**California Air Resources Board “Development of the FY 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program”**

**Comment on the Zero-Emission Bus Pilot Commercial Deployment Project**

**Comment Submitted by the Clinton Global Initiative Vehicle-to-Grid EV School Bus Commitment Team**

**June 20, 2016**

The Clinton Global Initiative Vehicle-to-Grid EV School Bus Commitment Team submitted two previous comments to the 2016-17 Low Carbon Transportation Funding Plan docket, both in favor of increasing the amount of funding devoted to zero-emission school buses. In the interim, new research has brought a relevant fact to light: school buses in aggregate burn more fuel – and by logical extension emit a greater quantity of pollutants -- than do transit buses.

The key factors in the calculation are as follows:

* The total number of transit buses in operation in the U.S. is 67,000[[1]](#footnote-1)
* The total number of school buses in operation in the U.S. is 480,000[[2]](#footnote-2)
* On average, transit buses travel a distance per year that is almost three times greater than school buses (34,000 miles vs. 12,000 miles)[[3]](#footnote-3)
* Transit buses typically have fuel economy of 3-4 miles per gallon while school buses typically have fuel economy of 7-8 miles per gallon [[4]](#footnote-4)

When the arithmetic is done to calculate the amount of fuel consumed by each fleet, it is revealed that the national school bus fleet consumes approximately 770 million diesel-gallon-equivalents (DGE) of fuel, while the transit bus fleet consumes approximately 650 million DGE.

This conclusion further undermines any argument that might exist in favor of a proposal scoring system that favors transit buses at the expense of school buses. It also supports our previous recommendation that the Air Resources Board allocate half of the $42M designated for support of zero-emission buses specifically to fund zero-emission school bus commercialization projects.

1. Public Transportation Fact Book. 2013. American Public Transportation Association. P. 16. Figure is for 2011. Fleet growth in the interim is assumed to be modest. [↑](#footnote-ref-1)
2. American School Bus Council. <http://www.americanschoolbuscouncil.org/issues/environmental-benefits> [↑](#footnote-ref-2)
3. U.S. Department of Energy, [Alternative Fuels Data Center](http://www.afdc.energy.gov/data/10309). Derived from [Federal Highway Administration](http://www.fhwa.dot.gov/policyinformation/statistics/2013/) Table VM-1 and [American Public Transit Association's Public Transportation Fact Book](http://www.apta.com/resources/statistics/Documents/FactBook/2014-APTA-Fact-Book.pdf) Tables 6, 7, and 20. [↑](#footnote-ref-3)
4. Op cit. U.S. Department of Energy [Alternative Fuels Data Center](http://www.afdc.energy.gov/data/10310). [↑](#footnote-ref-4)