

BOARD OF SCHOOL TRUSTEES

Erin E. Cranor, President
Dr. Linda E. Young, Vice President
Patrice Tew, Clerk
Stavan Corbett, Member
Carolyn Edwards, Member
Chris Garvey, Member
Deanna L. Wright, Member

Pat Skorkowsky, Superintendent

September 12, 2014

State Environmental Commission
901 South Stewart Street, Suite 4001
Carson City, NV 89701

Commission;

The Clark County School District (CCSD) is requesting a reinstatement of the variance for an additional two-year period from NAC 486A.160 and 486A.180 due to financial hardship. If denied the CCSD would have to return to the practice of importing the Reformulated Gasoline from either Arizona or California, if available. This request for a variance will only affect the CCSD support fleet and not the school bus fleet, which remains powered by biodiesel fuel. The gasoline-powered vehicles make up only 31% (926 of 2980 vehicles) of the entire CCSD on road fleet. Already recognized nationally for its use of biodiesel, the CCSD relentlessly pursues the use of other alternative fuels. This includes the expanded use of Hybrid vehicles (32) as replacements for gasoline-powered sedans. Additionally, CCSD recently added six propane-powered school buses to the fleet. We are also exploring the use of propane in our support fleet vehicles.

The CCSD, as noted in various local and national news outlets continues to experience financial difficulties. The granting of the continuation of the variance on 486A.180 will free up an estimated \$108,000 per year in freight charges alone. This does not include the per gallon price difference between the rack price in Barstow, CA and Phoenix, AZ and the local rack price in Las Vegas which can range into the tens of thousands of dollars. The additional cost per vehicle (\$7,136 for the diesel engine option) on a proposed vehicle order of ¼-ton utility trucks could run as high as \$500,000 in additional fees. While in comparison to the overall CCSD budget this may appear to be relatively small amounts, but every dollar saved at the fuel pump or in a vehicle purchase is a dollar that can go into the classroom. As student education is the primary duty of the CCSD, we must make every effort to keep those needed dollars with the students.

We believe that it is in the best interest of CCSD if the variance for both 486A.160 and 180 are in place concurrently. Therefore, CCSD is also requesting a variance from 486A.160 regarding the purchasing of vehicles in an effort to alleviate any future concerns that vehicles purchased during this period will cause any problems or issues for the CCSD relating to alternative fuel use. During a recent telephone conversation with the CCAQM, they felt that receiving the variance should have no significant adverse impact on the State Implementation Plan control measures and contingency measures or the Clark County SIP. A letter stating such from CCAQM will follow request.

Should the financial status of the CCSD improve significantly, it is the intent of the CCSD to drop the variance and once again follow the statutes of NAC 486A.160 and 486A.180. Please note that CCSD is and continues to be a leader in alternative fuel use in Nevada as demonstrated by our pioneering use of biodiesel and now propane fueled school buses. If you have any questions or concerns regarding this request, please contact me at 702-799-6890.

Sincerely,



Shannon Evans
Director III- Transportation