



Mid-Ohio Regional
Planning Commission

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Ohio EPA, Office of Environmental Education
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P.O. Box 1049
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Subject: Alternative Fuel Vehicle Conversion Grant Program

To whom it may concern:

This letter represents the comments submitted by the Mid-Ohio Regional Planning Commission (MORPC) on the alternative fuel vehicle (AFV) conversion grant program, as authorized by the legislation passed by the Ohio General Assembly in 2016. MORPC supports the development of such a program, as promoting alternative fuels is key to the economic success and public health of our region.

Maximizing emissions reductions is paramount, and MORPC commends a grant program that will reduce emissions by purchasing new class 7 or 8 large trucks that run on compressed natural gas, liquid natural gas or liquid petroleum gas, or the conversion of one or more traditional fuel vehicles into alternative fuel vehicles. Turning over fleets to cleaner burning fuels, or converting fleets to run on cleaner burning fuels will necessarily reduce emissions in the regions where those fleets operate.

Because of the timeframe, MORPC recommends maximizing flexibility for applicants in order to utilize all the available funding through June 30, 2017. However, MORPC also recommends a stronger preference towards applicants with fleets operating in non-attainment or priority areas in the State of Ohio for criteria pollutants, which are most harmful to human health. In showing preference to fleets in these areas, Ohio EPA will ensure our region is better positioned to meet National Ambient Air Quality Standards (NAAQS), which are based on extensive health science on air pollution effects. This method would incentivize projects that will positively impact areas in greater need of emissions reductions through a continued voluntary approach along with areas in which residents may be most threatened by exposure to harmful air pollution.

MORPC provides these comments as part of its expertise on air quality in the 15-county region of Central Ohio. Our more than 60 local government members recognize the importance of clean air and how it impacts the quality of life and economic vitality in the region. MORPC produces year-round daily air

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quality forecasting for ozone and particle pollution and issues Air Quality Alerts when pollution is expected to exceed levels that are safe for sensitive groups of people such as children, the elderly, those with respiratory diseases like asthma, and outdoor workers.

Exposure to air pollution can irritate the throat and lungs, making it more difficult to breathe. The Centers for Disease Control and Prevention report that more than 242,000 people in Central Ohio have been diagnosed with asthma. In the Central Ohio region, the pollutants that pose the biggest threat to human health are ground-level ozone and particle pollution. The greatest contributor to ozone pollution in the Central Ohio region is emissions from cars and trucks. Conversion of fleets to alternative fuels would decrease these emissions, and have a measurable impact on the health of our region's most vulnerable residents.

Further, MORPC has experience with clean fuels efforts and specifically clean fuels grants administration in the region. For example, in 2005, MORPC spearheaded the Mid-Ohio Diesel Project identifying voluntary programs to reduce diesel exhaust pollution from in-use, heavy-duty trucks, buses, trains, and construction equipment. Study stakeholders included U.S. EPA, Caterpillar, Inc., Ohio EPA, Ohio Environmental Council, and MORPC. Stakeholders identified funding as one of the barriers to implementing clean diesel programs and resulted in efforts that established the Diesel Emission Reduction Act (DERA) funding program.

As a result, MORPC facilitated approximately \$1.7 million in DERA grants in 2009 and 2011 for 16 diesel fleets including school buses, road construction, and long-haul freight trucks. In total, MORPC improved the emission performance of 281 in-use diesel engines, and installed 310 units of technology, which resulted in lifetime reductions of 675 tons and 18 tons of NOx and PM2.5, respectively, per MORPC's final grant report to U.S. EPA.

Our region is poised to grow significantly by 2050 with the addition of nearly one million more people and must be positioned for this continued growth while also safeguarding the health of Central Ohioans. This grant program can be a valuable tool in preparing our region for the future and protecting public health.

Kind regards,



William Murdock
Executive Director
Mid-Ohio Regional Planning Commission