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Jacqueline Gelb
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The Honorable Bryan W. Shaw, PhD, PE
Chairman
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

Dear Chairman Shaw,

I write to encourage you to include the renewal and replacement of diesel school buses and heavy-duty trucks when the State of Texas prepares and submits its Beneficiary Mitigation Plan to the Trustee overseeing the Volkswagen Consent Decree. The \$192 million Texas is scheduled to receive for diesel mitigation activities represents a tremendous opportunity to protect the environment and improve air quality across the state.

The terms of the settlement allow Texas to seek and receive reimbursement of 100% of the purchase price of new, clean diesel-powered buses and heavy-duty trucks if they replace older, diesel powered vehicles purchased prior to 2007. Leveraging those generous terms would permit the state to renew the aging fleet of buses that transport tens of thousands of students, daily, to schools across Texas. Providing safe transport powered by the diesel engines that meet or exceed the EPA's most stringent standards would benefit our state's most vulnerable population.

Heavy-duty diesel trucks perform a myriad of critical municipal services, from hauling garbage to spreading salt and building infrastructure. Yet, budget realities mean that fleet renewal is perennially low on the list of priorities. Replacing the typically ancient trucks that keep our communities running with new, more capable and environmentally friendly trucks would benefit all taxpayers. And, since new trucks emit a tiny fraction of the pollutants produced by pre-2007 models, the measurable environmental benefits would be significant.

According to Ward's Automotive data, Texas has over 22,198 pre-1998, diesel-powered school buses and trucks on its roads. These vehicles emit at least **4 grams** of NOx per brake-horsepower hour of operation, compared with 2018-compliant diesel-powered trucks and buses, which emit less than **two-tenths of a gram** of NOx per brake-horsepower hour – or **95% less** NOx than the pre-1998 vehicles.

Because of the significant NOx reduction that can be achieved by taking these older buses and trucks off the road, I believe Texas should use these funds to subsidize replacement of the older vehicles with real-life, ready-today technologies: new, 2018 compliant, diesel, propane or gas-powered school buses, or trucks.

Thank you for your time and efforts. Please let me know if I can be of any assistance.

Sincerely,

Jacqueline Gelb