

December 27, 2021

Dear Oregon Department of Environmental Quality (DEQ) and NESCAUM Staff,

My name is Victoria Paykar and I am the Oregon Transportation Policy Manager at Climate Solutions. Thank you for the opportunity to provide feedback on the preliminary draft of the MHD ZEV Action Plan. The strategies and recommendations section of the Action Plan is very comprehensive and provides a robust amount of opportunities that state agencies can implement at home. In particular, we were pleased to see recommendations regarding bold actions needed to address environmental justice disparities, battery sustainability, workforce development opportunities, continuation of diesel regulation for existing diesel engines on the road, and more.

With that said there are a few comments that we would like to provide for your consideration:

- MHD ZEV programs should not only prioritize incentives for fleets that are located in yards in and around disproportionately polluted communities but also electrification equipment
- Oregon is in a unique position with Daimler Trucks North America's headquarters located in Portland and the opening of the [Nation's first public MHD charging site on Swan Island](#). Other MOU states may also have similar opportunities to connect with private manufacturers and so it may be helpful to include best practices and lessons learned for state agencies interested in building programs like Volvo Lights in their states.
- While MOU states individually might not be able to change the course of battery supply chain practices, MHD ZEV MOU states as a collective have a higher chance of creating battery supply chain change. That being said, the Action Plan should encourage MOU states to collectively take a firm stance in requiring improvements for battery supply chain and cradle to grave best practices.
- While fleet purchase requirements are important to speed the transition to ZEV MHDs, many states still do not have incentives for purchasing MHD ZEVs. It would be helpful to list out the ways in which state agencies can secure funding for MHD ZEV incentives or even the creation of a national fund that states can utilize.
- In the process of ensuring our transition to MHD ZEVs, we also need ambitious federal and state policies that address legacy diesel engines (both on road and off road) to reduce diesel pollution that disproportionately affect low-income and BIPOC communities. It would be helpful to include potential policies that states can seek to implement to reduce diesel emissions from legacy on road and off road vehicles/equipment.

Thank you for the opportunity to provide comments.

Sincerely,

Victoria Paykar  
Oregon Transportation Policy Manager  
Climate Solutions