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May 15, 2012

RECEIVED

MAY 21 2012

ENVIRONMENTAL PROTECTION

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

To Whom it May Concern:

The Clark County School District (CCSD) is requesting a two-year variance from NAC 486A.160 and 486A.180 due to financial hardship. Currently the CCSD imports the Reformulated Gasoline from either Arizona or California dependent upon the time of year. This request for variance if granted will only affect the CCSD support fleet and not the School Bus fleet, which remains powered by Biodiesel fuel. The gasoline-powered vehicles are, but 36% (976 of 2,706 vehicles) of the entire CCSD on road fleet.

The CCSD, as noted in various local and national news outlets is presently experiencing financial difficulties of an unprecedented level. As of this writing, the CCSD is preparing to deal with a budget shortfall of 40 million dollars. The granting of the variance on 486A.180 will free up an estimated \$107,000 per year. The break down on this is \$58,000 in freight charges from the two out of state locations and over \$49,000 in the per gallon price difference between the rack price in Barstow, CA and Phoenix, AZ and the local rack price in Las Vegas. (See attached documentation) While in comparison to the overall CCSD budget shortfall this appears to be a relatively small amount, every dollar saved at the fuel pump is a dollar that can go into the classroom. As this is the primary duty of the CCSD, we must make every effort to do so. In the event that the CCSD does not receive the variance, we will continue to operate as before and make the best of a difficult situation.

We believe that it is in the best interest of the CCSD if the variance is for both 486A.160 and 180 are in place concurrently. Therefore, the CCSD is 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.

We were unsuccessful in gaining written approval of the Clark County Department of Air Quality Management for this variance request. During a telephone conversation with the CCDAQM, it became apparent that, they felt that receiving the variance would have no impact locally. Their reasoning was that the fuel used from Arizona and California, is similar to the 10% ethanol fuel currently available to the public in Clark County and therefore should have little impact on the State Implementation Plan control strategy.

Should the financial fortunes 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 the CCSD is and continues to be a leader in alternative fuel use in Nevada as demonstrated by our pioneering use of biodiesel in School Buses. A recent example of the CCSD commitment to alternative fuels is our recent return to using B20 after years of B5 use. Financial considerations, forced the CCSD to move away from B20 to B5, but as the prices of the two are presently comparable, we are once again using B20. If you have any questions or concerns regarding this request, please contact me at 702-799-6890.

Sincerely,



Frank Giordano
Director III-Transportation

**Clark County School District
Transportation Department
Unleaded Fuel - Potential Savings**

Assumptions: Calculation below represents potential savings that could be achieved by purchasing Unleaded Fuel (10% Ethanol) from Local Suppliers as opposed to out of town. These savings are derived primarily from reduced Freight Charges and a historically lower OPIS Rack price in the local market. The Gallons shown below represent FY 11 purchases.

Inv Num	Date	Yard	Fuel Type	Gallons	Est		Cost / gal	Frt / gal	Total
					Cost / gal Saved	Frt / gal Saved			
624923	07/01/10	Russell	CA Unleaded (Summer)	4,119	0.02593	0.07470	106.81	307.69	414.49
624921	07/01/10	Arville	CA Unleaded (Summer)	4,117	0.02593	0.07470	106.75	307.54	414.29
627189	07/12/10	Facility Srv Ct	CA Unleaded (Summer)	4,125	0.02593	0.07470	106.96	308.14	415.10
627186	07/12/10	Eastern	CA Unleaded (Summer)	4,131	0.02593	0.07470	107.12	308.59	415.70
631260	07/26/10	Cheyenne	CA Unleaded (Summer)	4,112	0.02593	0.07470	106.62	307.17	413.79
631259	07/26/10	Eastern	CA Unleaded (Summer)	4,112	0.02593	0.07470	106.62	307.17	413.79
631813	07/28/10	Facility Srv Ct	CA Unleaded (Summer)	8,330	0.02593	0.07470	216.00	622.25	838.25
631808	07/29/10	Arville	CA Unleaded (Summer)	4,126	0.02593	0.07470	106.99	308.21	415.20
631816	07/29/10	Facility Srv Ct	CA Unleaded (Summer)	4,227	0.02593	0.07470	109.61	315.76	425.36
631817	07/29/10	Wallace	CA Unleaded (Summer)	4,175	0.02593	0.07470	108.26	311.87	420.13
631809	07/29/10	Russell	CA Unleaded (Summer)	4,132	0.02593	0.07470	107.14	308.66	415.80
631810	08/01/10	Eucalyptus	CA Unleaded (Summer)	7,861	0.02593	0.07470	203.84	587.22	791.05
632941	08/02/10	Cheyenne	CA Unleaded (Summer)	4,163	0.02593	0.07470	107.95	310.98	418.92
632945	08/02/10	Eastern	CA Unleaded (Summer)	4,163	0.02593	0.07470	107.95	310.98	418.92
634858	08/09/10	Eastern	CA Unleaded (Summer)	3,928	0.02593	0.07470	101.85	293.42	395.27
634863	08/09/10	Facility Srv Ct	CA Unleaded (Summer)	4,174	0.02593	0.07470	108.23	311.80	420.03
636056	08/12/10	Facility Srv Ct	CA Unleaded (Summer)	4,133	0.02593	0.07470	107.17	308.74	415.90
636055	08/12/10	Cheyenne	CA Unleaded (Summer)	4,134	0.02593	0.07470	107.19	308.81	416.00
638549	08/23/10	Facility Srv Ct	CA Unleaded (Summer)	4,197	0.02593	0.07470	108.83	313.52	422.34
638547	08/23/10	Russell	CA Unleaded (Summer)	4,170	0.02593	0.07470	108.13	311.50	419.63
638546	08/23/10	Eastern	CA Unleaded (Summer)	3,974	0.02593	0.07470	103.05	296.86	399.90
638548	08/23/10	Eucalyptus	CA Unleaded (Summer)	4,194	0.02593	0.07470	108.75	313.29	422.04
640192	08/27/10	Cheyenne	CA Unleaded (Summer)	4,120	0.02593	0.07470	106.83	307.76	414.60
640191	08/27/10	Arville	CA Unleaded (Summer)	4,121	0.02593	0.07470	106.86	307.84	414.70
640193	08/30/10	Eastern	CA Unleaded (Summer)	4,180	0.02593	0.07470	108.39	312.25	420.63

640194	08/30/10	Wallace	CA Unleaded (Summer)	4,180	0.02593	0.07470	108.39	312.25	420.63
641207	09/01/10	Facility Srv Ct	CA Unleaded (Summer)	8,374	0.02593	0.07470	217.14	625.54	842.68
644192	09/13/10	Cheyenne	CA Unleaded (Summer)	4,188	0.02593	0.07470	108.59	312.84	421.44
644194	09/13/10	Russell	CA Unleaded (Summer)	4,136	0.02593	0.07470	107.25	308.96	416.21
644191	09/13/10	Eastern	CA Unleaded (Summer)	4,191	0.02593	0.07470	108.67	313.07	421.74
644195	09/13/10	Facility Srv Ct	CA Unleaded (Summer)	4,135	0.02593	0.07470	107.22	308.88	416.11
644568	09/15/10	Eucalyptus	CA Unleaded (Summer)	8,382	0.02593	0.07470	217.35	626.14	843.48
645828	09/17/10	Eastern	CA Unleaded (Summer)	4,134	0.02593	0.07470	107.19	308.81	416.00
645826	09/17/10	Arville	CA Unleaded (Summer)	4,134	0.02593	0.07470	107.19	308.81	416.00
646232	09/20/10	Facility Srv Ct	CA Unleaded (Summer)	8,282	0.02593	0.07470	214.75	618.67	833.42
648082	09/27/10	Eastern	CA Unleaded (Summer)	4,187	0.02593	0.07470	108.57	312.77	421.34
648086	09/27/10	Cheyenne	CA Unleaded (Summer)	4,188	0.02593	0.07470	108.59	312.84	421.44
649872	10/01/10	Facility Srv Ct	CA Unleaded (Summer)	8,356	0.02593	0.07470	216.67	624.19	840.86
652465	10/11/10	Eastern	CA Unleaded (Summer)	4,153	0.02593	0.07470	107.69	310.23	417.92
652466	10/11/10	Russell	CA Unleaded (Summer)	4,155	0.02593	0.07470	107.74	310.38	418.12
653807	10/14/10	Facility Srv Ct	CA Unleaded (Summer)	4,059	0.02593	0.07470	105.25	303.21	408.46
653804	10/14/10	Arville	CA Unleaded (Summer)	4,204	0.02593	0.07470	109.01	314.04	423.05
653805	10/14/10	Eastern	CA Unleaded (Summer)	4,356	0.02593	0.07470	112.95	325.39	438.34
653806	10/14/10	Cheyenne	CA Unleaded (Summer)	4,203	0.02593	0.07470	108.98	313.96	422.95
657618	11/01/10	Russell	CA Unleaded (Summer)	4,153	0.02593	0.07470	107.69	310.23	417.92
659944	11/04/10	Facility Srv Ct	CA Unleaded (Summer)	8,342	0.02593	0.07470	216.31	623.15	839.46
656712	11/04/10	Eucalyptus	CA Unleaded (Summer)	4,153	0.02593	0.07470	107.69	310.23	417.92
657613	11/04/10	Arville	AZ Unleaded (Winter)	4,286	0.02593	0.07470	111.14	320.16	431.30
657615	11/04/10	Eastern	CA Unleaded (Summer)	4,283	0.02593	0.07470	111.06	319.94	431.00
657616	11/04/10	Cheyenne	CA Unleaded (Summer)	4,153	0.02593	0.07470	107.69	310.23	417.92
656714	11/04/10	Facility Srv Ct	CA Unleaded (Summer)	4,153	0.02593	0.07470	107.69	310.23	417.92
659939	11/05/10	Wallace	CA Unleaded (Summer)	4,187	0.02593	0.07470	108.57	312.77	421.34
659935	11/05/10	Eucalyptus	CA Unleaded (Summer)	4,287	0.02593	0.07470	111.16	320.24	431.40
661865	11/15/10	Laughlin	AZ Unleaded (Winter)	2,970	0.16390	0.11850	486.78	351.95	838.73
661863	11/15/10	Eastern	AZ Unleaded (Winter)	5,335	0.16390	0.11850	874.41	632.20	1,506.60
664644	11/22/10	Facility Srv Ct	AZ Unleaded (Winter)	8,416	0.16390	0.11850	1,379.38	997.30	2,376.68
665844	11/29/10	Eastern	AZ Unleaded (Winter)	5,462	0.16390	0.11850	895.22	647.25	1,542.47
665846	11/29/10	Cheyenne	AZ Unleaded (Winter)	2,993	0.16390	0.11850	490.55	354.67	845.22
668205	12/06/10	Facility Srv Ct	AZ Unleaded (Winter)	4,219	0.16390	0.11850	691.49	499.95	1,191.45
668200	12/06/10	Eastern	AZ Unleaded (Winter)	4,216	0.16390	0.11850	691.00	499.60	1,190.60
670305	12/10/10	Cheyenne	AZ Unleaded (Winter)	4,161	0.16390	0.11850	681.99	493.08	1,175.07
670329	12/14/10	Russell	AZ Unleaded (Winter)	4,161	0.16390	0.11850	681.99	493.08	1,175.07

671437	12/16/10	Eastern	AZ Unleaded (Winter)	4,218	0.16390	0.11850	691.33	499.83	1,191.16
671438	12/16/10	Facility Srv Ct	AZ Unleaded (Winter)	4,219	0.16390	0.11850	691.49	499.95	1,191.45
672696	12/22/10	Facility Srv Ct	AZ Unleaded (Winter)	8,380	0.16390	0.11850	1,373.48	993.03	2,366.51
674357	12/29/10	Eastern	AZ Unleaded (Winter)	4,098	0.16390	0.11850	671.66	485.61	1,157.28
674356	12/29/10	Arville	AZ Unleaded (Winter)	4,196	0.16390	0.11850	687.72	497.23	1,184.95
676173	01/05/11	Eucalyptus	AZ Unleaded (Winter)	4,248	0.16390	0.11850	696.25	503.39	1,199.64
676170	01/05/11	Cheyenne	AZ Unleaded (Winter)	4,255	0.16390	0.11850	697.39	504.22	1,201.61
677557	01/10/11	Facility Srv Ct	AZ Unleaded (Winter)	8,285	0.16390	0.11850	1,357.91	981.77	2,339.68
677561	01/10/11	Russell	AZ Unleaded (Winter)	4,238	0.16390	0.11850	694.61	502.20	1,196.81
677559	01/10/11	Eastern	AZ Unleaded (Winter)	4,235	0.16390	0.11850	694.12	501.85	1,195.96
681366	01/20/11	Eastern	AZ Unleaded (Winter)	4,183	0.16390	0.11850	685.59	495.69	1,181.28
681365	01/20/11	Cheyenne	AZ Unleaded (Winter)	4,182	0.16390	0.11850	685.43	495.57	1,181.00
682390	01/26/11	Facility Srv Ct	AZ Unleaded (Winter)	4,109	0.16390	0.11850	673.47	486.92	1,160.38
682387	01/26/11	Arville	AZ Unleaded (Winter)	4,209	0.16390	0.11850	689.86	498.77	1,188.62
684153	02/01/11	Eastern	AZ Unleaded (Winter)	4,233	0.16390	0.11850	693.79	501.61	1,195.40
684156	02/01/11	Facility Srv Ct	AZ Unleaded (Winter)	4,233	0.16390	0.11850	693.79	501.61	1,195.40
685432	02/07/11	Russell	AZ Unleaded (Winter)	4,140	0.16390	0.11850	678.55	490.59	1,169.14
685429	02/07/11	Cheyenne	AZ Unleaded (Winter)	4,144	0.16390	0.11850	679.20	491.06	1,170.27
685437	02/07/11	Eucalyptus	AZ Unleaded (Winter)	8,481	0.16390	0.11850	1,390.04	1,005.00	2,395.03
686953	02/09/11	Facility Srv Ct	AZ Unleaded (Winter)	8,495	0.16390	0.11850	1,392.33	1,006.66	2,398.99
686951	02/09/11	Wallace	AZ Unleaded (Winter)	4,303	0.16390	0.11850	705.26	509.91	1,215.17
686950	02/09/11	Eastern	AZ Unleaded (Winter)	4,050	0.16390	0.11850	663.80	479.93	1,143.72
689713	02/18/11	Eastern	AZ Unleaded (Winter)	4,183	0.16390	0.11850	685.59	495.69	1,181.28
689712	02/18/11	Cheyenne	AZ Unleaded (Winter)	4,183	0.16390	0.11850	685.59	495.69	1,181.28
691596	02/24/11	Facility Srv Ct	AZ Unleaded (Winter)	8,662	0.16390	0.11850	1,419.70	1,026.45	2,446.15
692617	03/01/11	Eastern	AZ Unleaded (Winter)	4,118	0.16390	0.11850	674.94	487.98	1,162.92
692614	03/01/11	Arville	AZ Unleaded (Winter)	4,216	0.16390	0.11850	691.00	499.60	1,190.60
694920	03/09/11	Russell	AZ Unleaded (Winter)	4,231	0.16390	0.11850	693.46	501.37	1,194.83
694924	03/09/11	Facility Srv Ct	AZ Unleaded (Winter)	4,232	0.16390	0.11850	693.62	501.49	1,195.12
695860	03/11/11	Cheyenne	AZ Unleaded (Winter)	3,982	0.16390	0.11850	652.65	471.87	1,124.52
695861	03/11/11	Eastern	AZ Unleaded (Winter)	4,083	0.16390	0.11850	669.20	483.84	1,153.04
697413	03/16/11	Facility Srv Ct	AZ Unleaded (Winter)	8,348	0.16390	0.11850	1,368.24	989.24	2,357.48
697417	03/17/11	Wallace	AZ Unleaded (Winter)	4,067	0.16390	0.11850	666.58	481.94	1,148.52
697415	03/17/11	Eucalyptus	AZ Unleaded (Winter)	3,970	0.16390	0.11850	650.68	470.45	1,121.13
699007	03/23/11	Arville	AZ Unleaded (Winter)	4,221	0.16390	0.11850	691.82	500.19	1,192.01
699009	03/23/11	Eastern	AZ Unleaded (Winter)	4,220	0.16390	0.11850	691.66	500.07	1,191.73
701068	03/28/11	Facility Srv Ct	AZ Unleaded (Winter)	8,341	0.16390	0.11850	1,367.09	988.41	2,355.50

700599	03/28/11	Cheyenne	AZ Unleaded (Winter)	4,072	0.16390	0.11850	667.40	482.53	1,149.93	
700600	03/28/11	Russell	AZ Unleaded (Winter)	4,271	0.16390	0.11850	700.02	506.11	1,206.13	
701830	03/30/11	Eastern	AZ Unleaded (Winter)	4,073	0.16390	0.11850	667.56	482.65	1,150.22	
701831	03/30/11	Eucalyptus	AZ Unleaded (Winter)	4,270	0.16390	0.11850	699.85	506.00	1,205.85	
704489	04/11/11	Cheyenne	CA Unleaded (Summer)	4,065	0.02593	0.07470	105.41	303.66	409.06	
704495	04/11/11	Eastern	CA Unleaded (Summer)	4,266	0.02593	0.07470	110.62	318.67	429.29	
705427	04/13/11	Facility Srv Ct	CA Unleaded (Summer)	8,531	0.02593	0.07470	221.21	637.27	858.47	
707033	04/21/11	Eastern	CA Unleaded (Summer)	4,037	0.02593	0.07470	104.68	301.56	406.24	
707036	04/21/11	Eucalyptus	CA Unleaded (Summer)	4,239	0.02593	0.07470	109.92	316.65	426.57	
709882	04/28/11	Facility Srv Ct	CA Unleaded (Summer)	8,478	0.02593	0.07470	219.83	633.31	853.14	
710405	04/29/11	Eastern	CA Unleaded (Summer)	4,337	0.02593	0.07470	112.46	323.97	436.43	
710404	04/29/11	Arville	CA Unleaded (Summer)	4,044	0.02593	0.07470	104.86	302.09	406.95	
711072	05/02/11	Cheyenne	CA Unleaded (Summer)	4,182	0.02593	0.07470	108.44	312.40	420.83	
711073	05/02/11	Russell	CA Unleaded (Summer)	4,187	0.02593	0.07470	108.57	312.77	421.34	
713378	05/11/11	Wallace	CA Unleaded (Summer)	4,177	0.02593	0.07470	108.31	312.02	420.33	
713377	05/11/11	Eastern	CA Unleaded (Summer)	4,082	0.02593	0.07470	105.85	304.93	410.77	
715182	05/13/11	Facility Srv Ct	CA Unleaded (Summer)	8,436	0.02593	0.07470	218.75	630.17	848.91	
715189	05/16/11	Eucalyptus	CA Unleaded (Summer)	8,437	0.02593	0.07470	218.77	630.24	849.02	
716374	05/18/11	Cheyenne	CA Unleaded (Summer)	4,177	0.02593	0.07470	108.31	312.02	420.33	
716376	05/18/11	Eastern	CA Unleaded (Summer)	4,180	0.02593	0.07470	108.39	312.25	420.63	
718943	05/27/11	Facility Srv Ct	CA Unleaded (Summer)	8,438	0.02593	0.07470	218.80	630.32	849.12	
719256	05/31/11	Russell	CA Unleaded (Summer)	4,178	0.02593	0.07470	108.34	312.10	420.43	
719254	05/31/11	Arville	CA Unleaded (Summer)	4,177	0.02593	0.07470	108.31	312.02	420.33	
720721	06/02/11	Eastern	CA Unleaded (Summer)	4,215	0.02593	0.07470	109.29	314.86	424.16	
720719	06/02/11	Cheyenne	CA Unleaded (Summer)	4,213	0.02593	0.07470	109.24	314.71	423.95	
723224	06/13/11	Eastern	CA Unleaded (Summer)	4,199	0.02593	0.07470	108.88	313.67	422.55	
723225	06/13/11	Facility Srv Ct	CA Unleaded (Summer)	4,204	0.02593	0.07470	109.01	314.04	423.05	
725950	06/22/11	Cheyenne	CA Unleaded (Summer)	4,183	0.02593	0.07470	108.47	312.47	420.94	
725954	06/22/11	Facility Srv Ct	CA Unleaded (Summer)	4,183	0.02593	0.07470	108.47	312.47	420.94	
727439	06/27/11	Arville	CA Unleaded (Summer)	4,176	0.02593	0.07470	108.28	311.95	420.23	
727440	06/27/11	Eastern	CA Unleaded (Summer)	4,178	0.02593	0.07470	108.34	312.10	420.43	
727981	06/29/11	Facility Srv Ct	CA Unleaded (Summer)	4,182	0.02593	0.07470	108.44	312.40	420.83	
727985	06/29/11	Wallace	CA Unleaded (Summer)	4,181	0.02593	0.07470	108.41	312.32	420.73	
								49,955.26	58,038.50	107,993.76

Assumptions: Below is 4 Week Average of OPIS Rack Price difference between Phx / Barstow vs Local.

Date	Winter			Summer		
	Phx	LV	Difference	Barstow	LV	Difference
03/01/12	3.42720	3.20910	0.21810	3.33190	3.27850	0.05340
03/08/12	3.43300	3.25700	0.17600	3.23820	3.25230	-0.01410
03/15/12	3.39690	3.24180	0.15510	3.27720	3.25360	0.02360
03/22/12	3.39790	3.29150	0.10640	3.27460	3.23380	0.04080
	4 Week Average		<u>0.16390</u>	4 Week Average		<u>0.02593</u>

Estimated Freight Savings

Winter - Phoenix Frt / gallon 0.13650
 Estimated local Frt Cost 0.01800
 Estimated Savings 0.11850

Summer - Barstow Frt / gallon 0.09270
 Estimated local Frt Cost 0.01800
 Estimated Savings 0.07470