

**Comment 1 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Natalie

Last Name: Blasco

Email Address: justnat@xtra.co.nz

Affiliation:

Subject: Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

I am in favor of doing as much as possible to reduce emissions from these vehicles. We should always be looking for ways to reduce emissions and not for excuses as to why we can't, especially since the technology is available.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-04 19:59:20

No Duplicates.

**Comment 2 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Gregory  
Last Name: Hendricks  
Email Address: greg.hendricks@saltlakeexpress.com  
Affiliation: Salt Lake Express

Subject: Please delay full role out

Comment:

I propose to amend the legacy engine provisions in the Omnibus regulation to provide additional compliance flexibility to allow manufacturers to produce and certify greater numbers of 2024 through 2026 MY legacy engines, while also ensuring the proposed amendments will not reduce the emissions benefits of the Omnibus regulation.

I 100% support the idea of cleaning up emissions, although we must not do so in a way that puts an undue burden on manufacturers and working Americans. Many older vehicles still have a lot of life in them. The additional cost to scrap them in favor of newer vehicles eliminates any benefit of a cleaner engine.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-09 10:47:15

No Duplicates.

**Comment 3 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Vickie

Last Name: Cole

Email Address: [vickie@americanstagetours.com](mailto:vickie@americanstagetours.com)

Affiliation: California Bus Association

Subject: CBA Comments on hdomnibus2023 - Proposed Amendments to HD Engine and Vehicle Omnibus Regul

Comment:

Please consider the attached comments from the California Bus Association

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-hdomnibus2023-AGNWMQd0WWhWD1Mj.pdf>'

Original File Name: CARB Public Comment hdomnibus2023 081723 Vickie Cole.pdf

Date and Time Comment Was Submitted: 2023-08-17 09:33:08

No Duplicates.

**Comment 4 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Greg

Last Name: Gallup

Email Address: greg@royal-coach.com

Affiliation: Royal Coach Tours

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

I attached my letter on this issue. Thank you for your consideration

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-hdomnibus2023-VjVVMIYIUGECKgFl.docx>'

Original File Name: CARB.docx

Date and Time Comment Was Submitted: 2023-08-18 09:55:15

No Duplicates.

## **Comment 5 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Earl

Last Name: Reed

Email Address: [earl@royal-coach.com](mailto:earl@royal-coach.com)

Affiliation:

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

On behalf of my company, Royal Coach Tours, 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 Motorcoach Operator, 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.

The Board's action appears to be predicated solely on heavy-duty truck engine manufacturer product plans, and we believe it is 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, Royal Coach Tours requests the Board to schedule a public hearing before moving forward with the proposed amendments to the Omnibus regulation. I may be reached at 408-279-4801 or [earl@royal-coach.com](mailto:earl@royal-coach.com), for any questions concerning this request.

Respectfully submitted,

Earl Reed  
General Manager  
Royal Coach Tours

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-hdomnibus2023-B2QHYFUmBDUCWwd3.docx>'

Original File Name: CARB Public Comment hdomnibus2023 Industry.docx

Date and Time Comment Was Submitted: 2023-08-18 10:54:31

No Duplicates.

**Comment 6 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Gary

Last Name: Buffo

Email Address: Gary@pureluxury.com

Affiliation: Pure Luxury Transportation

Subject: CARB Public Comment Letter

Comment:

Please refer to the attached document.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-hdomnibus2023-VTZdOIUmBzYHXgV1.docx>'

Original File Name: CARB Public Comment hdomnibus2023 Industry.docx

Date and Time Comment Was Submitted: 2023-08-18 10:48:13

No Duplicates.

**Comment 7 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: KAMROUZ

Last Name: FARHADI

Email Address: kami.farhadi@starlinetours.com

Affiliation: STARLINE TOURS OF HOLLYWOOD INC.

Subject: Public Hearing Request: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus R

Comment:

Please Act on this Request.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-hdomnibus2023-B3ddLgRnAD8Eawhr.pdf>'

Original File Name: Public Hearing Request.pdf

Date and Time Comment Was Submitted: 2023-08-18 15:59:43

No Duplicates.

**Comment 8 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Greg

Last Name: Gallup

Email Address: greg@royal-coach.com

Affiliation: Royal Coach Tours

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Please attached letter

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-hdomnibus2023-VjVcO1YlBDVQCQMx.docx>'

Original File Name: CARB 2.docx

Date and Time Comment Was Submitted: 2023-08-21 16:42:51

No Duplicates.

**Comment 9 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Dan

Last Name: Rodriguez

Email Address: Dan.Rodriguez@coachusa.com

Affiliation: Coach USA

Subject: Request for Public Hearing

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-hdomnibus2023-UzABcIYkBzVWD1M+.docx>'

Original File Name: CUSA MEGABUS\_CARB Public Hearing Request letter\_August 2023.docx

Date and Time Comment Was Submitted: 2023-08-22 12:54:16

No Duplicates.

**Comment 10 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Jodi

Last Name: Merritt

Email Address: [jodi.merritt@hlcharter.com](mailto:jodi.merritt@hlcharter.com)

Affiliation:

Subject: Public Hearing Request

Comment:

I would like to request a public hearing on the proposed regulations and any changes to the regulations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-24 11:11:27

No Duplicates.

**Comment 11 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Phillip

Last Name: Streif

Email Address: Philstreif@vblinc.com

Affiliation:

Subject: Public hearing

Comment:

On behalf of the motorcoach industry and bus companies that are located and operate in the United States and California, we are requesting the opportunity speak with CARB on a public platform to address some of our concerns relating to omnibus rule. We formally request a public hearing to allow for comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-24 11:29:24

No Duplicates.

**Comment 12 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Kent  
Last Name: Bianco  
Email Address: kentrba@aol.com  
Affiliation: Bianco Tours

Subject: hdomnibus2023

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-hdomnibus2023-UTJSNQEAAxVMIU8.pdf>'

Original File Name: Ca. Air Resources Board 8:24:23.pdf

Date and Time Comment Was Submitted: 2023-08-24 14:05:25

No Duplicates.

**Comment 13 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Casey

Last Name: Collier

Email Address: [ccollier@luxbusamerica.com](mailto:ccollier@luxbusamerica.com)

Affiliation: Lux Bus America

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-hdomnibus2023-BWhUfgBzUQKbeM0D.pdf>'

Original File Name: CARB - LUX - 8-24-2023.pdf

Date and Time Comment Was Submitted: 2023-08-24 15:56:16

No Duplicates.

**Comment 14 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Joe

Last Name: Magnano

Email Address: [jmagnano@sundiegocharter.com](mailto:jmagnano@sundiegocharter.com)

Affiliation: SunDiego Charter

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-hdomnibus2023-BmUFYgBzU2IHXlB9.pdf>'

Original File Name: CARB - SDC - 8-24-2023.pdf

Date and Time Comment Was Submitted: 2023-08-24 15:57:51

No Duplicates.

**Comment 15 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Robert

Last Name: Vaughan

Email Address: robert@best-vip.com

Affiliation:

Subject: PUBLIC HEARING REQUEST

Comment:

Please read attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-hdomnibus2023-UTMFCQdxUTBWM1Nl.pdf>'

Original File Name: BRW2C6FC93266C6\_003963.pdf

Date and Time Comment Was Submitted: 2023-08-28 15:10:59

No Duplicates.

**Comment 16 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Todd

Last Name: Szilagyi

Email Address: todd@best-vip.com

Affiliation:

Subject: Request for Hearing

Comment:

I have attached a letter requesting a hearing regarding proposed amendments to the heavy-duty engine and vehicle Omnibus Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-hdomnibus2023-WzNdPlQ0UHEAb1M9.doc>'

Original File Name: Hearing letter.doc

Date and Time Comment Was Submitted: 2023-08-28 15:59:57

No Duplicates.

**Comment 17 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Thom

Last Name: Peebles

Email Address: tpeebles@abc-companies.com

Affiliation:

Subject: PUBLIC HEARING REQUEST: re Heavy-Duty Engine and Vehicle Omnibus

Comment:

As a new motorcoach dealer and exclusive distributor of Van Hool motorcoaches, with multiple facilities and customers in California, ABC Companies has 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.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-hdomnibus2023-VzRdOgNwWWgGX1Ag.docx>'

Original File Name: CARB Public Comment hdomnibus2023 Industry ABC Companies Submission.docx

Date and Time Comment Was Submitted: 2023-08-30 08:23:46

No Duplicates.

**Comment 18 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Chris

Last Name: Riddington

Email Address: Chris@classiccharter.com

Affiliation: Classic Charter

Subject: Omnibus public comment

Comment:

Request a public comment to resolve passenger tour bus/motorcoach industry shortcomings of regulations regarding Nox engine availability from 2024-2027 and ACF requirements.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-30 09:07:31

No Duplicates.

## **Comment 19 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Katherine

Last Name: Zhang

Email Address: info@kingstoursf.com

Affiliation:

Subject: PUBLIC HEARING REQUEST: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus

Comment:

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 my company, King's VIP Transportation INC, 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 Motorcoach Operator, 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.

The Board's action appears to be predicated solely on heavy-duty truck engine manufacturer product plans, and we believe it is 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, King's VIP Transportation INC requests the Board to schedule a public hearing before moving forward with the

proposed amendments to the Omnibus regulation. I may be reached at 415-282-2808 or info@kingstoursf.com, for any questions concerning this request.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-08-30 13:50:15

No Duplicates.

**Comment 20 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: James

Last Name: Wheeler

Email Address: [jwheeler@source-mme.com](mailto:jwheeler@source-mme.com)

Affiliation: Municipal Maintenance Equipment

Subject: Public Hearing Request

Comment:

Please see the attached public hearing request.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-hdomnibus2023-USFTIAZIWWZWOVc0.pdf>

Original File Name: Public Hearing Request.pdf

Date and Time Comment Was Submitted: 2023-09-01 14:07:02

No Duplicates.

**Comment 21 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Brent

Last Name: Maitland

Email Address: [brent.maitland@mcicoach.com](mailto:brent.maitland@mcicoach.com)

Affiliation: MCI (Motor Coach Industries)

Subject: Request for Hearing Regarding Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Please find the request for a hearing attached from The NFI Group, parent company of Motor Coach Industries. You can reach me at 630.235.9696 with any questions. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-hdomnibus2023-Uz1QMABoU18Kawh6.pdf>'

Original File Name: NFI Group Request for CARB Low NOx Hearing August 30 2023.pdf

Date and Time Comment Was Submitted: 2023-09-03 13:26:35

No Duplicates.

## **Comment 22 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: andy

Last Name: shi

Email Address: andy@inviewtravel.com

Affiliation: Inview Travel, Inc.

Subject: PUBLIC HEARING REQUEST: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus

Comment:

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 my company, Inview Travel, 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 Motorcoach Operator / Motorcoach Manufacturer / company which supports the ongoing operation of 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.

The Board's action appears to be predicated solely on heavy-duty truck engine manufacturer product plans, 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.

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 my company, Invview Travel, 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 Motorcoach Operator / Motorcoach Manufacturer / company which supports the ongoing operation of 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.

The Board's action appears to be predicated solely on heavy-duty truck engine manufacturer product plans, 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.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-09-12 09:02:30

No Duplicates.

**Comment 23 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Ryan

Last Name: Clink

Email Address: ryan.clink@hexagongroup.com

Affiliation: Hexagon Agility

Subject: Comments on Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Hello CARB Staff,

Thank you for your time and consideration of the attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-hdomnibus2023-BXYFZlcmU3QHZAdq.pdf>'

Original File Name: September 18 CARB reply.pdf

Date and Time Comment Was Submitted: 2023-09-14 10:47:42

No Duplicates.

**Comment 24 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Robert

Last Name: Fioritto

Email Address: bob@coach21.com

Affiliation:

Subject: Public Hearing Request

Comment:

Public Hearing Request

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-hdomnibus2023-UDNTNFYIUmMBWABs.pdf>'

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2023-09-14 12:22:22

No Duplicates.

**Comment 25 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Ceyhun

Last Name: Erman

Email Address: [ceyhun.erman@temsa.com](mailto:ceyhun.erman@temsa.com)

Affiliation:

Subject: Notice of Public Comment Period on Proposed Amendments to the Heavy-Duty Engine and Vehicl

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-hdomnibus2023-UyBVMARKU25VDANn.pdf>'

Original File Name: scan\_dyaycioglu\_2023-09-15-15-36-42.pdf

Date and Time Comment Was Submitted: 2023-09-15 05:47:09

No Duplicates.

**Comment 26 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Chris

Last Name: Riddington

Email Address: chris@classiccharter.com

Affiliation:

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

See attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-hdomnibus2023-BWYCAwRoUG5WNQBu.pdf>'

Original File Name: Comments Omnibus.pdf

Date and Time Comment Was Submitted: 2023-09-15 14:05:11

No Duplicates.

**Comment 27 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: kelan

Last Name: bragg

Email Address: kelan.bragg@braggcrane.com

Affiliation:

Subject: Letter on behalf of Crane Owners Association

Comment:

Please see attached comment letter from COA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-hdomnibus2023-WzhWP109VloGYwNi.docx>'

Original File Name: COA CARB Comment Letter 09152023.docx

Date and Time Comment Was Submitted: 2023-09-15 14:14:53

No Duplicates.

**Comment 28 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Richard

Last Name: Dorr

Email Address: rich@discoverycharters.com

Affiliation:

Subject: Public Hearing Request

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-hdomnibus2023-AmFUMwd0UGEEXQJq.pdf>'

Original File Name: CARB Hearing Request.PDF

Date and Time Comment Was Submitted: 2023-09-15 14:35:32

No Duplicates.

**Comment 29 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Vickie

Last Name: Cole

Email Address: [vickie@americanstagetours.com](mailto:vickie@americanstagetours.com)

Affiliation: California Bus Association

Subject: CBA Comments on hdomnibus2023 - Proposed Amendments to HD Engine and Vehicle Omnibus Regul

Comment:

Attached please find the California Bus Association's Public Comments regarding Proposed Amendments as indicated in subject.  
Thank you, Vickie Cole, President, California Bus Association

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-hdomnibus2023-UTJVMIIhWWhSJAl8.pdf>'

Original File Name: CARBPU~1.PDF

Date and Time Comment Was Submitted: 2023-09-15 15:07:43

No Duplicates.

**Comment 30 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Ian

Last Name: Johnson

Email Address: [ian.johnson@braggcrane.com](mailto:ian.johnson@braggcrane.com)

Affiliation: Mobile Crane Operators Group (MCOG)

Subject: Mobile Crane Operators Group Comments on Amendments to the HD Engine and Vehicle Omnibus

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-hdomnibus2023-VTgBZFA+ADRRCFQ3.pdf>'

Original File Name: MCOG Comment Ltr to CARB 09152023.pdf

Date and Time Comment Was Submitted: 2023-09-15 16:58:49

No Duplicates.

## **Comment 31 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltruckng.com

Affiliation: F & L Farms Trucking Inc.

Subject: Amendments to the Heavy duty vehicle emissions regulation

Comment:

The continued assault on small business in this state is ridiculous. The members of this board are appointed at the pleasure of the current governor. They only agree with the staff that puts out the information to them. The staff is hired with the same leanings that the governor has.

These people make laws that we, as the business people have to abide by. Most are draconian in nature, as this amendment is. There is no extra money in our budgets to continually purchase new equipment. We need to be able to life cycle our current units out.

Most of the "science" comes from people who can skew it the way they want it to produce the result they desire. Our air is the cleanest it has ever been. We cannot go back to the horse and buggy as most of the people involved in this desire.

This has an impact on the cost of everything in our state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-09-15 19:45:45

No Duplicates.

**Comment 32 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Terry

Last Name: FISCHER

Email Address: terry@tcsbus.com

Affiliation: Transportation Charter Services, Inc

Subject: Proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus regulation

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-hdomnibus2023-BWYHYFQnBDUAWVU5.pdf>'

Original File Name: CARB Low NOx- Comment\_TCS\_9.18.23.pdf

Date and Time Comment Was Submitted: 2023-09-17 09:57:05

No Duplicates.

**Comment 33 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Andrew

Last Name: Soper

Email Address: asoper@linkbelt.com

Affiliation: Link-Belt Cranes

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

See Attached File

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-hdomnibus2023-AW4GbVU6ADoGYlMm.pdf>'

Original File Name: Omnibus Regulation Amendment RFH.pdf

Date and Time Comment Was Submitted: 2023-09-18 05:41:21

No Duplicates.

**Comment 34 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Gary

Last Name: Buffo

Email Address: Gary@pureluxury.com

Affiliation: Pure Luxury Transportation

Subject: CARB Public Comment Letter

Comment:

Please refer to the attached document.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-hdomnibus2023-B2tRMIYjBCNXNAd1.docx>'

Original File Name: Letter to CARB public comment.docx

Date and Time Comment Was Submitted: 2023-09-18 08:16:55

No Duplicates.

**Comment 35 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Timothy

Last Name: French

Email Address: tfrench@clpchicago.com

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA's Comments re Proposed Amendments to the HD Engine and Vehicle Omnibus Regulations

Comment:

The Truck and Engine Manufacturers Association (EMA) hereby submits the attached comments regarding the proposal of the California Air Resources Board to amend the Heavy-Duty Engine and Vehicle Omnibus Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-hdomnibus2023-VjNUPwRkAg4HYIM8.pdf>

Original File Name: EMA Comments - CARB Proposed Amendments to the HD Engine and Vehicle Omnibus Regs (Sept 18\_ 2023)(133056.7).pdf

Date and Time Comment Was Submitted: 2023-09-18 08:32:09

No Duplicates.

**Comment 36 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Samantha

Last Name: Onnen

Email Address: sonnen@sbairbus.com

Affiliation:

Subject: CARB Public Comment

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-hdomnibus2023-BWYAZ1UmV2YLUGdr.pdf>'

Original File Name: CARB letter.pdf

Date and Time Comment Was Submitted: 2023-09-18 09:45:07

No Duplicates.

## **Comment 37 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Clint

Last Name: Guth

Email Address: clint@chelaxindustries.com

Affiliation: Transportation Enthusiast

Subject: CARB & push for electric Motorcoaches

Comment:

I really hope the legislature reads & studies these replies & fully vetted comments.

Motorcoach travel is not capable of operating as a solely battery propelled unit.

The infrastructure does not exist.

The current infrastructure is significantly flawed & broken.

The batteries take up so much space there is not sufficient space for passengers belongings.

The range & charge time - even if the infrastructure was in place & worked - is too short / slow to meet the demands of motorcoach travel.

Just watch the last 4-5 videos of this electric bus attempt to travel across the US:

<https://youtube.com/@JWangvlogs>

I won't even go into the process to mine lithium, where it is mined, how it's mined, the amount of energy & water to mine, and the lifecycle & potential recycling issues in the future however our electrical grid in the US is nearly broken & highly inefficient. We are talking about taking power from power plants & shifting it through this antiquated electrical grid & then forcing all of these local agencies to ramp up their systems & then place a greater burden to the small business owner all while electricity rates are going sky high.

Long version - not so long -

1. Technology isn't there (too big & heavy batteries, no range)
2. It might work for municipalities who go in a small radius with ridership that doesn't carry luggage (city buses)
3. Plan should be 50-100 year plan - start at power plant level (likely nuclear) and then redesign grid (losing too much power in the transfer process)
4. Better studies on lithium production & recycling
5. Continue to push more efficient rail systems for cargo
6. Electrify America charging system needs complete redesign for heavy equipment - minimal to no ability to get into a charger
7. Work with Musk (or someone like him) that can help create a

rapid charging grid for heavy equipment

Thank you kindly for listening & please don't kill the motorcoach industry with an overly aggressive electric timeline because your impact on tourism & jobs will be catastrophic.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-09-18 10:02:46

No Duplicates.

**Comment 38 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Mike

Last Name: Tunnell

Email Address: mtunnell@trucking.org

Affiliation: ATA

Subject: Comments of California and American Trucking Associations

Comment:

Attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-hdomnibus2023-UmBRZ1JhBWVReQFi.pdf>'

Original File Name: 2023.CTA-ATA-CARB.Omni Amend Cmts Final.pdf

Date and Time Comment Was Submitted: 2023-09-18 10:32:20

No Duplicates.

**Comment 39 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: John

Last Name: Thomson

Email Address: john.thomson@roush.com

Affiliation: Roush Industries

Subject: Comments on Proposed Amendments

Comment:

Roush Industries hereby submits the attached comments regarding the proposal of the California Air Resources Board to amend the Heavy-Duty Engine and Vehicle Omnibus Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-hdomnibus2023-AXMGB1ElBCRSPABf.pdf>'

Original File Name: Roush Comments to Omnibus Revisions August 2023.pdf

Date and Time Comment Was Submitted: 2023-09-18 10:44:51

No Duplicates.

**Comment 40 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Michael

Last Name: Ochs

Email Address: [mochs@rvia.org](mailto:mochs@rvia.org)

Affiliation: RV Industry Association

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Attached please find the comments of the RV Industry Association regarding the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023).

Thank you.

Michael Ochs  
RVIA Director of Government Affairs

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-hdomnibus2023-WykCclA4UWNSCwBj.pdf>'

Original File Name: RVIA comments to CARB on low NOx rule 091823.pdf

Date and Time Comment Was Submitted: 2023-09-18 11:54:08

No Duplicates.

**Comment 41 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Travis

Last Name: Webb

Email Address: [twebb@aem.org](mailto:twebb@aem.org)

Affiliation: Association of Equipment Manufacturers

Subject: AEM Comments - Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Please see attached document.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-hdomnibus2023-UjFXMF0uUGEFXAJq.docx>'

Original File Name: CARB\_HD\_Omnibus\_AEM\_Comments\_2023-09-18.docx

Date and Time Comment Was Submitted: 2023-09-18 11:54:48

No Duplicates.

**Comment 42 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Jeffrey

Last Name: Grace

Email Address: jeffrey.grace@manitowoc.com

Affiliation:

Subject: The Manitowoc Company, Inc.'s Comments on Amendments to the Heavy-Duty Engine Regs

Comment:

In the attachment is The Manitowoc Company, Inc.'s comments on amendments to the heavy-duty engine and vehicle omnibus regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-hdomnibus2023-UTxSIAN1V1tSeVMM.pdf>'

Original File Name: MTW - CARB Letter on On-Road Heavy Duty Diesel Engine Regulations (2023-09).pdf

Date and Time Comment Was Submitted: 2023-09-18 11:57:10

No Duplicates.

**Comment 43 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Brandon

Last Name: Buchanan

Email Address: bbuchanan@buses.org

Affiliation: American Bus Association

Subject: ABA's Comments on Proposed Amendments to Heavy-Duty Engine and Vehicle Omnibus Regulations

Comment:

The American Bus Association (ABA) hereby submits the attached comments regarding the proposal of the California Air Resources Board to amend the Heavy-Duty Engine and Vehicle Omnibus Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-hdomnibus2023-B2ZVMVU1U14HYgZp.pdf>'

Original File Name: ABA Comment submission - CARB Omnibus Low NOx Rule Amendments Sept 2023 Final.pdf

Date and Time Comment Was Submitted: 2023-09-18 14:56:19

No Duplicates.

**Comment 44 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Kathleen

Last Name: JONES

Email Address: kathleen@mtlassentransit.com

Affiliation:

Subject: Proposed Heavy-Duty Engine and Vehicle Omnibus regulation

Comment:

Request extension of comment period to accommodate a public hearing.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-hdomnibus2023-VyRTNgRkUWxSCwcx.pdf>'

Original File Name: Scan\_65 Carb.pdf

Date and Time Comment Was Submitted: 2023-09-18 15:04:34

No Duplicates.

**Comment 45 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: James

Last Name: Wheeler

Email Address: [jwheeler@source-mme.com](mailto:jwheeler@source-mme.com)

Affiliation: Municipal Maintenance Equipment

Subject: Comment Letter

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-hdomnibus2023-VjIXPANsVG5QNFA1.pdf>'

Original File Name: Omnibus Public Comment.pdf

Date and Time Comment Was Submitted: 2023-09-18 19:56:57

No Duplicates.

**Comment 46 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: James

Last Name: Howay

Email Address: james.howay@odyne.com

Affiliation:

Subject: Comments on Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

On behalf of Joe Dalum, Founder, President, and CEO of Odyne Systems, LLC, please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-hdomnibus2023-B2hWNFwkAD1VNgbf.pdf>'

Original File Name: Odyne Comments Omnibus Sept 18 2023.pdf

Date and Time Comment Was Submitted: 2023-09-18 20:07:05

No Duplicates.

**Comment 47 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 45 Day.**

First Name: Leslie

Last Name: Hill-Starks

Email Address: set2gotrans@yahoo.com

Affiliation:

Subject: CARB

Comment:

Please see attached. Please take into consideration that this implementation could possibly wipe out most of the small businesses that operate in California.

Thank you for your consideration.

Leslie Hill-Starks  
Starks Enterprises Transportation Services Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-hdomnibus2023-AGMAZAZmUFxQNVQ1.pdf>'

Original File Name: CBA Carb Letter.pdf

Date and Time Comment Was Submitted: 2023-09-18 22:10:16

No Duplicates.

**Comment 1 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Suzanne  
Last Name: Rohde  
Email Address: SRohde@buses.org  
Affiliation: American Bus Association

Subject: Statement for October 20, 2023 - Executive Officer Hearing  
Comment:

Statement for today's hearing

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-hdomnibus2023-VDVWMgRkWVVSJ1Mn.docx>

Original File Name: ABA Statement - Suzanne Rohde.docx

Date and Time Comment Was Submitted: 2023-10-20 07:55:16

No Duplicates.

**Comment 2 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Kim

Last Name: Mesfin

Email Address: [kmesfin@affinitytruck.com](mailto:kmesfin@affinitytruck.com)

Affiliation: Affinity Truck Center

Subject: Executive Officer Hearing Meeting

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-hdomnibus2023-B2ldPllkVVlSN1U6.zip>

Original File Name: New Compressed (zipped) Folder.zip

Date and Time Comment Was Submitted: 2023-10-20 10:15:43

No Duplicates.

**Comment 3 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Thom

Last Name: Peebles

Email Address: tpeebles@abc-companies.com

Affiliation: ABC Companies - motorcoach Industry

Subject: Written Comments: re Heavy-Duty Engine and Vehicle Omnibus

Comment:

see attached document

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-hdomnibus2023-VDcHYFwvBTQLUIQk.docx>

Original File Name: CARB Public Comment ABC Companies Submission for 10\_20 Regulation Hearing.docx

Date and Time Comment Was Submitted: 2023-10-20 10:43:24

No Duplicates.

## **Comment 4 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Kim

Last Name: Mesfin

Email Address: [kmesfin@affinitytruck.com](mailto:kmesfin@affinitytruck.com)

Affiliation:

Subject: Executive Officer Hearing

Comment:

Kim Mesfin, President of Affinity Truck Center. I represent the Volvo, Mack and Autocar franchises in the Fresno, Bakersfield, Salinas and Paso Robles area. I have 140 employees 10 of which are truck salesmen that have worked with us for 3 to 43 years. Those salesmen maintain a consultative vs transactional relationships with our very diverse customer base.

CARB has regulated aspirational goals to meet our much needed air quality improvements. I feel we have gone too far, far too fast. We have regulated laws in a boardroom without consistent input from stakeholders operating in the industry and on the street. I know you speak to the Manufacturers regularly, but they are also not on the ground working with customers and the equipment. I am very hopeful that you are soliciting for these exact people to weigh in on the administration of ACF.

I have spent the last 9 months trying to understand the interplay of these three new regulations that all go into effect in 70 days. It remains difficult. No one is yet an expert. It is all new territory and we learn something new that was not considered every day. I actually feel that even CARB is not yet an expert, but these regulations are being implemented on an unsuspecting and unaware public. I have fought to get this information out to our staff and customers, but it is too much in too short a time window.

We are all behind improving our Valley air, but when our aspirational goals are technologically and financially unachievable by the forecasted timeline, it is irresponsible to press forward. CARB did not intend to regulate diesel trucks out of circulation prior to the availability of replacement zero emission technology for all classes of trucks, but that is where we are today. The July amendment we are gathered for today, involving complex mitigation credit formulas, was a great effort to make additional trucks available within our CA market place. Still too far, too fast. In May, I knew I would have zero diesel trucks available to sell. The net result was that I now have 37 trucks toward the 500 I would normally sell and 4 natural gas trucks. The rest have not been designed to certify and will not be available across all classes of truck function. I would normally have 450 trucks to start the year. The complex mitigation formulas associated with credit recapture and higher prices all calculated in arrears is too complex for the business market place.

All brands of manufacturers are stymied by the credit calculations associated with the CA registrations. Fear of penalties keeps them

excessively conservative in their CA production. The research and development dollars that go into designing, testing and certifying a .1 CARB 2024 engine, instead of putting those dollars into research and development of ZEV is dollars wasted. Customers will not pay \$20k more for a first run trial engine that emits a microscopically smaller amount of NOx and consumes more expensive diesel than the truck they can buy today. Diesel prices continue to grow.

It is disingenuous and deceptive to the public to hold tight to this emissions reduction timeline, when in reality, customers will be forced to chase loopholes and work around this stringent regulation. OEMs of all brands will maintain current production of EPA emissions vehicles allowable in all 49 states by diverting production allotted to CA dealers and trucking businesses to states outside CA. Customers will be forced to move their purchases outside the state, but the law permits them to drive those vehicles up to 90% of the time in CA. Others will continue to run older trucks or will buy used units that pollute more than today's newer units.

The CARB NOx regulation is a shell game that deceives the EJ groups and all CA residents into believing CARB is aggressively helping to clean California air.

I respectfully ask that CARB realigned CA NOx emissions with that of our other 49 states under EPA NOx regulations. Those three additional years will let CA retain small business truck purchases within CA generating necessary tax revenue and retaining jobs down stream of truck sales. The 2027 EPA regulation of .035 is even stricter than CARB's stair step approach to further regulating out the last 2% of NOx. The OEMs need that time and all those research and development dollars to create ZERO emissions vehicles across all truck classes and functions.

CA feeds the nation and needs to keep product moving from the field and warehouses to the world. We should not give that responsibility to trucking companies outside CA.

We all like our garbage to be collected, the firemen to arrive when called and our store shelves to be full. If one of our garbage companies, fire departments or ambulances wrecks a truck or has a catastrophic engine failure, there are severely limited replacement diesel trucks available for purchase in the state of CA. We will go without.

These same diesels could be mandated to utilize only renewable fuels and still operate during their useful life while keeping our communities clean, safe and our supply chain undisrupted. We need to prevent job loss in this transitional time.

We are all in on ZEV and cleaning our air. The technology with limited range, high cost and first run product failure is only available in the day cab, return to base application. 80% of the trucks I sell are sleeper trucks that haul the ag products we grow across the nation.

Without a technologically proven, affordable ZEV or near ZEV solution for all classes of diesel trucks, you cannot aggressively ban today's diesel engine without a viable alternative.

Please delay the CARB NOx Omnibus CA regulation to align with EPA

NOx 2027, so manufacturers can invest those R&D dollars into viable ZEV technologies and charging infrastructure. We must avoid the coming supply chain disruptions and job loss that will result from the legislation up for approval today.

I am here today to speak on behalf of my employees, my customers and my community members in addition to all the other board seats I represent. We need responsible change to zero and near zero emissions trucks. CARBs regulation as written today are a man made disaster with devastating impacts.

Please go back to the table and look at trucks by class and by purpose. Let's drive zero emissions trucks hard into the classes where they fit.

Look harder at alternative renewable fuel options for existing combustion engines on the road.

53% of the trucks on the road in CA today are older than 2010 clean diesel technology. Put the money and incentives into getting those old vehicle off the road and into today's clean diesel vehicle. We would instantly have 83% cleaner air.

Mr Cliff, you are responsible for the state for cleaner air. The regulations as written today will not improve the air, and will force older trucks to run and pollute longer or people to buy outside an run it.

Do not devastate my business, my salesmen's and customer's livelihoods, our state's supply chain. These tight dealer/salesman/customer relationship are exactly what you must keep in tact, so that we can help them transition to the future ZEV technology. We can do this together. Please bring us in. Not in scripted formats in hearing, but as actual consultative teams to drive this agenda.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-10-20 10:54:15

No Duplicates.

**Comment 5 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Ashley

Last Name: Porter

Email Address: aporter@tecequipment.com

Affiliation: TEC Equipment

Subject: Opposition to Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-hdomnibus2023-Vj5TMFAwVXABfgRb.pdf>

Original File Name: HEAVY -DUTY ENGINE AND VEHICLE OMNIBUS REGULATION  
10.20.2023.pdf

Date and Time Comment Was Submitted: 2023-10-20 11:00:21

No Duplicates.

**Comment 6 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Dan

Last Name: Rodriguez

Email Address: Dan.Rodriguez@coachusa.com

Affiliation: Coach USA

Subject: Testimony for Hearing

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-hdomnibus2023-B2RVMIEiUGEKUwJ2.pdf>

Original File Name: CARB Testimony\_Submitted via email\_Oct 20, 2023.pdf

Date and Time Comment Was Submitted: 2023-10-20 11:07:29

No Duplicates.

**Comment 7 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: ADAM

Last Name: VANDERBEE

Email Address: AVANDERBEE@TECEQUIPMENT.COM

Affiliation:

Subject: WRITTEN COMMENTS - TEC EQUIPMENT - ADAM VANDERBEE

Comment:

PLEASE SEE ATTACHED.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-hdomnibus2023-VTBXPgMvBGUANQYr.pdf>

Original File Name: EO-23-1-1\_Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation\_TEC Equipment\_Adam VanderBee.pdf

Date and Time Comment Was Submitted: 2023-10-20 11:12:51

No Duplicates.

## **Comment 8 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Randy

Last Name: Angell

Email Address: [randy.angell@temsa.com](mailto:randy.angell@temsa.com)

Affiliation: Temsa North America

Subject: Executive Officer Hearing for the Proposed Amendments to the Heavy-Duty Engine and Vehicle

Comment:

I want to thank you and the Air Resources Board and staff for allowing us to say a few words today.

Temsa North America was established in the US in 2009 and has become one of the top 4 OEM manufacturers of Motorcoaches in the industry today. We manufacture and currently sell four different sized vehicles (TS30, TS35, TS45 & TS45EV). We have various locations across the US, and I am here today from our facility in Burlingame CA.

As I stated above, we currently have four different coach options for our customers with one of those options being the TS45EV Electric vehicle. We have just recently finalized all testing and are using this vehicle in San Fran area now for demo trials with our customers. We support the transition to EV down the road, but we also understand all the challenges this will be to ultimately get there. From infrastructure issues to range of the coach challenges etc.

We have only been using one engine manufacturer for our three size units we currently sell here in the states. Cummins, as the engine manufacturer, is one of the options currently available in the US.

TNA currently represents about 15-20% market share to the industry today and about 25% of our sales currently are sold here in CA. Based on those figures and rising demand for our mid to full size units Temsa will be drastically affected based on the number of carb compliant engines that have been assigned from allocations somehow from Cummins. The new CARB compliant engines will not even be available before 2026. Temsa will not be able to meet the demands of our customers in CA so this will also dramatically affect them with their contracts and needs. Based on the stated above comments we believe Temsa will not have sales of more than 100 coaches based on new regulations. So again, not only affecting Temsa but the customers in CA who purchase directly from Temsa.

This is a very brief summary of who we are at Temsa, and we are here today to ask for the opportunity to continue to work with CARB to come up with a successful solution to all of the issues we are addressing here today. We support the board zero emission goals set

for heavy duty vehicles for 2045 and as Temsa being a global supplier we are always actively striving to achieve these types of goals. But in order to do this we need time and the ability to work closely with the board to achieve these types of timeframes and goals.

Thank you for the opportunity to be heard here today and we look forward to any further questions you may have.

Best Regards,  
Randy Angell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-10-20 06:07:14

No Duplicates.

**Comment 9 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023). (At Hearing)**

First Name: Brent

Last Name: Maitland

Email Address: [brent.maitland@mcicoach.com](mailto:brent.maitland@mcicoach.com)

Affiliation:

Subject: MCI Comment and Data Supporting the 10-20-23 Hearing

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ab179carbctchcd2023-VjtdOAFpUFwBbghm.pdf>

Original File Name: MCI Information to Support CARB Low NOx Hearing Information 10-20-23 .pdf

Date and Time Comment Was Submitted: 2023-10-23 14:57:03

No Duplicates.

**Comment 1 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Joseph  
Last Name: Williams  
Email Address: joew3657@gmail.com  
Affiliation: CLIMATE CHANGE

Subject: Funding

Comment:

It is not my intention to undermine the situation in the Language Of the C.A.R.B STAFF AND Work There In, but my MISSION IN THE FIGHT AGAINST POLLUTION FROM HEAVY-DUTY VEHICLES TAILPIPE SOOT IS ON GOING EVEN THOUGH MANUFACTURING OF HEAVY-DUTY VEHICLES ARE ON GOING THERE'S STILL A PRESANT AIR POLLUTION FROM THE HEAVY-DUTY SECTORS, AND POWER PLANTS! FUNDING IS EXTREMELY IMPORTANT TO MANUFACTURING OF TAILPIPE SOOT SYSTEM, AT J.W.ADVANCED TECHNOLOGY WE CONTINUE SEEKING FUNDING TO COMBAT TAILPIPE SOOT. MY MISSION STATEMENT IS HEAVY-DUTY FILTER IS THE SOLUTION TO POLLUTION . There are many different types of Vehicle TAILPIPE SOOT Aultrafine 0.3 Particulate Affecting Public health Upper Respetory System, you Can't just Turn The Exhaust TAILPIPE in a Different Direction to hide the SOOT on the Sides of the Trailer or Change the TAILPIPE to the Top of a Trailer, The Affects are the same, any VEHICLES in the Rear of the Trailer will be affected by the SOOT from Cumbuschable Engine, So I Believe that a Special Particulate Filter SYSTEM Is Our Solution To POLLUTION THANK YOU FOR THE OPPORTUNITY TO REQUEST FUNDING FOR THIS CLIMATE CHANGE AND GHG PROJECT.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-12-07 22:25:19

No Duplicates.

**Comment 2 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: David

Last Name: Pedersen

Email Address: djtpedersen@gmail.com

Affiliation:

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation

Comment:

I mostly support the proposed amendments but would like to see the offset amounts be increased from "4 [sic] times" to "as much as possible". This is because attaining the state and federal air-quality standards is only half the battle (especially since said standards aren't actually protective); the real importance of the regulation is to minimize emissions since any amount of air pollution is harmful and deadly. Requiring the greatest-achievable offsets would save lives and money and encourage manufacturers and dealers to innovate and lead in reducing emissions.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 01:47:49

No Duplicates.

**Comment 3 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Dan

Last Name: Rodriguez

Email Address: Dan.Rodriguez@coachusa.com

Affiliation: Coach USA

Subject: CARB COMMENTS

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-hdomnibus2023-B2RXMFAjADEKUwhr.pdf>

Original File Name: CARB Comments Submission\_Dec 20-2023.pdf

Date and Time Comment Was Submitted: 2023-12-20 13:53:14

No Duplicates.

**Comment 4 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Thom

Last Name: Peebles- ABC Compani

Email Address: tpeebles@abc-companies.com

Affiliation:

Subject: Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation – 15-Day Chang

Comment:

See attached file

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-hdomnibus2023-UDFTN1MxVVIVMFM8.docx>

Original File Name: ABC Companies response for 15 day.docx

Date and Time Comment Was Submitted: 2023-12-21 07:43:37

No Duplicates.

**Comment 5 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Dan

Last Name: Bogard

Email Address: warren.bogard@gm.com

Affiliation: General Motors LLC

Subject: Comments of General Motors on CARB's amendments to HD Engine and Vehicle Omnibus reg

Comment:

General Motors LLC (GM) appreciates the opportunity to offer comments in the attached document on the California Air Resources Board's (CARB) proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation, including "Amendments to the Proposed Modifications to the Diesel Engine Test Procedures" and "Amendments to the Proposed Modifications to the Otto-Cycle Engine Test Procedures".

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-hdomnibus2023-WmgCNAMwAmIELAk4.pdf>

Original File Name: 2023.12.21\_GM Comments\_LowNOxOmnibus\_Amendments.pdf

Date and Time Comment Was Submitted: 2023-12-21 08:41:27

No Duplicates.

**Comment 6 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Brandon

Last Name: Buchanan

Email Address: bbuchanan@buses.org

Affiliation: American Bus Association

Subject: Notice of Public Availability of Modified Text for the Proposed Amendments to the

Heavy-Du

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-hdomnibus2023-B2ZcOFU1V1sLbgdo.pdf>

Original File Name: ABA Comment submission - 15-Day Changes CARB Low NOx Dec 2023.pdf

Date and Time Comment Was Submitted: 2023-12-21 09:00:41

No Duplicates.

**Comment 7 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Brent

Last Name: Maitland

Email Address: [brent.maitland@mcicoach.com](mailto:brent.maitland@mcicoach.com)

Affiliation:

Subject: MCI Comment Regarding Low NOx Regulations

Comment:

Please find attached comments and proposal requesting clarification to the regulation based on ongoing discussions between CBA, Engine OE, Vehicle Manufacturers and CART.

Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-hdomnibus2023-BWtdPQZuUFxRMAR2.pdf>

Original File Name: NFI Group (MCI) Comments on Proposed CARB Low NOx Regulation Submission for 12-21-23.pdf

Date and Time Comment Was Submitted: 2023-12-21 09:04:57

No Duplicates.

**Comment 8 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Terry

Last Name: Fischer

Email Address: [terry@tcsbus.com](mailto:terry@tcsbus.com)

Affiliation: CA Charter Bus Operator

Subject: Comment on proposed amendments to the Heavy Duty Engine and Vehicle Omnibus

Regulation

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-hdomnibus2023-AWIGbwNvWGYHZFU7.pdf>

Original File Name: Comment submission - 15-Day Changes CARB Low NOx Dec 2023\_TCS.pdf

Date and Time Comment Was Submitted: 2023-12-21 10:36:02

No Duplicates.

## **Comment 9 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Chris  
Last Name: Riddington  
Email Address: chris@classiccharter.com  
Affiliation: Classic Charter

Subject: 15 Day - Heavy Duty Engine Vehicles

Comment:

Letter Attached as well.

December 21, 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 -  
15-Day Change Notice  
Dear Dr. Cliff:

On behalf Classic Charter, Inc. I am submitting the following  
comments in response to the Notice of  
Availability of Modified Text (Modifications) - Proposed Amendments  
to the Heavy-Duty Engine and  
Vehicle Omnibus Regulation (Notice), posted by the Air Resources  
Board (CARB or Agency) on  
December 6, 2023.

We have been in business since 1985, operating 25 large vehicles  
and taking over 150,000 passengers  
annually on trips throughout the United States.  
Classic Charter has 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.

For the past six months, several interested fleet operators, the  
California Bus Association and the  
motorcoach vehicle manufacturers, tried to engage with CARB on the  
Heavy-Duty Engine and Vehicle  
and Omnibus Regulation (Omnibus Regulation) to find a path toward  
compliance for California bus fleet  
operators that will not jeopardize our businesses. As the full  
title of the Omnibus Regulation states, this  
regulation impacts both engines and vehicles; however, based on our  
discussions and engagement with  
CARB to date, the Agency appears to be solely focused on working  
with original equipment  
manufacturers (OEM) of engines to the disadvantage of vehicle  
manufacturers and fleet operators, in the  
bus and truck industries. From the outset of the process to develop

this regulation, it appears CARB engaged engine manufacturers only, without reaching out or engaging vehicle manufacturers or fleet operators. Even in regard to negotiations held earlier this year in response to concerns raised with the Omnibus Regulation, CARB again relied solely on engine OEM input without considering input from or the effects of the amendments on vehicle OEMs and end user fleet operators ([https://ww2.arb.ca.gov/sites/default/files/2023-07/Final%20Agreement%20between%20CARB%20and%20EMA%202023\\_06\\_27.pdf](https://ww2.arb.ca.gov/sites/default/files/2023-07/Final%20Agreement%20between%20CARB%20and%20EMA%202023_06_27.pdf)). As was mentioned by many who submitted comments seeking a public hearing, the motorcoach industry needs additional flexibility under the Omnibus Regulation for Model Years 2024-2026, as the vehicle OEMs will not be in position to provide sufficient compliant motorcoach vehicles for sale in the California market, and my business, my passengers, my employees and the air quality of the state will suffer. Understanding this 15-Day change notice is limited to the proposed Modifications, Classic Charter also provides the following comments specific to this proceeding.

First, in reference to the proposed modifications to Subsection 1956.8(a)(2)(C)3.b.iv., of Title 13, California Code of Regulations (CCR) and the Diesel Engine Test Procedures incorporated by reference in Section 1956.8(b), of Title 13, CCR. The purpose of these modifications, per the Notice, is to further clarify the intent of these regulations for manufacturers that choose to use either Options 1 or 2. Although we appreciate CARB's intent, as fleet operators and in collaboration with the vehicle OEMs, we urge CARB to provide further clarification on legacy engines, offsets and credits. Specifically, we continue to seek explicit clarification from CARB on what "offset" means, in terms of use of credits to address legacy engine emission deficits. Motorcoach vehicle OEMs have zero-emission vehicle (ZEV) credits, and have held discussions with engine OEMs, for the purpose of using these credits to acquire legacy engines for use in their vehicles. However, we are told by both the vehicle and engine OEMs that there is confusion on whether these "credits" are acceptable for compliance with the Omnibus Regulation legacy engine options, and of more concern, the OEMs are unable to obtain clarification from CARB directly. Vehicle OEMs are pursuing every effort to prepare for compliance with the Omnibus Regulations, however this cannot be accomplished without further clarification and assistance from the Agency who authored the regulation. Several years of motorcoach vehicle sales hang in the balance and cannot proceed without additional clarity.

Next, in reference to the proposed modification to Section 1971.1, Title 13, CCR, On-Board Diagnostic (OBD) System Requirements, ABA supports the removal of the option to certify to OBD systems to California OBD requirements in Section 1971.1, and instead establish national consistency with federal requirements. The importance of setting consistent and uniform

emissions standards cannot be understated. Business operations cannot function among various jurisdictions without a uniform approach to regulation, this is particularly true for the transportation industry, which routinely crosses jurisdictions. This is why ABA is fully supportive of CARB's realignment of the Omnibus Regulation standards with the federal standards for MY 2027 and beyond. National uniformity in these matters is critical.

Again, we urge CARB to reconsider its position and provide additional flexibility in the Omnibus Regulation for the use of legacy engines in new motorcoaches for market during the MY 2024-2026 period, as was provided for transit bus operations. Motorcoaches are an environmentally responsible form of mass transportation that can assist CARB in reaching its emission targets by reducing congestion and should be promoted and incentivized, rather than limited or hindered by reducing the availability of new equipment. Classic Charter urges CARB to provide further clarification, as part of these proposed modifications, and outreach to assist both engine and vehicle OEMS in preparing to comply with the legacy options amendments to the Omnibus Regulation. We also support and encourage CARB to seek every opportunity to reconcile their emissions standards and protocols with federal emissions standards and protocols, in support of uniform national standards that allow businesses to function in interstate commerce.

Respectfully,  
Chris Riddington  
Classic Charter, Inc.  
President  
Operator and Board Member

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-hdomnibus2023-AmFTOVExBSUCd1c+.pdf>

Original File Name: Classic Charter submission - 15-Day Changes CARB Low NOx Dec 2023 sub ver.pdf

Date and Time Comment Was Submitted: 2023-12-21 12:54:03

No Duplicates.

**Comment 10 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Victoria  
Last Name: Cole  
Email Address: Vickie@americanstagetours.com  
Affiliation: CBA

Subject: Proposed Amendments to th Heavy-Duty Engine and Vehicle Omnibus Regulation  
Comment:

Please see attached our written comments from CBA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-hdomnibus2023-AHMCZ1Y2BThVDAc1.pdf>

Original File Name: SCAN\_20231221\_145014.pdf

Date and Time Comment Was Submitted: 2023-12-21 14:52:40

No Duplicates.

## **Comment 11 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Clint

Last Name: Guth

Email Address: [clint@chelaxindustries.com](mailto:clint@chelaxindustries.com)

Affiliation: Ground Transportation Consultant

Subject: Omnibus Regulation Proposal

Comment:

Good day fellow Californian -

We all want the same in life - the opportunity of life, liberty & the pursuit of happiness. In that quest we seek clean air, water, healthy food sources, the ability to provide for ourselves & our families. Technology is developing at rapid paces in all industries - some will argue faster than the public can handle (AI as an example). With that, the heavy duty engine manufacturers have worked tirelessly to create clean engine exhaust solutions. The new proposals for 2024 & newer cannot be met by any of the engine manufacturers for several years. This means new heavy duty trucks & Motorcoaches won't be able to be sold new in California for at least the next 3 years. This decline will lead to school children unable to attend extracurricular activities such as sporting events, band competitions, camps due to equipment shortages. We aren't even talking about the rising cost of shipping for goods & services from the trucking companies, purely motorcoach companies alone & their passengers will drastically suffer. The largest consuming market of motorcoach travel is likely students, traveling workers, the military & lower income earners trying to visit loved ones. Actions have consequences. Your ambitions at this time are over zealous & will negatively impact those that most need assistance. I kindly ask you to adjust your mandates to be more inclusive to all Californians & its visitors. Thank you. Clint

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-12-21 15:06:47

No Duplicates.

**Comment 12 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Michael  
Last Name: Giddens  
Email Address: [mgiddens@pacificcoachways.com](mailto:mgiddens@pacificcoachways.com)  
Affiliation: Pacific Coachways Charter Services, Inc.

Subject: Comment on proposed amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation  
Comment:

Please see attached written comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-hdomnibus2023-AWJRM1EiUWBQ3m0d.pdf>

Original File Name: 15-Day Changes CARB Low NOx Dec 2023.pdf

Date and Time Comment Was Submitted: 2023-12-21 18:38:16

No Duplicates.

**Comment 13 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Kristel

Last Name: Rietesel

Email Address: krietesel@hotmail.com

Affiliation: Bay Area Clean Air Coalition

Subject: We support the least amount of emissions possible

Comment:

We support the proposed amendments but would like to see the offset amounts be increased as much as possible, since there are no safe levels of air pollution. This would save health, lives, money, and lead to innovation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-12-21 21:55:00

No Duplicates.

**Comment 14 for Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus Regulation (hdomnibus2023) - 15-1.**

First Name: Timothy

Last Name: French

Email Address: [TFrench@clpchicago.com](mailto:TFrench@clpchicago.com)

Affiliation: Truck & Engine Manufacturers Association

Subject: HD Omnibus Regulation 2023

Comment:

Please see attached file.

Submitted on behalf of EMC by Clerk of the Board.

Comment received during 15-day comment period.

Error submitting original comment with attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-hdomnibus2023-VjNcN1EzAw8Kbwlm.pdf>

Original File Name: EMC\_Comment.pdf

Date and Time Comment Was Submitted: 2024-01-05 13:42:34

No Duplicates.