July 3, 2018

TCEQ
Volkswagen Environmental Mitigation Trust

RE: Comments Exclusively Relating to School Buses

To Whom It May Concern:

I offer the following comments and suggestions regarding school bus replacement for Texas School Districts involving the VW Environmental Mitigation Trust:

- Allow School Buses to qualify for replacement funding if they are over 5 years old, with over 90,000 miles, instead of exclusively by age.
- Allow diesel buses to qualify for replacement funding if they are being replaced by gasoline, propane, or lpg, if at least 3 years old with over 60,000 miles.
- Eliminate any requirement that the buses have been on a regular route. When extracurricular trips are involved, spare buses are used on the regular route, or are sent on the trip; either way, they are used regularly. The criteria could be that the bus be currently inspected for the current and prior year and used to transport students. By replacing older, spare buses, the newer, more efficient route buses can become spares and the new, replacement buses used for the most mileage trips, whether route or extracurricular.
- Continue to allow the buses that are being replaced to be crushed without the extra costs of drilling the engine, etc.

Thank you for your consideration of these comments.

Very truly yours,

George Talbert
Chief Operations Officer