

Summary of Public Responses to the Draft Spending Plan (Round 2)

NGVAmerica

Natural gas vehicles (both CNG & LNG) are the most cost effective and offer the best solution to achieve the goals of the Plan. NGV doesn't understand why we would spend the funds on electric transit buses when our tables show that CNG is more cost effective. They also mention that natural gas locomotives will outperform diesel locomotives on emission reductions.

They think we should model our plan after Colorado's. CO did not pick a specific alternative fuel/vehicle type and left the funding open for all alternative fuel types. They're using 40% of funds for gov't and 25% for private.

NGV thinks we should provide a larger incentive and more funding for medium and heavy duty engines that deliver greater NOx reductions than currently required for new vehicles and engines.

DOEE should also consider scrapping materials.

- Increase the options for scrapping beyond a strict replacement of a current fleet vehicle (e.g., allow a fleet to acquire an older vehicle from another fleet or allow a fleet to exchange one of its newer vehicles for another fleet's older vehicle that is then scrapped)
- Since the Trust does not specify the fuel of the scrapping vehicle, allow natural gas vehicles that meet the year criteria to be scrapped and replaced with new NGVs

DOEE should use the most current AFLEET Tool: Heavy Duty Vehicle Emissions Calculation Tool (HDVEC). New AFLEET calculator, more user-friendly. NGVAmerica also mentions that the DEQ Tool does not have current assumptions and data for today's engines and in-use emissions

Others:

- Target funding for technologies that have demonstrated the ability to deliver actual lower in-use emissions when operated in real-world conditions
- Provide the highest level of funding to applications that produce the largest share of NOx emissions (in most regions this means prioritizing for short-haul, regional-haul and refuse trucks)
- Prioritize funding for commercially available products that are ready for use
- Prioritize funding for clean vehicles rather than fueling infrastructure
- Scale funding to incentivize the cleanest engines available – at a minimum, provide parity among alternative fuels by following a version of the Colorado VW Plan that funds non-diesel alternative vehicles in the private sector at 25% of the cost of the vehicle and public sector vehicles at 40%
- Ensure that funding incentivizes adoption by both public and private fleets
- Prioritize projects that include partnerships that provide a match such as a CNG or LNG station being built in locations that will receive the VW funding
- Accelerate the funding in the early years to maximize the NOx reduction benefits

BYD

BYD supports the District's goal to prioritize adoption of zero-emission and alternative fuel vehicles to achieve greatest NOx reduction. They also think the District should consider putting more emphasis on its goal of a zero emission transportation sector. BYD says that achieving the most NOx reduction but failing to create the incentive towards a cleaner vehicle future will not reach the zero emission goal it's trying to achieve.

BYD also supports the District's consideration of emission co-benefits.

They support the DEAL program but think we should prioritize projects that have electrification options.

They recommend the District to establish a "competitive, inclusive, and transparent" project selection process and think we should treat it more as a voucher program.

They talk about their products-Class 6 and 8 electric refuse trucks and seven different bus models with onboard charging.

They're requesting an in-person meeting.

Entertainment Cruises

They think DOEE should include off-road marine engines for the DERA option or DEAL program. The Odyssey III and the Spirit of Washington operate through Ward 8 multiple times a day.

They provide emission benefit info compared to the other projects presented in the Plan. Engine replacement of the marine vessels will result in 10-15 times more NOx reduction, ~27 times more PM reduction, and 9-30 times more CO2 reduction than an electric transit bus.

Ford

Recommends DOEE use the full 15% of funds toward EV charging on workplaces and highway corridors. They also suggest that DOEE should consider policy options that will result in the deployment of EV chargers.

MedicAire, LLC

Interested in using the funds towards the deployment of Medidock, which is an idle reduction control technology for ambulance/emergency vehicles. Most of idling of ambulances occurs outside of medical facilities and are thus impacting vulnerable populations. Medidock can be used on any ambulance without any additional installment.

This project could be funded through the DERA option.

Pat Bahn

Pat suggests anti-idling efforts at the RFK lots for diesel buses and thinks DOEE should work with DDOT and EventsDC to set up trailers with couches and entertainment for the drivers instead of having them sit in their trucks and idle. Will reduce unnecessary idling and improve safety for the drivers.

Pat also suggests investing in 220V plugs at the RFK lots in the winter to plug the vehicles in for block heaters to reduce pollution from restart and keep the drivers warm.

Pat also recommends DOEE spend the money on public EV charging stations.

TransTec – Kelly Trippe

High-molecular-weight polyisobutylene (HMWPIB) technology can be used to reduce emissions from diesel engines. TransTec is interested in a pilot program for the transit bus, locomotive, or refuse truck.

GWRCCC

GWRCCC supports the switcher locomotive replacement project but thinks DOEE should upgrade the engines to a Tier 5 engine, which is currently being piloted in California. GWRCCC claims that the extra emissions from the new upgraded Tier 4 engine will continue to pollute the area over the next 30+ years. The cleaner technology is likely to become available within the timeframe of the upgrading the switchers. DOEE should remain flexible with the technology that will be eventually chosen for the project, especially since it will be in-use for an extended period of time.

GWRCCC is also a supporter of ZEV infrastructure development in the District. They think buying CNG transit buses and refuse trucks would be the most cost-effective.

They also think we should strongly consider renewable natural gas. Washington Gas has already agreed to considerable funding.

Last but not least, GWRCCC also supports the 9% administrative costs and would like DOEE to consider outsourcing work to GWRCCC for program outreach and project management activities.

Nordco

Amtrak should deploy electric Shuttlewagons.

Black & Veatch

Interested in partnering with the District for ZEV infrastructure development.

Hal Connolly

The District should spend funds toward light-duty EV charging infrastructure, preferably through at-home parking or street lights.

Sierra Club

The District needs to spend funds toward all-electric ZEVs, preferably transit buses. Sierra Club submitted a form with 122 signatures supporting the deployment of electric transit buses over alternative/diesel transit buses.

WGL Energy and Washington Gas

The District should spend funds toward CNG or RNG vehicles.

Proterra

Proterra strongly supports the DEAL program. They suggest we limit the DEAL program to all-electric vehicles and not “near-zero”.

DDOT

The DEAL program should focus more on how much the vehicles will primarily serve residents of Wards 5, 7, and/or 8 as opposed to how often they’re in those locations. Funding recipients should provide annual reports with estimates of ridership on DEAL buses in Wards 5, 7, and/or 8.

DDOT suggests shortening the timeframe for reporting data. They suggest a consistent annual reporting period of 5 years for both the asthma events and vehicle usage. Also, shortening it to 5 years, instead of 8, will reduce the administrative burden on DOEE and the funding recipients.

DDOT also suggests we drop the two tiered funding approach. The funding recipients who meet the conditions of serving residents in Wards 5, 7, and/or 8 should be awarded \$425,000.

DOEE should not consider giving any credit towards the VW settlement funds since this was a consequence of horrid behavior.

Buzzard Point

DOEE’s Environmental Justice Assessment does not account for sufficient factors in determining which areas most need pollution control. Buzzard Point is part of Ward 6, which DOEE is not considering as an EJ Ward. The neighborhood has increased poverty rates, high traffic volume, and construction

development and industrial facilities that create particle pollution (cement and aggregate facilities and two former Pepco Substations).

DOEE should also make a greater effort in the public engagement process.

The Draft does not indicate any funding toward insurance or hiring a third party for assistance with the Trust, despite the 9% administrative costs allocated to DOEE. The Draft should be more transparent about what the administrative costs include.

The Draft should be revised and resubmitted for public comment.