



CALIFORNIA ASSOCIATION OF SCHOOL TRANSPORTATION OFFICIALS

November 14, 2008

Clerk of the Board and Honorable Members of the
California Air Resources Board
1001 I Street
Sacramento CA 95814

RE: COMMENTS REGARDING PROPOSED TRUCK AND BUS EMISSION RULES

Honorable Members of the Board,

The California Association of School Transportation Officials urges your rejection or postponement of these rules relative to school buses that would deal a crushing financial blow to school districts and students throughout the State.

CASTO is an association of school transportation Managers, Directors, Supervisors, Driver Instructors, Mechanics, Dispatchers and Bus Drivers. We all deeply care about our air quality and the health and safety of the students we transport. We are opposed to your proposed rules, however, because the funding to implement this beneficial program does not exist. California froze school transportation operational funding over twenty-five years ago and has only occasionally granted it a COLA. Other than occasional and sporadic programs like the LESBP, the State does not provide capital funding for school transportation. Currently the State, on average, funds only 45% of the operating costs for school transportation forcing school districts to rob from their classroom funds to operate buses. As you are aware, the State budget and school funding are in their worst crisis in decades. Now is not the time to impose these rules on school districts.

A reasonable comparison is that the ARB has identified that that you will incur new costs to administer this program. Surely you have identified a revenue source to pay for this. However, you are imposing these rules on school districts without proposing a funding source for their compliance.

Although your staff has made some adjustments to the proposed rules for school buses since the initial proposals were announced, there are still elements that prove to be tremendous burdens to California school districts:

- Two Stroke diesel engines generally cannot be repowered and retrofit devices are not certified for them.
- Many 1987-93 school bus engines do not have certified retrofit devices.

- LESBP has provided funding for some bus replacements and some retrofits but falls far short of total funding necessary. Also does not account for or fund the electrical power costs to burn off soot in active devices. Approximately \$5,000 per bus per year. Spare filters and cleaning costs account for some need, but will not address all operator's needs.
- Low mileage bus exemptions should be increased to 5,000 miles per year.
- Caterpillar will no longer be manufacturing diesel engines for school buses. For buses with older Caterpillar engines, an engine repower to a newer engine may no longer be an option. Bus manufacturers may not grant the allowance (required for a variance from the original equipment engineering).
- Forcing school districts to repower, retrofit or replace school buses without providing funding will ultimately leave local school trustees with little choice but to park buses, reduce or eliminate school transportation service. This will, on average, place an additional fifty cars on the road for each bus taken out of service, causing more congestion and emissions.

These new rules do create a new and unfunded burden on all school districts in California whether they operate their own buses or contract for the service. As noted above, if the State provided funding for reasonable bus replacement, we would already be in compliance with new and clean-emission buses. That, of course, is not the case. Although we understand the need to clean up our air and address global warming, mandating new regulations that will dramatically affect school districts without providing funding is unconscionable.

We respectfully urge your vote to reject or postpone these rules until adequate funding is available to address all the school bus needs in California.

Sincerely,



Michael G. Rea
Government Relations Chairperson
707-206-9988 x11

C: Governor Arnold Schwarzenegger
State Democrat and Republican Senate and Assembly Leadership