



December 23, 2016

Ms. Carolyn Watkins
Ohio Environmental Protection Agency
Office of Environmental Education
P.O. Box 1049
Columbus, Ohio 43216-1049

Subject: Comments on Ohio's VW Mitigation Plan

Dear Ms. Watkins:

The Mid-Ohio Regional Planning Commission (MORPC), City of Columbus, Central Ohio Transit Authority, and Columbus Regional Airport Authority regularly work together on issues that impact our air quality and advance the transportation system in Central Ohio and beyond. This letter is our coordinated regional stakeholder response to the Ohio EPA's invitation to submit informal comments regarding the state's mitigation plan as a result of the Volkswagen settlement.

Based on what we know about the VW settlement and what Ohio can expect in the coming years, we offer the following comments in the areas of: (1) the Ohio EPA's proposed map; (2) to what uses the funding should be allocated; and (3) the percentage of time fleets should operate in the priority counties in order to be eligible for the grand funds.

1 – Proposed Map, Including Five Counties in Central Ohio Region

We support the inclusion of the Central Ohio region as a first priority for the VW settlement, as already identified by the map created by Ohio EPA.

This region has a wide variety of support – including all the partners in this letter – as it relates to addressing our challenges to maintaining good air quality. We are actively engaged with a broad group of stakeholders including local government leaders, environmental advocates, public health agencies, business groups and others to promote strategies to improve air quality and mitigate traffic congestion. Since 2000, MORPC has operated an air quality forecasting program for ozone and fine particle pollution, and it alerts the public when pollution levels are forecasted to be unhealthy for sensitive groups of people.

- NO_x is a precursor to harmful ozone pollution that can trigger a variety of health problems, particularly for children, the elderly, and people of all ages who have respiratory conditions such as asthma.
- NO_x is an exacerbating factor in both asthma and COPD, both of which are prevalent health concerns in Franklin County. In fact, Franklin County's child asthma rate is higher than the

state of Ohio, and the state of Ohio's rate of child asthma is higher than that of the national rate of child asthma.

2 – Allowable Uses

We are supportive of all ten eligible categories of mitigation actions being included in Ohio's plan. We favor a balanced approach and highlight the following areas as of great benefit to our region:

Electric Vehicle Infrastructure: While our region's air quality and rates of respiratory disease demonstrate need for NOx mitigation, our region is currently forging ahead with renewable infrastructure projects, many of which are "shovel-ready."

Under the Smart Columbus initiative, Columbus will become the nation's epicenter for intelligent transportation systems (ITS) research to improve safety, enhance mobility, address climate change, and bring ladders of opportunity to those who have been left behind in the past. Columbus was also awarded a grant from Paul G. Allen's Vulcan Inc. to accelerate the transition to an electrified low-emissions transportation system. This includes adoption of electric vehicles and building related charging infrastructure. Thus the settlement funds would be leveraged with existing investment in cleaner infrastructure for a multiplier effect towards improved air quality.

Proposed awards should not be limited so as not to provide a disincentive to "shovel-ready" projects. Proposed projects should indicate some metrics as to numbers of electric vehicles that could be served or numbers of charging stations.

Transit: Bus improvements could have a significant impact on the number of engines repowered or replaced, as well as the total reduction in emissions. With the continuous, frequent use of buses to provide a direct service to so many members of the public, great emphasis should be placed in this area in order to experience lower emissions and increased health benefits.

The Central Ohio Transit Authority is transitioning its bus fleet from diesel to natural gas. This transition and the development and construction of supporting fueling stations that will be open to the public will provide the infrastructure supporting the shift and growing interest of private companies to convert their vehicles to natural gas. Funding natural gas buses and leveraging additional transit dollars to develop and build public natural gas fueling stations is an appropriate use of the VW Settlement funds.

Airports: Emission reductions related to airports will also be an important component of Ohio's plan. This includes clean alternative fuels and electrification for fleets of parking lot shuttles, airport ramp equipment, airport maintenance vehicles, and stationary electric generators. The Columbus Regional Airport Authority owns and operates three airports within Franklin County, with an annual economic impact of \$4.7 billion and employment of over 38,000. Operating the airports' fleets and facilities in a sustainable manner provides benefit to Central Ohio's community, environment, and economy.

3 – Percentage of Time Fleets Should Operate Within Priority Counties to be Eligible for Grant Funds

With respect to determining how funding eligibility of fleets should be assessed, some clarification may be needed on the definition of "time spent in the region." Is it referring to "travel" time only? **We would like to recommend approaching this based on "percentage of mileage fleets should travel**

within the region” instead of “percentage of time fleets should spend in the region," because it may not be easy for applicants to collect fleet travel time data.

To maximize the environmental benefits of repowering or retrofiting fleets, we suggest setting up a minimum percentage (say, 70 percent) of total fleet miles travelled within the priority area to be eligible for mitigation trust funds.

We recommend against using time spent because of the type of data that would need to be collected to make this determination, and the unlikelihood that most applicants do not collect data by time spent within a priority area. Instead, the applicant could be requested to provide data to demonstrate that a minimum amount of route miles or total fleet miles travelled are within the priority area. An exception to this would be ground support equipment and vehicles that may not have any means to measure mileage (i.e. are stationary for part or all of their operation) at airports. Although in the case of the Columbus Regional Airport Authority, these stay in the county and thus would be in the region 100 percent of the time.

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Thank you for the opportunity to comment on Ohio’s VW mitigation plan. We look forward to continuing our efforts with the U.S. EPA, Ohio EPA, our local governments, and other stakeholders in Central Ohio to improve the quality of our air.

Sincerely,



William Murdock
Executive Director
Mid-Ohio Regional
Planning Commission



Andrew J. Ginther
Mayor
City of Columbus



W. Curtis Stitt
President & CEO
Central Ohio
Transit Authority



Elaine Roberts, A.A.E
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