

March 25, 2008 Mary D. Nichols, Chair California Air Resources Board 1001 I Street Sacramento, CA 95814

Re: March 27 Board Meeting

Agenda Item 08-3-04 School Bus Guidelines

Dear Chair Mary Nichols,

I am the director of transportation for a 600 mi.² rural school district serving over 9000 students in southeastern Fresno County and northeastern Tulare County within the San Joaquin Valley Air Pollution Control District. School pupil transportation is critical to providing education for our students in the rural communities we serve, as over 80% of our student families are of low income.

My school district has actively worked with ARB, CEC, San Joaquin Valley APCD and the Fresno Council of Governments in replacing over one third of our school bus fleet since 1993 with cleaner diesel and compressed natural gas powered school buses. Nearly all of our diesel bus fleet has been retrofitted or re-powered to Level 1. Additionally we have obtained grant funding for natural gas fueling infrastructure sufficient to provide for our community. Recently we received Federal CMAQ funds to add nine new CNG school buses to our fleet. I am appreciative of the forward thinking agency staff who have helped in providing these programs and funds.

I am disappointed that this round of bus funding will not have CNG fuel tank replacement money for our older CNG school buses nearing the 15 year tank expiration, as mentioned on page 11 of the proposed program guidelines. Kings Canyon Unified needs to replace 20 tanks on five school buses within the next two years at an expense of nearly \$100,000.

While many of my smaller neighboring school districts desire to participate in the new round of Proposition 1B funding you are scheduled to approve, they cannot afford the proposed \$25,000 match per replacement bus being called for. Several area school districts are in current financial hardship and under the state budget deficit their financial condition is expected to worsen. While my district is in sound financial shape for the

coming year, to qualify for the 21 eligible bus replacements would require a match of \$525,000 necessitating acquiring low interest loans to facilitate this grant.

Please consider requiring no district match other than and in-kind contribution of an old school bus to be crushed. I would ask that ARB raise the cap limit to \$155,000 for a new diesel bus and \$185,000 for a new CNG bus.

My school district has looked forward to the opportunity of replacing potentially another one third of our fleet. Thank you for your consideration of this request.

Sincerely, John D. Clements

John D. Clements

Director of Transportation