



April 26, 2018

Clerk of the Board  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95814

## **SENT VIA ELECTRONIC SUBMISSION**

RE: Item 18-3-1; AB 617 Community Air Protection Funds Supplement to Carl Moyer

California Air Resources Board,

Thank you for the opportunity to submit comments on the proposed Community Air Protection Funds supplement to the Carl Moyer Memorial Air Quality Standards Attainment Program. Motiv Power Systems (Motiv) was founded in 2009, and is headquartered in the San Francisco Bay Area. Motiv is committed to freeing fleets from their dependence on fossil fuels. Motiv's Electric Powered Intelligent Chassis (EPIC) is available for a number of different body configurations including, school buses, walk-in vans, box trucks, work trucks, shuttle buses, trolleys, and other specialty vehicles. A Motiv zero-emissions EPIC chassis offers uncompromised performance and functionality without the pollution, noise, heat, and vibration of combustion power.

This is an exciting time in California to advance the health outcomes and climate change goals associated with the transportation sector. There is more money and emphasis in California than ever before to shift our current reliance on diesel, gasoline, and fossil fuels in the transportation sector including- Governor Brown's executive order (B-48-18) calling for 5-million ZEVs in California by 2030, greater investments in the highly effective Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), soon to be implemented Volkswagen settlement dollars, increased funding caps for Moyer School Bus projects and many other examples.

### **Comments on the Proposals**

*Proposal: Eliminate state funding caps and increase the maximum percentages of eligible cost with Community Air Protection funds*

**Motiv supports** the proposal to eliminate state funding caps and increase the maximum percentages of eligible cost with Community Air Protection funds.

*Proposal: Extend school bus project eligibility to private school bus fleets servicing public schools*

**Motiv supports** the proposal to extend school bus project eligibility to private school bus fleets servicing public schools. Many California school districts do not have the bandwidth or have simply chosen to contract with a private fleet to transport their students to and from school related activities for a variety of reasons. Ensuring the most vulnerable individuals among us,

children, are protected from highly polluting diesel engines should be a top priority. That top priority should be addressed regardless of how a child's school district has chosen to operate its transportation services.

*Proposal: Allow average school bus fleet usage to be used when determining potential grant amounts*

**Motiv supports** the proposal to allow average school bus fleet usage to be used when determining potential grant amounts. A key component to the Moyer program in determining the actual funding amount for a vehicle is the "cost-effectiveness" limit. While Motiv recognizes this is a statutorily required component and therefore cannot be eliminated—however as Motiv has worked with school districts on Moyer applications it is apparent that the highest polluting vehicles tend to have the lowest VMTs and thus the potential grant amount does not create a large enough incentive to actually remove these vehicles from the fleet. Allowing an average of the total fleet to be used for potential grant amounts will help ensure these vehicles are actually removed from service eliminating the health and climate change concerns associated with these vehicles.

*Proposal: Ensure that applicants from other oversubscribed school bus incentive programs are eligible for Community Air Protection funds wherever feasible*

**Motiv supports** any way to provide flexibility in the use of Community Air Protection funds to advance the AB 617 goals as well as Moyer program goals within the current program parameters is welcome. When demand for programs are greater than supply, such as in the Rural School Bus Pilot project, being able to tap into other resources to supplement the outstripped program can help bring the benefits of that program to more communities while remaining compliant with the parameters of all allocated funds.

#### *General Comments*

The increase in the school bus funding cap in Moyer has been a game changer when it comes to districts actually pursuing Moyer funds to remove their highest polluting buses. However, as Motiv has worked with school districts in pursuing Moyer funds the administrative burden still remains a hefty barrier to many resource restrained districts and their partners. Motiv urges the Board to always push the Moyer program, administered by the air districts, to stream line and increase efficiency while maintaining the cost-effectiveness and other statutory components.

Thank you again for the opportunity to comment on Item 18-3-1, and if you have any questions please contact me.

Cheers,

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