations in California involve a fleet of 108 buses. Coach USA routinely upgrades our vehicles, maintaining an average fleet age of 10 years. Our efforts have been recognized by the EPA as being instrumental in reducing our carbon footprint. Unfortunately, recent discussions with three of the largest motorcoach manufacturers revealed their anticipation of scarce vehicle availability in California for at least the next three years. This scarcity is not solely attributed to supply chain disruptions, the ongoing UAW strike impacts engine manufacturing and other crucial bus components.

A more critical driver of this issue is the impact of the Omnibus Low Nox regulation on engine manufacturers, which leaves them unable to provide engines for motorcoaches. While there are similar challenges within the truck sector, it seems the amendments made by CARB and engine manufacturers primarily considered truck fleets, while excluding bus fleets.

I urge CARB to account for the requirements of the state's bus operators. Coach USA comprehends the urgency of combatting climate change, and we have contributed to substantial strides in this area. Our buses remove millions of carbon-emitting cars from California's roads annually, emitting only 1.7 lbs PPX, which is significantly lower than the emissions of an average SUV that surpass 17 lbs. PPX. Due to the impact of COVID, we had to curtail expenses and postpone fleet acquisitions due to the substantial decrease in ridership that has yet to fully recover to pre-pandemic levels. Consequently, we might be left with no alternative but to reduce services, leading to potential layoffs. This would result in a decrease in



environmentally responsible transportation options, posing a significant challenge for our customers, especially those from rural and economically disadvantaged communities who heavily rely on our services.

It is imperative for us to have the ability to acquire new motorcoaches as the transportation services we provide require them. Not only does the state depend on us, but, more importantly, so do our customers, including first-responders, essential workers, and schoolchildren. While we recognize that this may be a short-term issue, for Coach USA, it is crucial for our continued operation in this environment. I earnestly implore CARB to collaborate with us to ensure the continuous operation, viability, and competitiveness of the motorcoach industry in California and nationally. These efforts can pave the way for a comprehensive strategy that not only addresses the immediate challenges but also fosters long-term growth and resilience.

Once again, I express my appreciation for this opportunity to address the Board on this matter.

Respectfully submitted,

Dan Rodriguez
Vice President of Public Affairs