Submitted via email to VWsettle@tceq.texas.gov

October 8, 2018

Commissioner Jon Niermann
Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
P.O. Box 13087
Austin, TX 78711-3087

Re: Using Texas’ Volkswagen Settlement Funds for Clean School Buses

Dear Commissioner Niermann,

Rush Bus Centers (“Rush”), respectfully submits the following comments to the Texas Commission on Environmental Quality (“TCEQ”) on the Draft Beneficiary. The EMT funds represent a historic opportunity for Texas to improve air quality and simultaneously stimulate the Texas economy. Rush’s customer base represents the core of Texas’ transportation sector and we believe it is critical to use these funds to deploy funding programs that make an immediate and tangible impact on air quality and related public health issues. According to the TCEQ, over 50% of Texas’ NOx emissions are generated by on-road mobile sources1; therefore Rush recommends that the TCEQ use its $209 million EMT allocation to incentivize public and private fleets to replace older diesel vehicles with new, commercially available cleaner vehicles. Specifically Rush recommends that the TCEQ set aside a portion of the funding to be dedicated to school bus replacement projects.

We believe that new, clean diesel and alternative fuel school buses, offer a cost-effective strategy to reduce NOx emissions and improve public health. Rush would like to support your efforts to deploy these funds through the assistance of our extensive network of dealerships. Using these funds to deploy new, cleaner on-road trucks and buses will generate economic stimulus in the state of Texas by stimulating truck and bus manufacturing and sales, and will also create demand for fuels produced within the state such as diesel, natural gas and propane. For these reasons, we have provided some background information and data to support our recommended additions to the draft plan, below. We respectfully request TCEQ consider the following modifications:

1. **Consider $75M Set-Asides for a Clean School Bus Program**
   
   The school districts across the State have the challenge of an aging school bus fleet and limited availability of funds to replace old buses with new, cleaner options. By creating a carve out of funds for school buses, the TCEQ will accelerate fleet turnover and encourage adoption of safer advanced technology buses across Texas, thereby multiplying the positive effect well beyond the emission reductions.

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Based on experience participating in numerous school bus funding programs across the country, we have seen a trend of school districts choosing clean diesel over alternative fuels in a program structured as first come, first served and without greater incentives for alternatives to diesel. The latest round of TERP Clean School Bus funding reinforces this fact: ninety-five percent of funding went to clean diesel school buses.

For these reasons, we encourage TCEQ to set-aside at least $75M for a Clean School Bus Program, similar to the current TCEQ program. However, the program would have a specific $35M alternative fuel focused sub-program and would be limited to fuel sources that are alternatives to diesel and gasoline.

These cleaner buses will significantly reduce our student’s exposure to emissions that are associated with pre-2007 diesel buses, including increased asthma emergencies, bronchitis, and school absenteeism, especially among asthmatic children. Clean school buses effectively eliminate diesel particulate matter emissions that are associated with cancer and thousands of premature deaths nationwide every year.

2. Vehicle grants should be awarded based on NOx emissions reduced per grant dollar awarded as determined by the AFLEET model

Texas needs to use the EMT funds to reduce as much NOx as possible in the shortest amount of time. In order to maximize the effectiveness of the EMT funds, grant applications should be evaluated and awarded based on NOx reductions achieved per grant dollar awarded. The AFLEET model developed by the Argonne National Laboratory serves as the most up-to-date and comprehensive emissions calculator available. It takes into consideration not only reductions from engines certified to low-NOx and near-zero standards, but also incorporates the latest emissions data on those engines certified to the current federal standard.

Thank you for the opportunity to submit comments on this truly unique and exciting opportunity. Rush looks forward to continued engagement as this process progresses and partnering with the TCEQ to ensure successful program deployment!

Sincerely,

Robert Holt
General Manager
Rush Bus Centers

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