



Air Pollution Control Board

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May 7, 2007

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Mr. David Higgins, Foreman
2006-2007 Grand Jury
County Hall of Justice
330 W. Broadway, Suite 477
San Diego, CA 92101

Dear Mr. Higgins:

Thank you for the opportunity to provide comments on the San Diego County Grand Jury Report: "School Bus Emissions – You Take My Breath Away." Programs that reduce toxic diesel emissions from school buses are important to the health of schoolchildren exposed to these emissions as well as to the general public. We are pleased the Grand Jury has studied efforts to reduce these harmful emissions and suggested ways to improve related programs. We offer the following responses to the Grand Jury findings and recommendations.

Finding 1 - The Air Pollution Control District agrees with this finding.

Finding 2 - The Air Pollution Control District agrees with this finding.

Finding 3 - The fourth sentence states "San Diego County APCD has received and distributed to volunteer school districts \$8 million since 2000". The APCD has received and distributed \$13 million since 2000. This should be corrected in Finding 3 and elsewhere in the report.

Recommendation 07-15 – This recommendation states that the Air Pollution Control District should "Adjust its priorities for distribution of EPA air quality improvement funds to improve local school district diesel bus fleets." Thus far, all federal EPA funding provided to the Air Pollution Control District to reduce diesel emissions from school buses has been provided through competitive grants from EPA's Clean School Bus U.S.A. program. This program provides very specific guidelines to the Air Pollution Control District for allocating the funding. Accordingly, the Air Pollution Control District suggests that Recommendation 07-15 be revised as follows: "Continue to distribute EPA Clean school Bus U.S.A. funds to improve local school district diesel bus fleets."

Recommendation 07-16 – This recommendation states that the Air Pollution Control District should "Inform school districts in detail about potential district funding and guidelines changes

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that could assist less affluent school districts to improve fleet emission levels.” Since 2001, there have been a number of programs administered by the Air Pollution Control District to reduce diesel emissions from school buses. For each program, the Air Pollution Control District has initiated extensive efforts to inform all San Diego County school districts of the availability of the funds, the requirements of each program, and how to apply for the funding. These efforts included letters, e-mails, and phone calls as well as workshops. The Air Pollution Control District will continue to seek all possible school bus emission reduction funding opportunities. Accordingly, the Air Pollution Control District suggests the recommendations be revised as follows: “Continue to inform school districts in detail about potential district funding and guidelines changes that could assist less affluent school districts to improve fleet emissions levels.”

Recommendation 07-17 – This recommendation states that the Air Pollution Control District should “Advise San Diego County School Districts that older, polluting school buses that were replaced with new low polluting buses should be removed from the road.” Currently, guidance for administering the State Lower Emission School Bus Program administered by the Air Pollution Control District requires that older, polluting school buses that are replaced by new buses be permanently removed from use. The one exception is when a school district replaces a bus that is newer (cleaner) than a bus in another school district – the guidelines allow the Air Pollution Control District to use the newer bus to replace the older (dirtier) bus in the other school district. However, the dirtier bus that is replaced must be permanently removed from use. This further helps reduce diesel school bus emissions. The Air Pollution Control District disagrees with Recommendation 07-15 because State guidelines already require buses that are replaced to be removed from use and this is the standard practice of the Air Pollution Control District.

Thank you for considering our comments. If you have any questions, please call me at (858) 586-2700.

Sincerely,



RAYMOND A. FERNANDEZ, Acting Director
Air Pollution Control District

RAF:RJS:nt