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DEC 22 2017

Dept. of Ecology

TACOMA PUBLIC UTILITIES

December 19, 2017

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

Dear Mr. Rude and Mr. Boyer,

Tacoma Power welcomes this opportunity to comment on the Department of Ecology's Proposed Volkswagen Beneficiary Mitigation Plan.

Tacoma Power is a municipal public utility that continues to provide clean, reliable, affordable hydropower to our customers in Tacoma and surrounding communities, and has done so for more than 100 years. Our commitment to environmental stewardship aligns with the Draft Mitigation Plan principles and we recognize the distribution of funds under this plan as an opportunity to improve the health of the communities we serve.

Our service territory is bisected by Interstate 5 and includes the Port of Tacoma and significant railway traffic, three of the greatest sources of nitrous oxides in the state. Tacoma Power also serves many communities described as low income households, communities of color, and minority populations located near industrial facilities, ports, and high traffic or freight corridors that experience high concentrations of nitrous oxides. We hope to better the livability of our communities through participation in this process.

Tacoma Power would like additional clarification on the following topics.

1. The Volkswagen emission scandal affected vehicles that were built from 2008-2015. Table 1 of the Draft Plan identifies 9% of affected vehicles were registered in Pierce County. This is significant because page 2 of the Draft Mitigation Plan suggests the funding may be allocated to "where the Volkswagen vehicles were, are, or will be operated..." This approach may unfairly bias the allocation of mitigation funds away from lower income communities where residents are more likely to own older, used vehicles.

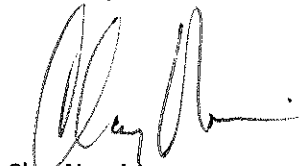
We would encourage the Department of Ecology to increase the allocation of funds for Pierce County to correct for bias from income disparities and a lack of available credit that may have prevented greater ownership of affected vehicles.

2. Please describe how the Department of Ecology plans to "maximize air quality co-benefits beyond nitrogen oxide reductions". Will the Department of Ecology also track the effect of mitigation proposals on other harmful emissions, including carbon dioxide?

3. The draft plan identifies on page 13 that it will prioritize projects that will “accelerate the adoption of electric vehicles, equipment, and vessels”. Please describe how the Department of Ecology will coordinate the funding of projects with those from other sources, including investments from Electrify America which also gets funding from the VW Settlement.
4. Light-duty Zero Emission Vehicle Supply Equipment - The Draft Plan correctly identifies that the benefits of electric vehicles are dramatically increased when the source of the power comes from zero-carbon generation resources. We encourage the Department of Ecology to take the source of the power as a factor when considering the distribution of funds for electric vehicle supply equipment.
5. One of the priorities listed is “ensure cost effectiveness” (p 13). Will cost effectiveness be evaluated as \$/ton NOx reduced, \$/ton CO2 reduced, or by some other metric?
6. Appendix A, part 5 discusses Ocean Going Vessels (OGV) Shore Power. It lists components that are eligible for reimbursement. Does this include the engineering, and construction required to install these systems?
7. We are pleased to see that Ocean Going Vessels are a significant portion (up to 45%) of funding because we think this will have a significant impact on our most historically affected communities. Another source of air emissions at the Port is due to the expanded use of refrigerated containers. Thousands of refrigerated containers use diesel generators for power. Preliminary analysis suggests that power service extension for cold-ironing could also provide an added benefit of replacing many diesel generators at the Port of Tacoma with hydropower. This is not included in the Draft Mitigation Plan. We recommend this be added to the list of “Marine Vessels and Switch Locomotives”.
8. Public engagement has not been significant enough to include as a means to distribute funding. Please consider expanding the number of survey participants before considering using survey results to allocate funding.
9. To ensure a consistent approach and avoid further disconnection, we suggest that the proposed funding allocations on Table 2 be aligned with the Eligible Project Categories in Appendix A.

We appreciate this opportunity to request clarification and share our comments and look forward to working together to improve the environment for the benefit of the people of Washington State.

Sincerely,



Clay Norris  
Power Manager, Tacoma Power