June 10, 2015

California Air Resources Board

1001 I St.

Sacramento, CA 95814

Subject: Proposed FY 2015-16 Funding Plan for Low Carbon Transportation Investments and the Air Quality Improvement Program

Dear ARB Staff,

Thank you for the opportunity to provide comments on the Proposed FY 2015-16 Funding Plan for Low Carbon Transportation Investments and the Air Quality Improvement Program. We strongly support the proposed budget allocation of $65 million to the Zero-Emission Truck and Bus Pilot Commercial Deployment projects for FY 2015-2016, as this funding will provide important incentives to accelerate zero-emission technology advancement to help achieve California’s greenhouse gas emission reduction goals and benefit communities throughout the state.

First Priority Bus Sales is a division of First Priority Global, which is one of the largest and most reliable providers of specialty vehicles in the United States. Our mission is to service California school districts with high quality, environmentally friendly school buses, focusing on improved safety standards and eliminating toxic exposures to students. Children are sensitive receptors and face elevated health risks from exposures to toxic air contaminants from diesel emissions, and California has one of the oldest and dirtiest fleets of diesel school buses in the nation, disproportionately exposing Californian students to toxic air contaminants and associated health risks. First Priority Bus Sales provides a new, all-electric school bus that eliminates toxic exposures and offers a cost-effective solution to protect the health and safety of all California students, while substantially reducing GHG emissions by more than 80%, and lowering operating costs for school districts throughout the state.

We strongly support the deployment of zero-emission school buses in California and appreciate the inclusion of zero-emission school buses in the Zero-Emission Truck and Bus Pilot Commercial Deployment projects. Funding zero-emission school bus projects will help accelerate the rate of technology deployment, reduce GHG emissions, and reduce children’s exposure to diesel particulate matter.

*Specific Comments:*

1. As a potential part of the project, we support the intention of the two school bus concepts discussed in the FY 2014-15 Funding Plan – including vehicle-grid integration and school bus pooling among school districts.
2. We respectfully request that the eligible zero-emission school bus projects be broad and inclusive—not limited to the two example projects mentioned above, as limiting the project eligibility for zero-emission school buses will limit the number of zero-emission school buses deployed and hinder the associated greenhouse gas reductions, health benefits for school children, and ongoing cost savings for disadvantaged school districts.

We appreciate the opportunity to provide comments on Proposed FY 2015-16 Funding Plan for Low Carbon Transportation Investments and the Air Quality Improvement Program and appreciate the efforts of the California Air Resources Board to reduce the mobile source criteria pollutants, toxics, and greenhouse gas emissions in order to help improve air quality in communities throughout California.

Sincerely,

Alex Cherepakhov

Co-Chairman and CFO

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