

Sent: Thursday, August 25, 2022

Subject: IPI: Guidance for estimating annual usage for school buses impacted by school closures

IPI Team:

Since 1998, the Carl Moyer Program has filled a critical niche in California's strategy to achieve clean air. The Carl Moyer Program provides grant funding for the incremental cost of cleaner-than-required engines, equipment, and emission reduction technologies. The Carl Moyer Program complements California's regulatory program by funding emission reductions that are surplus, i.e., early and/or in excess of what is required by local, State, and federal requirements.

To ensure that emission reductions funded by the Carl Moyer Program are creditable to the State Implementation Plan, CARB requires that grants be based on the historical usage of baseline equipment. Chapter 4, Section B.5 of the *2017 Carl Moyer Program Guidelines* (Guidelines) requires air districts to estimate the historical annual usage for on-road vehicles by taking the lesser usage during 2 non-overlapping 12-month periods from within the most recent 30 months.

School bus projects are subject to the requirements of Chapter 4 of the Guidelines and so air districts must use the above method to estimate historical annual usage. However, over the last two years, schools faced unique, varied, and much more extensive closure requirements throughout the State due to public health concerns. This resulted in considerably lower historical annual usage estimates and by extension significantly reduced grant amounts.

In recognition of this challenge, CARB will allow the following flexibility:

Provided that a school district submits to its air district documentation substantiating a specific period of pandemic-related closure, air districts may evaluate the applicability of that period of time when estimating historical usage and apply an additional flexibility that will allow air districts to substitute the equivalent period of time directly prior to the 30-month period as required of the Guidelines in order to estimate historical usage. Substantiating documentation includes, but is not limited to:

- Form J-13A filled out by the school district and approved by the California Department of Education;
- Memo from the school superintendent indicating periods of closure;
- Local or regional mandates requiring school closures during a specified period of time; and/or
- Any other forms of documentation deemed necessary by the air district for evaluation of applicability.

Air districts must include this documentation in their project files, to be made available during CARB's review of State incentive programs. All other Carl Moyer Program requirements apply.

If you have questions regarding this IPI, please contact Kyle Goff at Kyle.Goff@arb.ca.gov.

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