



King County

Department of Transportation

Harold S. Taniguchi, *Director*
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December 19, 2017

Mr. Brett Rude
Air Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: King County's Comments on Department of Ecology's Draft Volkswagen Mitigation Plan

Dear Mr. Rude:

King County appreciates Washington State Department of Ecology's (Ecology) principled proposal to mitigate harmful Nitrogen oxide (NOx) emissions in our state, especially the focus on improving air quality in communities with disproportionately high levels of air pollution. We thank Ecology for their outreach efforts and continued engagement with King County as well. This letter is a follow up to our August 15, 2017, letter which outlined King County interests and recommended principles and priorities for investment of the Volkswagen (VW) settlement funds.

The Draft Mitigation Plan takes into consideration many of the core priorities shared by King County government in our August 15, 2017, letter and the cities within our borders most impacted by VW's fraudulent actions. We further appreciate Ecology's recognition of the need for funding for on-road heavy duty vehicles—like buses and trucks—electric vehicle charging equipment, and Diesel Emission Reduction Act (DERA) projects.

We appreciate the principled approach to funding allocations to focus investments where they will have the most benefit in reducing NOx emissions in communities most impacted by this pollution. To achieve these outcomes, we request that Ecology further align funding allocation percentages to NOx sources and regions most impacted. A greater emphasis on funding for on-road vehicles relative to proposed investment in ferry electrification would ensure NOx reduction benefits occur in all affected regions.

We understand that public ferries represent a significant emissions problem; King County supports the electrification of the state and local ferry system. However, due to the distribution of ferries throughout Puget Sound and prevailing winds, not all communities with significant emissions burdens will experience necessary reductions. Specifically, if ferry emissions are emphasized as proposed, highly impacted census tracts shown in Figure 3 of the Draft Mitigation Plan—such as communities in South King, Pierce, and Kitsap Counties, and cities and communities inland from coastal regions—may experience less benefit. In these areas, the largest source of harmful NOx emissions and greatest reduction opportunity is on-road, heavy duty

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vehicles. In order to better meet Ecology's goal, King County recommends Ecology adjust the funding allocations to lower the percentage for marine vessels to no more than 25 percent of total spending, and at least 45 percent of funding for on-road heavy duty vehicles.

We thank Ecology for its leadership in considering a principled approach to reduce NOx and other harmful air pollutants by funding the most critical project types in all regions that have the greatest need. King County remains committed to working with Ecology to improve air quality, human health and wellbeing, and our natural environment. Thank you for your consideration of our recommendations.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

cc: Mike Boyer, Washington State Department of Ecology
Megan Smith, Director of Climate and Energy Initiatives, King County Executive Office
(KCEO)
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