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In December, The Idaho Department of Environmental Quality released its draft mitigation plan detailing the criteria they expect to rely on to distribute the \$17.3 million available for reducing harmful NOx emissions. These dollars represent an uncommon opportunity to make significant and sustained progress in air quality. Getting this right is critical to the health and well-being of all Idahoans.

The NWGA is confident that a level playing field will demonstrate natural gas vehicles potential to be a superior technology for reducing NOx emissions, and improving air quality. The goals set forth in the IDEQ draft plan represent a reasoned and pragmatic step towards creating that level playing field.

Several surrounding states plan to use these funds to benefit individual technologies, which do not represent the most efficient methods of reducing NOx emissions. The current IDEQ mitigation plan appears to avoid these pitfalls, but several of the questions put forth for public input seem to consider the possibility of reserving portions of the fund for specific technologies or applicants. Any dollars that are reserved for specific technologies, that would not otherwise win in the proposed point-based system, represent a lost opportunity to remove as much harmful NOx as possible.

Specifically: reserving portions of this fund for light-duty ZEV technology leaves more harmful NOx emitting technology on the road, and duplicates the efforts of a separate VW mitigation fund that focuses on light-duty electric vehicles. This fund is designed to mitigate as much NOx as possible, which is critical for air quality and improving the health of Idahoans.

The current IDEQ mitigation plan is on the right path towards creating the merit based system necessary to take advantage of this fund, and the NWGA urges you to maintain this course of action.

Thank you for the opportunity to comment, and please feel free to reach out to creiten@nwga.org with any questions.