

## **Comment 1 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Norbert

Last Name: Paas

Email Address: paasaero@aol.com

Affiliation:

Subject: Retrofit Technology

Comment:

There is technology that can be retrofitted to all existing schoolbuses including older buses. This technology does not require special fuel or new engines. SwRI documented emissions reductions are >90% DPM, >80% CO and HC. This technology is extensively used in the mining and tunneling industry. It is sold under the name Dry System.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-02-29 15:00:21

No Duplicates.

## **Comment 2 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Martin

Last Name: Ward

Email Address: mward@midplacer.k12.ca.us

Affiliation:

Subject: School Bus 08-3-4

Comment:

Please see attachment.

Martin

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/2-arb\_comment\_letter\_-\_mary\_nichols.doc'

Original File Name: ARB Comment Letter - Mary Nichols.doc

Date and Time Comment Was Submitted: 2008-03-17 07:34:33

No Duplicates.

### **Comment 3 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Geraldina  
Last Name: Grunbaum  
Email Address: ggrunbaum@baaqmd.gov  
Affiliation: Bay Area Air Quality Management District

Subject: Comments on 2008 draft LESBP Guidelines  
Comment:

On the behalf of the Bay Area Air Quality Management District, I submit the following two comments:

(1) Allow for electricity costs for active devices - the Guidelines should allow for funding to cover the electricity costs associated with cleaning devices (such as the Cleaire Horizon devices) that must be plugged into electrical outlets.

(2) Ratio of spare filters to new filters - the ratio of retrofitted devices to spare filters should be more generous. In fact, in the recent past, ARB has allowed this Air District to use LESBP retrofit funds to purchase spare filters for Cleaire Horizons at the following ratios: 1:7.5, 1:9, and 1:10.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-03-18 16:32:37

No Duplicates.

**Comment 4 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Michael

Last Name: Rea

Email Address: mrea@westcountytransportation.org

Affiliation:

Subject: California Association of School Transportation Officials

Comment:

Please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/6-sch0002.pdf'

Original File Name: sch0002.pdf

Date and Time Comment Was Submitted: 2008-03-19 12:07:58

No Duplicates.

**Comment 5 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Antonio  
Last Name: Santos  
Email Address: asantos@meca.org  
Affiliation: MECA

Subject: Comments from MECA  
Comment:

March 21, 2008

RE: ARB's Revisions to the 2008 Lower-Emission School Bus Program Guidelines and Funding Allocations

To Whom It May Concern:

Please find attached a copy of the written testimony submitted by the Manufacturers of Emission Controls Association (MECA) regarding the above-referenced rulemaking.

Thank you for your assistance.

Sincerely,

Joseph Kubsh  
Executive Director

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/7-meca\_comments\_on\_arb\_school\_bus\_guidelines\_032708.pdf'

Original File Name: MECA comments on ARB School Bus Guidelines 032708.pdf

Date and Time Comment Was Submitted: 2008-03-23 22:42:35

No Duplicates.

## **Comment 6 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Steve  
Last Name: Henderson  
Email Address: shenderson@csea.com  
Affiliation:

Subject: Agenda Item 08-3-4 School Bus Program  
Comment:

Please see attached letter. If you have problems opening it,  
please contact:  
Angela Baber  
Administrative Assistant  
California School Employees Association  
(916) 329-3626

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/8-air\_resources\_board\_guidelines\_re\_agenda\_item\_08-3-4\_school\_bus\_program.doc'

Original File Name: Air Resources Board Guidelines RE Agenda Item 08-3-4 School Bus Program.doc

Date and Time Comment Was Submitted: 2008-03-24 17:19:14

No Duplicates.

**Comment 7 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Toni

Last Name: Trigueiro

Email Address: Ttrigueiro@cta.org

Affiliation: Legislative Advocate, CTA

Subject: March 27th Board Meeting Agenda Item 08-03-4 Bus Guidelines

Comment:

Please see attached memo from the California Teachers Association regarding Agenda Item 08-3-4 School Bus Guidelines

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/9-arb\\_school\\_bus\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/9-arb_school_bus_letter.pdf)'

Original File Name: arb school bus letter.pdf

Date and Time Comment Was Submitted: 2008-03-25 15:05:16

No Duplicates.

## **Comment 8 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Stephen

Last Name: Rhoads

Email Address: srhoads@strategicadvocates.com

Affiliation: School Transportation Coalition

Subject: School Bus Guidelines

Comment:

Would you please replace my earlier attachment with this one. The attachment did not have attachment A. Thank you.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/12-2008\\_stc\\_arb\\_final\\_letter.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/12-2008_stc_arb_final_letter.doc)'

Original File Name: 2008 STC ARB Final Letter.doc

Date and Time Comment Was Submitted: 2008-03-25 21:47:19

No Duplicates.

## **Comment 9 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: David

Last Name: Norris

Email Address: [dnorris@lakeport.k12.ca.us](mailto:dnorris@lakeport.k12.ca.us)

Affiliation: Lakeport Unified School District

Subject: 2008 Lower-Emission School Bus Program Funding

Comment:

We have 3 buses 1987 and older with 3208 CAT engines. These buses are at the end of there service years. it seems pointless to spend any money at all on these buses. Old, high milage engines along with flat terrain will extreemly limit the range of these buses due to frequent cleanings of the exhaust retrofit devices, rendering these buses useless. I would incourage the board to allow as much money as possible to be spent on new buses. a better long range solution.

Sincerely,

David Norris

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-03-26 07:18:20

No Duplicates.

## **Comment 10 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Roger

Last Name: Love

Email Address: rlove@ouhsd.org

Affiliation: Oroville Union High School District

Subject: Agenda Item 08-3-4 School Bus Guidelines

Comment:

March 26, 2008

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street,  
Sacramento, California 95814

Regarding: March 27 Board Meeting  
Agenda Item 08-3-4 School Bus Guidelines

Dear Chair Mary Nichols:

School transportation is a critical issue for many school districts. The current school transportation system is clearly broken. The recently released State Auditor report (March 2007 - Report 2006-109) recommended that the California Department of Education seek legislation to revise the current law so that 1) all school districts that provide transportation services could receive funds, and 2) ensure that all school districts are funded equitably for the Home-to-School Transportation program.

As you know, California is dead last in the percentage of children that ride school buses - 16%. The national average is 54%. Our national ranking is a disgrace. The state pays less than 50% of the current cost of transportation. The state pays 0% for any increase in transportation service or cost due to 1) increase in the cost of fuel, 2) school bus replacement, 3) increase in the number of students served, or 4) providing transportation services for those students who are at risk of failing or not passing the exit exam and need to take supplemental instructional services after school or in the summer months.

School Transportation has been severely underfunded. In the last 20 years, transportation aid has grown by 40%, inflation by 90%, and K-12 expenditures per pupil by 130%. School buses are the safest form of transportation for children - safer than walking, cars, or transit buses. All new school buses will have seat belts. Using school buses means fewer accidents, injuries, and fatalities. Using school buses means less congestion, improved air quality, and less dependency on foreign oil especially with alternative fueled buses.

The 2005-06 budget provided \$12.5 million for the replacement of school buses. I was satisfied with the distribution of those

funds. Unfortunately, I have concerns with the proposed distribution of the \$200 million from Proposition 1B for the replacement of school buses and the installation of traps.

I am extremely opposed to the staff's proposal for a school district match of \$25,000. There was nothing in the voter-approved proposition or in the enabling legislation that gave ARB the authority to require such a match. If ARB wants to require a match, ARB should have introduced legislation to get that authority.

I am also opposed to the unrealistic state cost cap of \$140,000 per school bus. This will mean that those school districts that want to purchase a CNG school bus will have to pay a 'match' of \$30,000 to \$45,000. With the exception of the South Coast air quality district, which mandates CNG school buses, this will have the unintended consequence of causing school districts to purchase diesel school buses because of the lower school district match. It will also cause school districts to purchase 'fully loaded' diesel school buses that cost up to \$165,000 (state share of \$140,000 plus school district match of \$25,000). I have no problems with reasonable cost caps that reflect the actual cost of school buses.

I would recommend that ARB give that authority to the local air quality districts and have them create reasonable cost caps based on the most recent school bus purchases by the school districts in their air quality district.

Finally, I would propose that ARB recommend to the air quality districts that at least 75% of the Proposition 1B funds be used for school bus replacement. Because of the lack of funding, our school districts have one of the oldest school bus fleets in the nation. These funds will replace school buses that on the average were built more than thirty years ago. The California State Department of Education has stated that school buses should be replaced before fifteen years of service. Your staff is recommending that at least 25% of the funding be used for school traps. I believed the voters approved the \$200 million in Proposition 1B believing that the overwhelming amount of funds, if not all the funds, would go for school bus replacement.

The school transportation programs in my school districts are severely underfunded. The imposition of a \$25,000 match may mean that many of our school districts will not be able to replace their old school buses. Thank you.

Roger Love  
Oroville Union High School District  
Transportation Department

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2008-03-26 09:58:19

No Duplicates.

**Comment 11 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Dave

Last Name: Cogdill

Email Address: Non-web submitted comment

Affiliation:

Subject: California State Senate- Senator Cogdill

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/17-schoolbus0003.pdf>'

Original File Name: schoolbus0003.pdf

Date and Time Comment Was Submitted: 2008-03-26 11:59:13

No Duplicates.

**Comment 12 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Jean

Last Name: Fuller

Email Address: Non-web submitted comment

Affiliation:

Subject: California State Senate- Senator Fuller

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/18-schoolbus0001.pdf>'

Original File Name: schoolbus0001.pdf

Date and Time Comment Was Submitted: 2008-03-26 12:00:49

No Duplicates.

**Comment 13 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Santiago

Last Name: Jackson

Email Address: Non-web submitted comment

Affiliation:

Subject: LA Unified School District

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/20-schoolbus0004.pdf>'

Original File Name: schoolbus0004.pdf

Date and Time Comment Was Submitted: 2008-03-26 12:24:10

No Duplicates.

**Comment 14 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: John

Last Name: Clements

Email Address: clements-j@kcsud.com

Affiliation:

Subject: Kings Canyon Unified Transportation

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/22-schoolbus0005.pdf>'

Original File Name: schoolbus0005.pdf

Date and Time Comment Was Submitted: 2008-03-26 12:31:04

No Duplicates.

**Comment 15 for 2008 Lower-Emission School (schoolbus08) - Non-Reg.**

First Name: Julian

Last Name: Imes

Email Address: Julian.Imes@Donaldson.com

Affiliation:

Subject: STATEMENT FROM DONALDSON COMPANY, INC

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/23-schoolbus.pdf>'

Original File Name: schoolbus.pdf

Date and Time Comment Was Submitted: 2008-03-26 12:34:31

No Duplicates.

**Comment 16 for 2008 Lower-Emission School (schoolbus08) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 17 for 2008 Lower-Emission School (schoolbus08) - 45 Day.**

First Name: David

Last Name: Walrath

Email Address: Non-web submitted comment

Affiliation:

Subject: Small School Districts Association

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/26-ssad0001.pdf>'

Original File Name: ssad0001.pdf

Date and Time Comment Was Submitted: 2008-03-26 18:16:45

No Duplicates.

**Comment 18 for 2008 Lower-Emission School (schoolbus08) - 45 Day.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Air Quality

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/27-bay0001.pdf>'

Original File Name: bay0001.pdf

Date and Time Comment Was Submitted: 2008-03-26 18:20:19

No Duplicates.

**Comment 19 for 2008 Lower-Emission School (schoolbus08) - 45 Day.**

First Name: Michael

Last Name: Villines

Email Address: Non-web submitted comment

Affiliation:

Subject: Assembly California Legislature- Michael Villines

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/28-am0001.pdf>'

Original File Name: am0001.pdf

Date and Time Comment Was Submitted: 2008-03-26 18:24:17

No Duplicates.

## **Comment 1 for 2008 Lower-Emission School (schoolbus08). (At Hearing)**

First Name: Bernie

Last Name: Orozco

Email Address: Non-web submitted comment

Affiliation:

Subject: Sempra Energy

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/29-bernie\\_orozco.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/29-bernie_orozco.pdf)

Original File Name: Bernie Orozco.pdf

Date and Time Comment Was Submitted: 2008-04-03 09:12:06

No Duplicates.

## **Comment 2 for 2008 Lower-Emission School (schoolbus08). (At Hearing)**

First Name: Kirk

Last Name: Hunter

Email Address: Non-web submitted comment

Affiliation:

Subject: Southwest Education Support Center

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/30-kirk\\_hunter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/30-kirk_hunter.pdf)

Original File Name: Kirk hunter.pdf

Date and Time Comment Was Submitted: 2008-04-03 09:16:57

No Duplicates.

### **Comment 3 for 2008 Lower-Emission School (schoolbus08). (At Hearing)**

First Name: Stephen

Last Name: Rhoad

Email Address: Non-web submitted comment

Affiliation:

Subject: California's School Transportation Crisis

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/31-stephen\\_rhoad.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/31-stephen_rhoad.pdf)

Original File Name: Stephen Rhoad.pdf

Date and Time Comment Was Submitted: 2008-04-03 09:52:07

No Duplicates.

## **Comment 4 for 2008 Lower-Emission School (schoolbus08). (At Hearing)**

First Name: Sam

Last Name: Aanestad

Email Address: Non-web submitted comment

Affiliation:

Subject: California State Senate

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/32-sam\\_aanestad.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/32-sam_aanestad.pdf)

Original File Name: Sam Aanestad.pdf

Date and Time Comment Was Submitted: 2008-04-03 09:52:39

No Duplicates.

## **Comment 5 for 2008 Lower-Emission School (schoolbus08). (At Hearing)**

First Name: Jack P.

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area AQMD

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/33-jack\\_broadbent.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/33-jack_broadbent.pdf)

Original File Name: Jack Broadbent.pdf

Date and Time Comment Was Submitted: 2008-04-03 09:53:16

No Duplicates.

**Comment 1 for 2008 Lower-Emission School (schoolbus08) - 15-1.**

First Name: Tom

Last Name: Carroll

Email Address: tcarroll@suhd.net

Affiliation: Shasta Union High School district

Subject: Lower Emission School Bus Program

Comment:

There isn't sufficient information in the text of the proposed changes to understand the intent. Can you provide more information, perhaps an example of they type of project that can be consiered. Thank you.

Tom Carroll

SUHSD Transportation Dept.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-30 16:20:35

No Duplicates.

## **Comment 2 for 2008 Lower-Emission School (schoolbus08) - 15-1.**

First Name: Richard

Last Name: Stafford

Email Address: Non-web submitted comment

Affiliation:

Subject: Wilsona School District

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/schoolbus08/35-rich.pdf>

Original File Name: RIch.pdf

Date and Time Comment Was Submitted: 2008-07-08 16:50:08

No Duplicates.