



King County

Dow Constantine

King County Executive

401 Fifth Avenue, Suite 800
Seattle, WA 98104

206-296-9600 Fax 206-296-0194

TTY Relay: 711

www.kingcounty.gov

August 15, 2017

Maia Bellon

Director

Washington State Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

RE: King County's Recommended Investment Principles for the Volkswagen Mitigation Settlement

Dear Ms. Bellon:

We appreciate the Department of Ecology's efforts to survey statewide stakeholder opinions on how Volkswagen mitigation funds should be invested in Washington. We completed Ecology's survey, but would like to provide additional feedback on the types of projects and the regions within King County that have the greatest need for funding to mitigate nitrogen oxide (NOx) emissions, maximize air quality benefits, and improve human health. Overall, we support guiding principles developed by the Puget Sound Clean Air Agency (PSCAA) in consultation with King County and other stakeholders that focus on achieving the best outcomes for reducing NOx and diesel particulate matter (DPM) emissions in the communities most impacted.

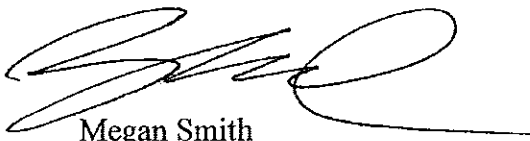
Funding Principles: The Volkswagen mitigation fund represents a significant opportunity to achieve substantial reductions in pollution in our state and mitigate the harms caused by Volkswagen's actions. We recommend project funding address the following principles:

- Prioritize NOx exposure (and DPM exposure) reductions to benefit areas that have historically borne a disproportionate share of the NOx exposure burden within a jurisdiction.
- Focus funding on projects that achieved the "most-NOx-exposure-reduction per dollar" while also addressing DPM emissions.
- For innovative, unproven technologies, limit funding to projects that don't duplicate other activities in other states and that are replicable.

- **Light duty zero emission vehicle supply equipment:** Funding to cover costs associated with purchase and installation of electric vehicle charging stations located in public places, workplaces, or multi-unit dwellings, to support electric vehicle deployment, including to lower-income and community housing, and transportation-oriented developments throughout King County.
- **Matching funds for projects eligible under the Diesel Emission Reduction Act (DERA):** Provide matching funds to cover the full incremental cost required to replace vehicles eligible for funding under the DERA funding opportunity. Projects include replacement of auxiliary generators, diesel-powered waste compactors, and other large diesel engines operating in regions where NOx emissions are disproportionately high.

King County has a long-term commitment to improve the health and wellbeing of people and the natural environment in our state. We thank the Department of Ecology for its leadership identifying suitable projects and for considering a principled approach to reduce NOx and other harmful air pollutants. We are ready to work with the Department of Ecology and other Washington State partners to ensure this unique funding opportunity makes a lasting positive impact on our region, in the areas that need NOx mitigation most.

Sincerely,



Megan Smith
Director of Climate and Energy Initiatives
Office of King County Executive Dow Constantine

cc: Brett Rude, Department of Ecology
Mike Boyer, Department of Ecology
Craig Kenworthy, Executive Director, PSCAA
Andrew Green, Air Quality Programs Division Director, PSCAA
April Putney, King County Legislative Relations Manager,
Christie True, Director, King County Department of Natural Resources and Parks
Harold Taniguchi, Director, King County Department of Transportation
Peter Heffernan, Government Relations, King County Department of Transportation
Patty Hayes, Director, Public Health Seattle and King County
Ngozi Oleru, Director, KC Environmental Health Services, Public Health Seattle and King County