



## California Bus Association

Promoting Professionalism, Safety & Integrity in the Motorcoach Industry

### Response to Rulemaking 2008-12-11 Notice 15 Day – Truck and Bus Regulation Changes

The California Bus Association (CBA), representing intercity, passenger stage corporations and charter bus companies is hereby responding to the California Air Resources Board Notice of modifications to the regulation.

CBA **supports** the following 15 Day Notice modifications and expansions of the rule:

It expands the definition of “heavy duty diesel vehicle” to include “motorcoach” in new Section 2025(d)(39).

It modifies the definition of “NOx Exempt Vehicles” to include motorcoaches since they are exempt from the NOx performance requirements until 2017 under Section 2025(d)(56)(E).

Section 2025(g)(2) is added so that fleets that have motorcoaches can comply with a separate NOx percent limit schedule as “MC NOx BACT”.

Consistent with the above changes, Section 2025(g) Table 2 (Percent of Total Fleet) option adds a separate compliance path for motorcoaches.

Section 2025(h)(2)(C) provides a definition of the NOx target for motorcoaches in determining the NOx target rate option (fleet averaging option) for motorcoaches in a fleet.

Consistent with Section 2025(h)(2)(C), Table 3 lists the fleet NOx targets for motorcoaches.

A new section 2025(l) has been added to “provide motorcoaches an exemption from the NOx requirements until January 1, 2017...”. The new motorcoach NOx values are used for the two options in Table 2 or Table 3.

New section 2025(p)(1)(D) adds motorcoaches to the NOx exempt list until January 1, 2017.

The amendments in this 15 day notice as cited above will materially benefit both the environment and all motorcoach patrons.

Our industry is recognized as a leader in contributing to the reduction of traffic congestion and airbourne criteria pollutants such as NOx, PM, and also CO2.

The continued sustainability of the entire motorcoach industry to serve fixed route and charter demand depends on a regulatory scheme that balances the ability of our industry to remain in business while reducing mobile source emissions.

The changes in the regulation referred to in this response are a positive step in this direction.

A handwritten signature in black ink, appearing to read 'C R', with a stylized flourish at the end.

Chris Riddington, President  
California Bus Association