

Urvi Nagrani

see attached file

To whom it may concern:

Motiv Power Systems would like the support the public comments already received urging for investment of VW Settlement funds into all-electric school buses. The process for engaging with the public has been one that is an open, robust and transparent process and we commend staff for their work. Motiv appreciates that the Department of Ecology was transparent in the data showing how responses ranked the importance of various categories, and we agree that school buses, shuttle buses, and transit buses should be prioritized.

Scoring System: Based on Number of Responses & Order of Importance									
Answer Options	Extremely Low	Moderately Low	Slightly Low	Medium	Slightly High	Moderately High	Extremely High	Response Count	Average Score
Class 4-8 school, shuttle, transit buses	31	15	13	44	104	115	191	513	6
Ferries, tugboats	81	17	25	45	53	66	255	542	5
Matching funds for projects eligible under the Diesel Emission Reduction Act (DERA)	61	22	39	80	84	80	124	490	5
Class 4-7 local trucks	84	27	32	103	74	88	66	474	4
Light duty zero emission vehicle supply equipment (limited to 15% of funds)	98	39	35	83	69	58	107	489	4
Class 8 local freight trucks and port drayage trucks	84	31	36	91	86	79	63	470	4
Shorepower for ocean going vessels	114	40	31	91	83	73	50	482	4
Freight switcher locomotives	120	42	50	113	67	33	42	467	3

Figure 1 taken from <https://ecology.wa.gov/Air-Climate/Air-quality/Vehicle-emissions/VW-federal-enforcement-action/VW-questions>

A plan that will emphasize the replacement of aging diesel school buses as a major focus for expenditures is appropriate because school-age children are among the most vulnerable populations to the harmful pollutants in diesel exhaust.

Electrification of school buses provides safer, cleaner, and quieter transportation for children than internal combustion engine solutions, and these funds offer a chance for the next generation of students in Washington to use state of the art technology while avoiding harmful pollutants.

As an American small business and manufacturer developing zero-emission all-electric powertrains for medium and heavy duty trucks and buses, Motiv Power Systems knows firsthand how essential good policy has been to supporting sustainable solutions deployment. Motiv’s all-electric powertrains are presently used in vehicles ranging from school and shuttle buses to delivery trucks and work trucks, allowing fleets to use zero-emission solutions that improve the local air quality, help meet climate goals, and eliminate the need for fossil fuels.

In looking at the way to establish a process to administer the funds, Motiv urges the Department of Ecology to look at one of California’s successful market based programs for commercial vehicle incentives: HVIP. One of the key benefits of the HVIP program is the first-come, first-served approach allowing a fleet to get funding when they’re ready to transition their vehicles to cleaner technologies regardless of the type of fleet. On the list of HVIP eligible vehicles there are shuttle buses, school buses, work trucks, delivery trucks, and more. This style of program is easier to administer, customer friendly, and allows air quality improvements as soon as fleets are ready to adopt the technologies. This would be a wonderful way to administer the funding for Washington’s school bus funds as it would allow school



districts to avoid some of the administrative overhead of lengthy grant processes, enabling a faster response to poor air quality.

Motiv commends the staff for their work in administering this public process and their transparency in communicating the results that guide the work in efforts to improve local air quality and mitigate the harms of diesel and NOx emissions.

Respectfully,

Urvi Nagrani

Director of Business Development, Motiv Power Systems