



November 14, 2008

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

**RE: COMMENTS REGARDING PROPOSED BUS AND TRUCK EMISSION
RULES**

Honorable Members of the Board,

West County Transportation Agency urges your rejection or postponement of these rules relative to school buses that would deal a crushing financial blow to our sixteen school district members.

West County Transportation Agency is a joint powers agreement of sixteen school districts in Sonoma County. We were formed to provide safe, cost-effective, coordinated and child-centered school transportation service in light of the State's significant reduction to school transportation operational costs. We receive about 50% of our funding from the State and the remaining comes directly from our members' classroom budgets. All of our member school districts are in declining enrollment, further impacting their funding.

In our fleet, we have four buses with two-stroke engines that cannot be repowered or retrofitted. We have a number of buses that were manufactured between 1987 and 1993 for which there are no certified retrofit devices. Most of our diesel buses are powered with Caterpillar engines. Because they are going out of business, there will be no replacement engine. Bus manufacturers most likely will not certify repowers with other engines.

We have aggressively pursued any and all grants available to modernize our fleet and address emission issues, but we will have buses that will need to be replaced, engines that will need to be repowered and retrofitted for which there are no funds available. With the State's current budget crisis, it does not appear that there will be this type of funding available for years.

Although your staff has worked to try to respond to concerns that have been raised, we are concerned that several elements will prove to be tremendous burdens to our Agency. Lower Emission School Bus Program spare filter ratios do not address the variety of sizes and types that may be necessary. Funds to clean diesel particulate filters only covers the cost for a finite period of time. The on-going cost of paying for the electricity for active filters is unfunded. We find it costs us \$5,005 per bus, per year. The LESBP only funds a small percentage of our Agency's need to come into compliance with your proposed rules. Low mileage bus exemptions should be increased to 5,000 miles per year

These rules create new and unfunded burdens on our Agency and our member school districts. If the State adequately funded school bus replacement, we would already be in compliance with new and clean-emission buses. That, of course, is not the case. Although we understand the need to clean up our air and address global warming, mandating new regulations that will dramatically affect our school districts without providing funding is unconscionable.

The State and our school districts are facing their worst budget and funding crisis in decades. This is not the time to place added burdens on school districts without funding them.

We respectfully urge your vote to reject or postpone these rules until adequate funding is available to address all the school bus needs in California.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael G. Rea", with a long horizontal flourish extending to the right.

Michael G. Rea
Executive Director

C: Board of Directors