



CALIFORNIA ASSOCIATION

OF

SCHOOL TRANSPORTATION OFFICIALS

XC: Board Members 08-3-4
Chairman JNG 03/27/08
BJ TAC
KQ MSCD LK

March 14, 2008

Honorable Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Members of the Board,

The school district transportation community is sincerely appreciative of the California electorate who approved the funding for this program. Without this funding, and because of the otherwise deplorable state of school transportation funding, school districts would not be able to replace their older buses, and work towards cleaner air for the children of California. We are also sincerely appreciative of the California Air Resources Board developing rules relative to the distribution of these funds.

There are a few significant concerns that we wish to bring to your attention with the hope that these issues are addressed and your draft rules are amended to reflect our very real needs.

1. The proposal for a school district match of \$25,000 for bus replacements from 1977 to 1986 will be difficult, if not impossible for school districts. In this time of fiscal crisis, school districts are completely eliminating non-essential spending and trying to allocate whatever funding they receive to maintain classroom programs. We fear that many school districts will not even apply for bus replacements in this fiscal environment. We strongly urge the Board to eliminate the requirement of the \$25,000 school district match.
2. It is admirable that the California Air Resources Board is encouraging exhaust retrofits for our school buses. We recognize that you will fund electrical infrastructure for some devices that operate in that fashion. Further we recognize that you propose funding spare filters and funding to clean filters, or for the purchase of a filter cleaning device. We urge you to fund the spare filters at a ratio of no less than one spare filter for every eight devices installed on buses. Retrofits cause school districts significant operational issues to include, filters needing to be cleaned more frequently than manufacturers represent (buses out of service, mechanic time to remove and replace filters), the long-term need to remove and clean the filters (short-term funding does not address this need over the life of the device or bus), and for devices that require regular plug-in to burn out the soot, the un-addressed additional cost of the electricity. All of these have become a very real, un-funded burden for school districts in California. We urge

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you to provide on-going funding for filter removal and cleaning and for electrical costs.

In addition, we understand that the California Air Resources Board is developing heavy duty emission rules that will significantly affect school districts in California. We are extremely concerned that this proposed new mandate will not be fully funded and will create an additional burden on California school districts.

The California school transportation community values the health and well-being of our children and our citizens, as well as ensuring our air is clean, as do you, however, we also want to ensure the health and well-being of our school transportation services. Unrealistic and poorly funded programs only further pressure school districts to reduce or eliminate school transportation service. As you know, bus transportation service reduces vehicle miles traveled, congestion around schools and in communities and tailpipe emissions. With school buses transporting as many as 84 students, we find ourselves in the unfortunate position of losing the opportunity to educate the next generation in responsible public transportation use and forcing them back into their family automobile.

We urge you to consider the above changes or enhancements to the Lower Emission School Bus Program.

Sincerely,



Michael G. Rea

Chair, Government Relations Committee