



**Transportation**  
2748 FM 518 E.  
League City, TX 77573  
281-284-0600

Submitted via email to [VWsettle@tceq.texas.gov](mailto:VWsettle@tceq.texas.gov)

March 19, 2018

Commissioner Jon Niermann  
Texas Commission on Environmental Quality  
Air Quality Division  
Implementation Grants Section, MC-204  
P.O. Box 13087  
Austin, TX 78711-3087

Re: VW Settlement

Dear Commissioner Niermann,

The Environmental Mitigation Trust (EMT) presents Texas with the opportunity to reduce smog-forming nitrogen oxide ("NOx") emissions and to accelerate the clean-up of older, dirtier diesel buses, especially in communities that have been disproportionately burdened by these vehicles. As the Director of Transportation for Clear Creek Independent School District, I believe that propane school buses offer a cost-effective strategy to reduce NOx emissions and improve public health.

As a district responsible for the daily well-being of 41,000 students, we find it a priority to minimize their exposure to avoidable toxins within the learning environment. These cleaner buses are getting very close to eliminating our student's exposure to emissions such as NOx and others that are associated with pre-2007 diesel buses, including increased asthma emergencies, bronchitis, and school absenteeism, especially among asthmatic children.<sup>1</sup>

Today's propane school buses also effectively eliminate diesel particulate matter emissions that are associated with cancer and thousands of premature deaths nationwide every year. These vehicles are also a safe transportation solution because propane is non-toxic, non-carcinogenic and non-corrosive, and because their vehicle fuel tanks are 20 times more puncture-resistant than gasoline or diesel tanks.<sup>2</sup>

Equally as important, propane school buses are a smart investment for Texas because of the tremendous fiscal benefits they yield, including fuel cost reductions of 60 percent per gallon and operations and maintenance savings of \$0.37 per mile, as compared to diesel.<sup>3</sup> We thus believe

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<sup>1</sup> Adar, S. et al. "Adopting Clean Fuels and Technologies on School Buses. Pollution and Health Impacts in Children." *ATS Journals*, Volume 191, Issue 12. <http://www.atsjournals.org/doi/abs/10.1164/rccm.201410-1924OC#.WA-HINUrJhE>, June 15, 2015.

<sup>2</sup> "Propane Autogas – Safe and Reliable." Blue Bird. <https://www.blue-bird.com/blue-bird/Propane-is-safe.aspx>.

<sup>3</sup> "Propane Testimonials." Blue Bird. <http://www.blue-bird.com/blue-bird/propane-testimonials.aspx>.



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that propane school bus projects will provide the most comprehensive and sustainable suite of benefits for our district and other districts across the state.

Propane is a proven and easy-to-integrate transportation solution, provides reduced operating costs for budget-constrained school districts, and drastically improves the quality of the air which our students breathe on a daily basis. We hope to support Texas' continued transition to a better air quality future with the purchase and deployment of propane buses and offer our support as the planning process moves forward. Should you have any follow-up questions, please reach out to me at the contact information below.

Sincerely,

A handwritten signature in black ink that reads "Ezell Brown".

Mr. Ezell Brown  
Director of Transportation  
Clear Creek Independent School District  
[REDACTED] / 281.284.0610