

June 16, 2026

Washington State Department of Ecology
Air Quality Program
Clean Fuel Standard Rulemaking

Re: Comments on Washington's Clean Fuel Standard Rulemaking

Dear Members of the Department of Ecology,

As North America's largest school bus operator, First Student is committed to advancing sustainable student transportation. I am writing to provide comments and support regarding the Clean Fuel Standard (CFS) rulemaking from the perspective of a zero-emission vehicle (ZEV) fleet operator.

About First Student

- First Student is North America's largest school bus operator, partnering with school districts to provide transportation as a contracted service, not a traditional for-profit private operator. Our business model means fleet electrification decisions are made in close coordination with public school district partners, many of whom face tight capital budgets and limited access to public-agency-only grant programs.

Experience with Clean Fuel Programs

- First Student has direct experience generating credits under Quebec's clean fuel program and is beginning to participate in clean fuel programs on the West Coast, including Washington's Clean Fuel Standard.
- We expect to generate credits through direct charging of our EV fleet and are interested in accessing infrastructure credits and advance credits as those provisions develop under Washington's program. Getting program design right on these credit pathways will determine whether the CFS functions as a meaningful electrification funding tool for contracted fleet operators like us.

Public Health and Community Benefits of Electric School Buses

- School buses serve some of the most sensitive riders: children, whose developing lungs are disproportionately harmed by diesel exhaust. Research from the EPA and the Harvard School of Public Health documents that air quality near schools and bus stops is worst in the mid-afternoon, when schools let out.
- By reducing the number of cars idling in school drop-off and pick-up zones, electric bus

service also meaningfully reduces single-occupancy vehicle trips and associated congestion and emissions around schools. We encourage Ecology to recognize and reward these benefits, and potentially other benefits like air quality improvements.

Barriers to Electrification That the CFS Can Help Address

- As a private contractor serving public school districts, First Student cannot access certain funding sources that are dedicated to public agencies. It would be beneficial to include certain agency-adjacent organizations in these opportunities, including advance crediting to access upfront funding for electrification.
- Federal transportation funding for school districts is chronically underfunded and not a top-tier priority, and recent federal policy uncertainty threatens to undermine purchasing opportunities. A statewide fund utilizing utility EV credits would be instrumental in deploying electric school buses.
- Most school buses return to a home base each night, which simplifies charging infrastructure planning, but upfront depot electrification costs are substantial without reliable, stackable incentives.

Opportunities and Asks

- First Student's contracted service model is replicable across Washington and nationally.
- We support Ecology exploring a statewide incentive structure that could stack CFS credit revenue with bus purchase rebates and infrastructure support, providing the funding certainty and upfront cost offset necessary to accelerate conversion.
- We ask that Ecology ensure the CFS credit structure is accessible to fleets serving the public, particularly schoolchildren.

Thank you for the opportunity to comment on this important rulemaking process. First Student stands ready to serve as a resource to the Department of Ecology as you finalize the program design. Please feel free to reach out to me directly if you have any questions or require further information.

Sincerely,

Kevin L. Matthews

Kevin L. Matthews
Head of Electrification
First Student, Inc