



SCHOOL TRANSPORTATION COALITION

STRATEGIC EDUCATION SERVICES

1130 K St., Sacramento, CA 95814

Phone: (916) 441-3909

March 16, 2017

Lisa Williams
California Air Resources Board, Mailstop 5B
P.O. Box 2815
Sacramento, California 95812-2815

RE: Developing a Beneficiary Mitigation Plan for California's Allocation of the Volkswagen Environmental Mitigation Trust

The School Transportation Coalition supports using the \$423 million California received from Appendix D of the Volkswagen Mitigation Trust to replace California's old polluting school buses. However, we request funding for school bus replacement be set aside in a separate project category.

We ask that the funding is used to target the 5,000 oldest school buses which "...have immediate or imminent need for replacement to meet basic health-protective criteria, especially for the children riding the school buses." [California Air Resources Board (CARB) staff estimate]

Additionally, we agree with CARB staff conclusion that the problem is so great that not one single source of funding can address the problem. However, every school bus older than 20 years replaced with a 2018 model bus makes a **huge impact on the health risk for those inside and outside the bus.**

Every school bus:

- **on the road** removes an average of 30 cars off the road and from the front of schools, where children wait to be picked up.
- **replaced** removes an old bus; students riding the outdated bus
 - inhale emissions 23 to 46 times greater than the cancer risk level considered significant by the federal government, and
 - do not have seatbelts. Every bus manufactured to transport students in California after 2005 has seatbelts.

With that, we worry the proposal to group school bus replacement funding with transit and shuttle bus replacement funding will put school districts at a disadvantage, result in few school buses being replaced and have less of an impact on reducing the risk emissions pose to children's health. We see in programs where multiple industries can apply, school districts lose for multiple reasons.

- School buses innately travel fewer miles than any other industry, which transports goods or persons, as school buses only operate in the morning and afternoon.
- School districts innately have less expertise and technical support in competing for vehicle replacement funding, when compared to other industries, whose sole purpose is transportation.

Also, replacement opportunities, like the Volkswagen Settlement, are few and far between for school districts, when compared to opportunities available to transit and shuttle. Transit and shuttle both have federal resources whereas school transportation does not have any ongoing state funding dedicated to school bus replacement.

While we understand the funding must meet the NOx reduction goals, we recommend designating a third, or \$43.3 million, of the \$130 million (designated for Transit, School and Shuttle Buses) for school bus replacement. Designating \$43.3 million of the funding for school bus replacement will assure at least 123 buses are delivered to school districts, which are most capable of directly reducing the health risk NOx emissions create for children.

We thank the California Air Resources Board for your commitment to cleaning up the old dirty school buses transporting California's youth to and from school every day. We look forward to working with you, your staff and school districts in capitalizing on this opportunity to invest millions of dollars into California's children.

Should you have any questions or concerns, please do not hesitate to contact Nico Chavez at (916)441-3909 or by email at nchavez@strategicadvocates.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale F. Shimasaki", with a long horizontal flourish extending to the right.

Dale F. Shimasaki, Ph.D
On behalf of the School Transportation
Coalition