

**APPENDIX D-4**  
**Beneficiary Eligible Mitigation Action Certification**

## BENEFICIARY ELIGIBLE MITIGATION ACTION CERTIFICATION

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Beneficiary State of Iowa

Lead Agency Authorized to Act on Behalf of the Beneficiary Iowa Department of Transportation  
(Any authorized person with delegation of such authority to direct the Trustee delivered to the Trustee pursuant to a Delegation of Authority and Certificate of Incumbency)

|                                                           |                                                                                                                                       |
|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <b>Action Title:</b>                                      | Class 8 Local Freight Trucks and Port Drayage Trucks Funding Cycle 3                                                                  |
| <b>Beneficiary's Project ID:</b>                          | EMA 1 - FC3                                                                                                                           |
| <b>Funding Request No.</b>                                | (sequential) 13                                                                                                                       |
| <b>Request Type:<br/>(select one or more)</b>             | <input type="checkbox"/> Reimbursement <input checked="" type="checkbox"/> Advance<br><input type="checkbox"/> Other (specify): _____ |
| <b>Payment to be made to:<br/>(select one or more)</b>    | <input checked="" type="checkbox"/> Beneficiary<br><input type="checkbox"/> Other (specify): _____                                    |
| <b>Funding Request &amp;<br/>Direction (Attachment A)</b> | <input checked="" type="checkbox"/> Attached to this Certification<br><input type="checkbox"/> To be Provided Separately              |

### SUMMARY

|                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Eligible Mitigation Action</b> <input checked="" type="checkbox"/> Appendix D-2 item (specify): <u>Item 1</u><br><b>Action Type</b> <input type="checkbox"/> Item 10 - DERA Option (5.2.12) (specify and attach DERA Proposal): _____ |
| <b>Explanation of how funding request fits into Beneficiary's Mitigation Plan (5.2.1):</b><br>See Supplemental Information.                                                                                                              |
| <b>Detailed Description of Mitigation Action Item Including Community and Air Quality Benefits (5.2.2):</b><br>See Supplemental Information.                                                                                             |
| <b>Estimate of Anticipated NOx Reductions (5.2.3):</b><br>See Supplemental Information.                                                                                                                                                  |
| <b>Identification of Governmental Entity Responsible for Reviewing and Auditing Expenditures of Eligible Mitigation Action Funds to Ensure Compliance with Applicable Law (5.2.7.1):</b><br>See Supplemental Information.                |
| <b>Describe how the Beneficiary will make documentation publicly available (5.2.7.2).</b><br>See Supplemental Information.                                                                                                               |
| <b>Describe any cost share requirement to be placed on each NOx source proposed to be mitigated (5.2.8).</b><br>See Supplemental Information.                                                                                            |
| <b>Describe how the Beneficiary complied with subparagraph 4.2.8, related to notice to U.S. Government Agencies (5.2.9).</b><br>See Supplemental Information.                                                                            |

If applicable, describe how the mitigation action will mitigate the impacts of NO<sub>x</sub> emissions on communities that have historically borne a disproportionate share of the adverse impacts of such emissions (5.2.10).  
See Supplemental Information.

**ATTACHMENTS**  
(CHECK BOX IF ATTACHED)

- |                                     |                     |                                                                                                                                                                                                       |
|-------------------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <b>Attachment A</b> | <b>Funding Request and Direction.</b>                                                                                                                                                                 |
| <input checked="" type="checkbox"/> | <b>Attachment B</b> | <b>Eligible Mitigation Action Management Plan Including Detailed Budget and Implementation and Expenditures Timeline (5.2.4).</b>                                                                     |
| <input checked="" type="checkbox"/> | <b>Attachment C</b> | <b>Detailed Plan for Reporting on Eligible Mitigation Action Implementation (5.2.11).</b>                                                                                                             |
| <input checked="" type="checkbox"/> | <b>Attachment D</b> | <b>Detailed cost estimates from selected or potential vendors for each proposed expenditure exceeding \$25,000 (5.2.6). [Attach only if project involves vendor expenditures exceeding \$25,000.]</b> |
| <input type="checkbox"/>            | <b>Attachment E</b> | <b>DERA Option (5.2.12). [Attach only if using DERA option.]</b>                                                                                                                                      |
| <input type="checkbox"/>            | <b>Attachment F</b> | <b>Attachment specifying amount of requested funding to be debited against each beneficiary's allocation (5.2.13). [Attach only if this is a joint application involving multiple beneficiaries.]</b> |

**CERTIFICATIONS**

By submitting this application, the Lead Agency makes the following certifications:

1. This application is submitted on behalf of Beneficiary State of Iowa, and the person executing this certification has authority to make this certification on behalf of the Lead Agency and Beneficiary, pursuant to the Certification for Beneficiary Status filed with the Court.
2. Beneficiary requests and directs that the Trustee make the payments described in this application and Attachment A to this Form.
3. This application contains all information and certifications required by Paragraph 5.2 of the Trust Agreement, and the Trustee may rely on this application, Attachment A, and related certifications in making disbursements of trust funds for the aforementioned Project ID.
4. Any vendors were or will be selected in accordance with a jurisdiction's public contracting law as applicable. (5.2.5)
5. Beneficiary will maintain and make publicly available all documentation submitted in

support of this funding request and all records supporting all expenditures of eligible mitigation action funds subject to applicable laws governing the publication of confidential business information and personally identifiable information. (5.2.7.2)

DATED:

April 7, 2026



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Scott C. Marler  
Director

Iowa Department of Transportation

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[LEAD AGENCY]

for

State of Iowa

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[BENEFICIARY]

**Supplemental Information  
to the  
Appendix D-4 Beneficiary Eligible Mitigation Action Certification Summary**

**Appendix D-4 Summary**

**Eligible Mitigation Action Type:**

Appendix D-2 item: Item 1. Class 8 Local Freight Trucks and Port Drayage Trucks

**Explanation of how funding request fits into Beneficiary's Mitigation Plan (5.2.1):**

The Iowa Department of Transportation (DOT) and its working group clustered the 10 EMAs into five categories and established a target percentage of VW funds to be spent on each category. This funding request fits into Category 2, Class 4-8 local Freight & Class 8 Drayage Trucks. Iowa's BMP targeted a total of \$3,150,000 toward this EMA over three funding cycles. This third funding cycle targeted \$1,050,000, but only reimbursed \$657,105.60.

**Detailed Description of Mitigation Action Item Including Community and Air Quality Benefits (5.2.2):**

This third funding cycle for Iowa's Category 2, Class 4-8 local Freight & Class 8 Drayage Trucks projects will permanently take away 20 1992-2009 engine model year class 8 local freight trucks. They will be replaced with 19 new diesel trucks and 1 alternate fuel truck.

Replacing these trucks should reduce contact to high concentrations of NO<sub>x</sub> among the drivers but also reduce air pollution exposure among vulnerable populations across the state. All projects were scored competitively on community and air quality factors such as: achieving significant, quantifiable reductions on NO<sub>x</sub> emissions; counties with higher mobile NO<sub>x</sub> measurements; counties with a higher share of previously registered, non-compliant VW subject vehicles; areas of concern for vulnerable populations below poverty level, age, and race; counties with higher rates of asthma and heart disease hospitalizations; and counties with a higher share of point source NO<sub>x</sub> emissions.

Estimated lifetime air quality benefits from these projects have the following emissions reductions: 22.05 short tons for NO<sub>x</sub>, .94 short tons for particulate matter 2.5 (PM<sub>2.5</sub>), 1.41 short tons for hydrocarbons (HC), 4.33 short tons for carbon monoxide (CO), and 370.33 short tons for carbon dioxide (CO<sub>2</sub>).

**Estimate of Anticipated NO<sub>x</sub> Reductions (5.2.3):**

The estimate of anticipated NO<sub>x</sub> reductions from these projects are 22.05 short tons (lifetime).

**Identification of Government Entity Responsible for Reviewing and Auditing Expenditures of Eligible Mitigation Action Funds to Ensure Compliance with Applicable Law (5.2.7.1):**

Iowa Department of Transportation - Planning, Programming, and Modal Bureau

**Describe how the Beneficiary will make documentation publicly available (5.2.7.2):**

The public may access documents pursuant to Iowa Code, Chapter 22 and 761 I.A.C.4. In addition, information will be available on Iowa's VW website at <https://www.iowadot.gov/vwsettlement>.

**Describe any cost share requirement to be placed on each NO<sub>x</sub> source proposed to be mitigated (5.2.8):**

Projects selected for funding will be reimbursed up to the maximum dollar amount per vehicle or the percentage of total costs per vehicle, whichever is less.

Class 8 Local Freight projects will be reimbursed as such: \$60,000 per vehicle or 25% for non-government or 30% for government of total project costs for diesel replacements.

**Describe how the Beneficiary complied with subparagraph 4.2.8, related to notice to U.S. Government Agencies (5.2.9):**

On February 22, 2018, the Iowa DOT emailed representatives from the National Park Service, U.S. Fish and Wildlife Service, and Department of Agriculture, providing a copy of the State Trust Agreement and informing them of the availability of the funds.

**If applicable, describe how the mitigation action will mitigate the impacts of NO<sub>x</sub> emissions on communities that have historically borne a disproportionate share of the adverse impacts of emissions (5.2.10):**

To ensure health and environmental benefits for areas that bear a disproportionate share of air pollution and people most adversely affected by Volkswagen's actions, the Iowa DOT's project selection was influenced through the scoring and ranking of projects that were located in 1) counties with higher concentrations of mobile source NO<sub>x</sub> emissions, 2) counties with higher concentrations of non-point source NO<sub>x</sub> emissions, 3) counties with higher rates of asthma and heart failure, 4) counties with higher rates of poverty, young and elderly populations, and non-

white populations, and 5) counties with a higher share of registered non-compliant Volkswagen subject vehicles.

## ATTACHMENT B

### ELIGIBLE MITIGATION ACTION MANAGEMENT PLAN INCLUDING DETAILED BUDGET AND IMPLEMENTATION AND EXPENDITURES TIMELINE

#### MANAGEMENT PLAN SCHEDULE AND MILESTONES

| MILESTONE                                                                                                                                             | COMPLETION DATE                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Iowa DOT Provides Notice of Availability of Mitigation Action Funds                                                                                   | November 20, 2018                                                       |
| Project Sponsor Submits Proposal to Iowa DOT by Deadline                                                                                              | March 5, 2021                                                           |
| Iowa DOT Awards Funding for VW Settlement Funding Cycle 3                                                                                             | June 18, 2021                                                           |
| Iowa DOT Send out Award Letters to Project Sponsors                                                                                                   | June 18, 2021                                                           |
| Project Funding Agreements Signed by Iowa DOT and Project Sponsors                                                                                    | July 2021 onward                                                        |
| Project Sponsors Enter into Purchase Orders, etc. - Start                                                                                             | July 2021 onward                                                        |
| Iowa DOT Submits Funding Request to Trustee (Appendix D-4)                                                                                            | November 18, 2022                                                       |
| Trustee Acknowledges Receipt of Funding Request                                                                                                       | Receipt from Trustee                                                    |
| Trustee Allocates Requested Share of Funding                                                                                                          | Transfer Date                                                           |
| Project Sponsors Enter into Purchase Orders, etc. - Complete                                                                                          | November 2021 onward                                                    |
| Project Sponsors Start Replacements                                                                                                                   | November 2021 onward                                                    |
| Project Sponsors Complete Replacements                                                                                                                | July 2021 - December 2023                                               |
| Project Sponsor provides detailed invoices for all claimed project costs, scrappage requirements, and other required documentation for reimbursement. | July 2021 - December 2023                                               |
| Iowa DOT reviews documentation, certifies completion, requests additional information if needed, and provides reimbursement.                          | July 2021 - December 2023                                               |
| Iowa DOT Submits Semi-annual reports on project status and expenditures to Trustee                                                                    | Within six months of disbursement;<br>January 30 and July 30 thereafter |

## ATTACHMENT B

### ELIGIBLE MITIGATION ACTION MANAGEMENT PLAN INCLUDING DETAILED BUDGET AND IMPLEMENTATION AND EXPENDITURES TIMELINE

#### BUDGET

| Budget Category   |                                     | Total Approved Budget | Share of Total Budget Funded by the Trust | Cost-Share Amount Funded by Project Recipient |
|-------------------|-------------------------------------|-----------------------|-------------------------------------------|-----------------------------------------------|
| 1                 | Equipment Expenditure               |                       |                                           |                                               |
|                   | 1 Keokuk County Highway Department  | \$200,000.00          | \$60,000.00                               | \$140,000.00                                  |
|                   | 2 City of Pleasant Hill             | \$181,172.00          | \$54,351.60                               | \$126,820.40                                  |
|                   | 3 Washington County Secondary Roads | \$210,000.00          | \$60,000.00                               | \$150,000.00                                  |
|                   | 4 Lee County Secondary Roads        | \$282,000.00          | \$84,600.00                               | \$197,400.00                                  |
|                   | 5 Freight Equipment Leasing, LLC    | \$1,358,616.00        | \$339,654.00                              | \$1,018,962.00                                |
|                   | 6 Cedar Rapids CSD                  | \$195,000.00          | \$58,500.00                               | \$136,500.00                                  |
|                   |                                     |                       |                                           |                                               |
| 2                 | Contractor Support                  | \$0.00                | \$0.00                                    | \$0.00                                        |
| 3                 | Subrecipient Support                | \$0.00                | \$0.00                                    | \$0.00                                        |
| 4                 | Administrative                      | \$0.00                | \$0.00                                    | \$0.00                                        |
| <b>Totals</b>     |                                     | <b>\$2,426,788.00</b> | <b>\$657,105.60</b>                       | <b>\$1,769,682.40</b>                         |
| <b>Percentage</b> |                                     | 100.0%                | 27.1%                                     | 72.9%                                         |

## ATTACHMENT B

### ELIGIBLE MITIGATION ACTION MANAGEMENT PLAN INCLUDING DETAILED BUDGET AND IMPLEMENTATION AND EXPENDITURES TIMELINE

#### PROJECTED TRUST ALLOCATIONS

|                                                                                                                  | 2018            | 2019            | 2020            | 2021            | 2022            |
|------------------------------------------------------------------------------------------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| 1. Anticipated Annual Project Funding Request to be paid through the Trust                                       | \$588,733.37    | \$3,004,848.29  | \$1,480,878.96  | \$4,481,248.97  | \$3,728,298.10  |
| 2. Anticipated Annual Cost Share                                                                                 | \$3,447,985.58  | \$10,541,018.68 | \$5,036,174.04  | \$12,141,609.59 | \$10,124,269.90 |
| 3. Anticipated Total Project Funding by Year (line 1 plus line 2)                                                | \$4,036,718.95  | \$13,545,866.97 | \$6,517,053.00  | \$16,622,858.56 | \$13,852,568.00 |
| 4. Cumulative Trustee Payments Made to Date Against Cumulative Approved Beneficiary Allocation                   | \$0.00          | \$588,733.37    | \$3,593,581.66  | \$5,074,460.62  | \$9,555,709.59  |
| 5. Current Beneficiary Project Funding to be paid through the Trust (line 1)                                     | \$588,733.37    | \$3,004,848.29  | \$1,480,878.96  | \$4,481,248.97  | \$3,728,298.10  |
| 6. Total Funding Allocated to for Beneficiary, inclusive of Current Action by Year (line 4 plus line 5)          | \$588,733.37    | \$3,593,581.66  | \$5,074,460.62  | \$9,555,709.59  | \$13,284,007.69 |
| 7. Beneficiary Share of Estimated Funds Remaining in Trust                                                       | \$21,201,737.70 | \$20,613,004.33 | \$17,608,156.04 | \$16,127,277.08 | \$11,646,028.11 |
| 8. Net Beneficiary Funds Remaining in Trust, net of cumulative Beneficiary Funding Actions (line 7 minus line 5) | \$20,613,004.33 | \$17,608,156.04 | \$16,127,277.08 | \$11,646,028.11 | \$7,917,730.01  |

## **ATTACHMENT C**

### **DETAILED PLAN FOR REPORTING ON ELIGIBLE MITIGATION ACTION IMPLEMENTATION**

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Consistent with 5.2.11 of the *Environmental Mitigation Trust Agreement for State Beneficiaries* (Trust), Beneficiaries must submit with their Appendix D-4 request for Eligible Mitigation Action funding a detailed plan for reporting on Eligible Mitigation Action implementation. The Iowa Department of Transportation (DOT) intends to achieve the Beneficiary Reporting Obligations as outlined with 5.3 of the Trust.

The Iowa DOT is devoted to carrying out the reporting requirements of the Trust, according to 5.3, Beneficiary Reporting Obligations, as described below:

For each Eligible Mitigation Action, no later than six months after receiving its first disbursement of Trust Assets, and thereafter no later than January 30 (for the preceding six-month period of July 1 to December 31) and July 30 (for the preceding six-month period of January 1 to June 30) of each year, each Beneficiary shall submit to the Trustee a semiannual report describing the progress of implementing each Eligible Mitigation Action during the six-month period leading up to the reporting date (including a summary of all costs expended on the Eligible Mitigation Action through the reporting date). Such reports shall include a complete description of the status (including actual or projected termination date), development, implementation, and any modification of each approved Eligible Mitigation Action. Beneficiaries may group multiple Eligible Mitigation Actions and multiple sub-beneficiaries into a single report. These reports shall be signed by an official with the authority to submit the report for the Beneficiary and must contain an attestation that the information is true and correct and that the submission is made under penalty of perjury. To the extent a Beneficiary avails itself of the DERA Option described in Appendix D-2, that Beneficiary may submit its DERA Quarterly Programmatic reports in satisfaction of its obligations under this Paragraph as to those Eligible Mitigation actions funded through the DERA Option. The Trustee shall post each semiannual report on the State Trusts public-facing website upon receipt.

**ATTACHMENT D**  
**DETAILED COST ESTIMATES FROM SELECTED OR POTENTIAL VENDORS FOR EACH PROPOSED**  
**EXPENDITURE EXCEEDING \$25,000.**

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Consistent with 5.2.6 of the *Environmental Mitigation Trust Agreement for State Beneficiaries* (Trust), Beneficiaries must submit for each proposed expenditure exceeding \$25,000, detailed cost estimates from selected or potential vendors.

The Iowa DOT is devoted to carrying out the reporting requirements of the Trust, according to 5.2.6, as detailed. Project applicants were requested to submit the total cost for each new vehicle in their grant application and the source of their estimate. The applicants' source of the estimate could be based on: 1) informal quotes from vendors with no obligation to purchase, 2) quotes received on a recent similar project, 3) actual costs of a recently completed similar project, or 4) other, of which they would need to specify in the application.

Class 8 Local Freight projects will be reimbursed as such: \$60,000 per vehicle or 25% for non-government or 30% for government of total project costs for diesel replacements, whichever is less.

Please see the following page for a breakdown of reimbursements from awarded applications.

## ATTACHMENT D continued

| Applicant                         | Mitigation Sub-Category                 | New Fuel Type | Number of Vehicles | Total Project Cost | Cost per Vehicle | Funding Request | Funding Awarded | Award per Vehicle |
|-----------------------------------|-----------------------------------------|---------------|--------------------|--------------------|------------------|-----------------|-----------------|-------------------|
| Keokuk County Highway Department  | Class 8 Local Freight and Drayage Truck | Diesel        | 1                  | \$200,000.00       | \$200,000.00     | \$60,000.00     | \$60,000.00     | \$60,000.00       |
| City of Pleasant Hill             | Class 8 Local Freight and Drayage Truck | Diesel        | 2                  | \$181,172.00       | \$90,586.00      | \$54,351.60     | \$54,351.60     | \$27,175.80       |
| Washington County Secondary Roads | Class 8 Local Freight and Drayage Truck | Diesel        | 1                  | \$210,000.00       | \$210,000.00     | \$60,000.00     | \$60,000.00     | \$60,000.00       |
| Lee County Secondary Roads        | Class 8 Local Freight and Drayage Truck | Diesel        | 2                  | \$282,000.00       | \$141,000.00     | \$84,600.00     | \$84,600.00     | \$42,300.00       |
| Freight Equipment Leasing, LLC    | Class 8 Local Freight and Drayage Truck | Diesel        | 12                 | \$1,358,616.00     | \$113,218.00     | \$339,654.00    | \$339,654.00    | \$28,304.50       |
| Cedar Rapids CSD                  | Class 8 Local Freight and Drayage Truck | Diesel        | 1                  | \$195,000.00       | \$195,000.00     | \$58,500.00     | \$58,500.00     | \$58,500.00       |

|                                                | New Fuel Type | Number of Vehicles | Total Project Cost    | Cost per Vehicle    | Funding Request     | Funding Awarded     | Award per Vehicle  |
|------------------------------------------------|---------------|--------------------|-----------------------|---------------------|---------------------|---------------------|--------------------|
| <b>TOTAL -- AWARDED APPLICATIONS (6)</b>       | <b>All</b>    | <b>19</b>          | <b>\$2,426,788.00</b> | <b>\$127,725.68</b> | <b>\$657,105.60</b> | <b>\$657,105.60</b> | <b>\$34,584.51</b> |
| <i>Class 8 Local Freight and Drayage Truck</i> | <i>Diesel</i> | <i>19</i>          | <i>\$2,426,788.00</i> | <i>\$127,725.68</i> | <i>\$657,105.60</i> | <i>\$657,105.60</i> | <i>\$34,584.51</i> |