



Kirk Hunter
08-3-4

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

RE: March 27th Board Meeting
Agenda Item: 08-3-4 School Bus Guidelines

On behalf of the Board of Directors of the Southwest Transportation Agency I would like to offer the following comments and suggestions regarding the proposed School Bus Guidelines.

The Southwest Transportation Agency is a Joint Powers Authority, which provides transportation for 14 school districts in Fresno County. In addition to providing home-to-school transportation for 7000 students per day, the Agency provides 1200+ extra-curricular trips traveling approximately 1.2 million miles per year. The Agency is a leader in the use and development of alternative fuels. The agency operates a total of 100 school buses of which 39 are powered by natural gas. The Agency operates the "first of its kind" 15,000 gallon L/CNG public access fueling station and is partnering with Harris Ranch in the development of a natural gas liquefaction unit.

First and foremost no money should be allocated to retrofits (glorified mufflers). Last year the Agency accepted a grant from the San Joaquin Valley Air Pollution Control District for approximately \$550,000 to install mufflers, on 31 buses. Of which \$110,000 was spent on necessary electrical upgrades to the facility to accommodate the necessary regeneration requirements of said mufflers and the purchase of a special glorified muffler-cleaning machine. Immediately following the installation of the mufflers we began experiencing numerous performance issues with the buses, which included but is not limited to; increase in electrical cost, loss of horse power, increased fuel consumption, increased oil consumption, daily regeneration (specs indicated monthly regeneration) and increased payroll cost as a result of road calls and additional maintenance. Based on the latter I can only imagine we were actually creating more pollution than the glorified mufflers are represented to reduce.

The intent of the Proposition 1B dollars was to replace school buses. Since California ranks last in the nation for operating the oldest fleet of school buses, common sense would conclude that the importance of bus replacement is obvious. The children of this state deserve a ride on the safest, most technologically advanced, seat belt equipped school bus available, not old buses equipped with glorified mufflers.

Secondly, the \$25,000 match requirement needs to be removed. It has been widely published since mid-January that California Schools are facing huge reductions in their 2008-09 budgets. Match requirements like this will only serve to limit the program. How many more hits can schools take? Especially when the Bond language did not require match funding, leading me to question the legality of the match requirement.

Lastly, if the Board condones the wasting of money on glorified mufflers, at a minimum, modify the language to allow Air Districts to spend up to 100% of their allocation on school bus replacement if they so choose, with no less than 75% being spent on school bus replacement. Giving Air Districts the option to spend 100% of the Bond dollars on glorified mufflers is unconscionable at best.

Respectfully Submitted,


Kirk Hunter, CEO

