

November 16, 2023

Clerk's Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Durham School Service's response to public comment on the Proposed Fiscal Year 2023-24 Funding Plan for Clean Transportation Incentives

To the Members of the Air Resources Board:

Thank you for the opportunity to provide comments regarding the subject matter noted above. National Express, operating as Durham School Services, is one of the largest school bus transportation providers in North America with more than 15,000 vehicles operating daily. As one of the leading providers in the State of California, we serve our school district partners with more than 2,000 school buses, driving more than one million miles annually. Our goal is to operate a 100% zero emission fleet by 2035, including all buses serving our customers in California; however, we will not be able to meet this goal for our customers without access to funding from the State.

Over the past several months, we've had the opportunity to meet with members of CARB, CEC and various legislators to discuss the challenges of school bus electrification without equitable funding. We have worked with key members of each organization to educate folks on the cost structure of contracted student transportation and how the proposed Fiscal Year 2023-24 Funding Plan for Clean Transportation Incentives will unfairly penalize school districts that have chosen to contract with third-party services like Durham School Services. We've also illustrated the fact that contractors are exposed to the same pricing challenges associated with electric school buses and the required infrastructure. These increased costs will translate to higher costs for our school district partners without access to funding. This will result in students served by Durham School Services not having access to emissions free school bus transportation that other students in the state will.

In many cases, these school districts elected to contract services to a third party as a means to save money, but will now face increased costs due to their ineligibility to receive funding from the \$375M Public Schools Program. Many of these schools reside in disadvantaged communities and will be subject to further inequity through the proposed administration of the program's funds. School districts who contract transportation services are under the same mandate enacted by AB 579 (Ting) earlier this year as every other school district in the state. That means their obligations to electrify their fleet will be required without equal support from the state under the current language in the funding plan.

Our customers should be treated the same regardless of their transportation arrangement, especially because our students in these districts deal with the same, and in some cases worse,

environmental conditions than others in the state. Students in the following districts served by Durham School Services that will be negatively affected by the current funding plan:

- Alameda Unified School District
- Auburn Union School District
- Compton Unified School District
- Covina-Valley Unified School District
- Foresthill Union Elementary SD
- Garden Grove Unified School District
- Irvine Unified School District
- Laguna Beach Unified School District
- Las Virgenes Unified School District
- Merge Risk JPA
- Nevada County Transportation Agency
- Oakland Unified School District
- Oxnard School District
- Paramount Unified School District
- Pomona Unified School District
- San Bernardino City Unified SD
- Santa Ana Unified School District

Many of the above-mentioned communities, as well as others served by fellow school bus contractors, face challenges with air quality, which should put them in the top tier of schools receiving funds for zero emission school buses, but instead, will be negatively impacted by being excluded from this funding plan.

We respectfully request the Board to consider language that will allow these disadvantaged communities equal access to the funds through the third-party operators who serve them. Equitable transportation is a cornerstone of this program; however, it can't be equitable unless all schools have equal rights to the funds, regardless of their current transportation arrangement. The Federal government and other states have adopted language which allows third party participation, and we feel CARB should consider the same.

Thank you for your consideration of our comments. We are available to answer any follow-up questions.

Sincerely,



Nicholas Voisard  
Senior Director of Electrification  
National Express/Durham School Services