

**From:** [no-reply@caspio.com](mailto:no-reply@caspio.com)  
**To:** [DENR-INTERNET INFORMATION](#); [Regynski, Barb](#)  
**Subject:** [EXT] Comments concerning revisions to South Dakota's Volkswagen Beneficiary Mitigation Plan  
**Date:** Tuesday, March 30, 2021 2:35:26 PM  
**Attachments:** [Comments.docx](#)

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## VW Mitigation Plan Revision Comment

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**Date Comment Filed:**

03/30/2021 14:34:19

**Commenter Info:**

Robert Moffitt

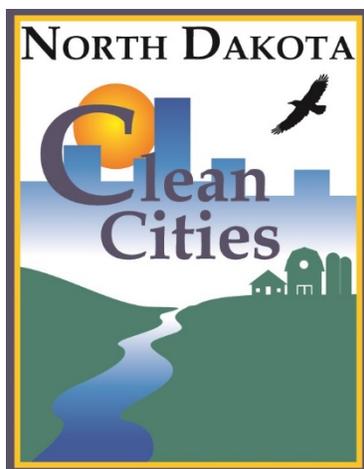
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**Comments :**

I am commenting as coordinator of North Dakota Clean Cities (NDCC), a nonprofit program that supports the use of alternative fuels in North Dakota. When North Dakota was seeking comments on its Volkswagen Beneficiary Mitigation Plan, NDCC recommended the state dedicate the maximum 15% for electric vehicle charging equipment established by the Trust. The state followed our recommendation, and the results were the installation of 9 new DC fast chargers in North Dakota in 2020. Until this funding opportunity, the state had no fast chargers. Several of these are along I-29, if SD adds some along this highway, it will create a corridor for EV travel. I have attached a copy of some of our additional recommendations for North Dakota for your consideration. Thank you.



## Comments of draft mitigation plan

North Dakota Clean Cities, which is operated by the American Lung Association in North Dakota, offers the following comments on the draft mitigation plan for the Volkswagen Environmental Mitigation Trust Agreement. In general, we agree with the plan's proposal to reduce NOx emissions in North Dakota by replacing diesel engines with cleaner, alternative fuels. We recommend that in determining a ranking system to determine which proposals best meet the needs of the state and its residents, the Department of Health consider the following:

1. Proposals that offer the highest number of vehicles replaced, chargers installed, etc.
2. Proposals that demonstrate the ability to reduce not only NOx, but also other emissions such as particulates and greenhouse gases.
3. Proposals that have a direct or indirect positive effect on human health, such as improving air quality in worksite with heavy levels of diesel emissions present.
4. Proposals that help to diversify North Dakota's transportation fuel use, making the state a little less dependent on traditional petroleum fuels.
5. Proposals that combine public and private funding to maximize benefits to the environment and to human health.

North Dakota Clean Cities supports all alternatives that have been proven to be cleaner and/or more sustainable than traditional petroleum diesel. This includes biofuels, CNG, RNG, propane and electricity. We do have some feedback on each of these alternatives, and how they might be used to reduce NOx and other pollutants.

### Propane

North Dakota has two public locations that qualify as "primary stations" for propane transportation fuel (aka propane autogas), according to the U.S. Department of Energy. There are both located on I-94, in Bismarck and Jamestown. Projects that propose to replace diesel equipment with propane in these communities would already have an established fueling station built and ready.

### CNG & RNG

The trash and recycling industry has embraced compressed natural gas vehicles on a wide scale, but there are no known use of the fuel in North Dakota. Because the vehicles are readily available and natural gas vehicles are less noisy and polluting than their diesel equivalents, many cities prefer CNG trucks. North Dakota Clean Cities will contact several municipalities to gauge their interest in this fuel and the VW settlement funding.

### Electricity

North Dakota Clean Cities recommends that the ND Department of Health prioritize proposals that include DC fast charging stations located within 5 miles of Interstate highway 94 and Interstate highway 29. This would meet the goals of the North Dakota Department of Transportation to designate both as Alternative Fuel Corridors under the federal FAST Act. Qualifying projects may be eligible for additional funding from a US Department of Energy grant already awarded to the Gas Technology Institute, a NDCC partner. Adding DC fast charging on I-94 will link North Dakota to a series of similar chargers on I-94 in Minnesota, opening opportunities for EV tourism.

North Dakota Clean Cities offers its assistance to the Department of Health in the execution of this mitigation plan, as human and financial resources allow.

Submitted Aug. 31, 2018  
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