

## DOCKETED

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*Comment Received From: Nicholas Chavez*

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## **School Transportation Coalition Comments on School Bus Replacement**

*Additional submitted attachment is included below.*



# SCHOOL TRANSPORTATION COALITION

STRATEGIC EDUCATION SERVICES

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February 28, 2018

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: 18-MISC-02: Program Concept Workshop for Bus Replacement, ECAA-ED & Prop 39

The School Transportation Coalition appreciates the repurpose of Prop 39 funds to replace California's aging school bus fleet and the opportunity to offer our feedback to the School Bus Replacement Program Proposal.

**The selection process for school buses should not consider past year mileage.**

Districts use their highest polluting buses the least to protect the environment, but more importantly, the lungs of the students in the bus and out. Basing awards on last year's mileage incentivizes school districts to run their oldest buses as much as possible, or fear missing out on bus replacement funding.

**Buses owned by districts, but operated by JPA's, should be eligible to apply.**

A Joint Power Agreement (JPA) forms when multiple school districts choose to consolidate their transportation departments into one multidistrict transportation operation. Schools choose to form JPAs for efficiency. In doing so, JPAs run their buses fewer miles than the sum of the miles run by individual member districts providing transportation to students. Similar to their member districts, JPAs are government agencies, are held to similar reporting standards, and have trouble replacing buses without state support.

SB 110 specifies *school districts and county offices of education* as eligible applicants. We ask that eligible applicants be allowed to apply for bus replacement, regardless if the applicant or a government agency is providing transportation with the applicant's bus[es]. The applicant's students are exposed to the bus emissions regardless of who provides the service.

We appreciate the opportunity to offer our comments and look forward to participating and working with staff in developing the Prop 39 School Bus Replacement Program.

Should you have any questions or concerns, please do not hesitate to contact Nico Chavez at (916)441-3909 or by email at [nchavez@strategicadvocates.com](mailto:nchavez@strategicadvocates.com).

Sincerely,

Dale F. Shimasaki, Ph.D  
On behalf of the School Transportation  
Coalition