

Martin Ward
08-11-3+4

December 8, 2008



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

**MID-PLACER PUBLIC SCHOOLS
TRANSPORTATION AGENCY**

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Dear Ms Nichols:

**RE: Agenda Item 08-11-3 Proposed Regulation s to Reduce Emission s from
In-Use On-Road Diesel Vehicles**

Mid-Placer Public Schools Transportation Agency services 7 school districts in both urban and rural environments. I am concerned about school transportation funding, safety and air quality. Unfortunately, your proposed regulation 2025 is financially flawed in terms of poor timing for the state of California and the schools of California.

The proposed regulation has the potential to scuttle school bus transportation in California. School buses provide the safest and most economical transportation to bring students to school. Without school buses, parents will be driving their children or more children will be riding bicycles, both of which place students at greater risk. The increased trips by private automobiles will have an impact on air quality as well.

The state apportionment for transportation covers 53% of Mid-Placer's expenses (2007-08). The balance must be borne by the member districts from their general funds. Increasing the cost of transportation will further pull money from schools general funds, and thence out of the classroom.

The schools are funded based on students attending class. School buses help get them to school and preserve school funding. For these reasons, reducing transportation has an impact of increasing class size.

The decisions are difficult. Just this month, we were faced with a decision of replacing a 1993 bus with 130,000 miles or replacing a failed transmission. The cost of replacing the transmission will be about \$6000. Under the proposed regulations the bus will need an active particulate filter within three years at a cost of \$16,000. Mid-Placer purchased the bus used two years ago for \$20,000 when the district merged with one of our members. Given the current economic times the decision was made that we need to spend \$6000 now to keep using this bus, even if it means only be able to use it for the next couple of years.

Two months ago, we chose to replace an engine in a bus with 450,000 miles because the Agency and its member districts cannot afford to replace the entire bus.

The LAO predicts it could be as long as 2013-14 before schools transportation funding returns to its present levels. Therefore, we can expect our members to continue to feel the financial constraints that we are feeling today.

Diesel particulate filters are good idea for 2004 model year and newer engines. The state's focus should be on replacing old buses, not just retrofitting. For these reasons Mid-Placer opposes the inclusion of school buses in the retrofit plans as proposed in 2025.

The School Transportation Coalition will be sending you a well reasoned letter that further covers the economic and operational concerns, so I will not repeat the same information here. I urge you to consider the following recommendations for inclusion in your staff proposal:

1. The first priority of ARB and the regulations should be read on replacing the old school buses in the state.
2. The implementation of 2025 regulations should be contingent on available funding.
3. ARB and the education community should be working together to obtain additional funding for school transportation and transit.
4. School bus portion of the regulations should be delayed until the state can afford it.

Sincerely,



Martin J. Ward
Chief Executive Officer
Mid-Placer Public Schools Transportation Agency