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January 5, 2018
Paula Wilson
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1410 N. Hilton, Boise, Id 83706

Dear Idaho VW Beneficiary Plan Interagency Team:

Thank-you for the opportunity to provide comments on the State of Idaho Volkswagen Beneficiary Mitigation Plan. Yellowstone-Teton Clean Cities is a non-profit serving the Greater Yellowstone Ecosystem, including eastern Idaho. Our mission is to reduce petroleum use in the transportation sector. We accomplish this primarily through the promotion of alternative fuels.

We would first like to provide comments to some of the questions posed in section 5 of the draft plan. Please find our comments in bold.

1.) Should Idaho consider using trust funds on government as well as nongovernment owned vehicles and/or facilities? **Yes**

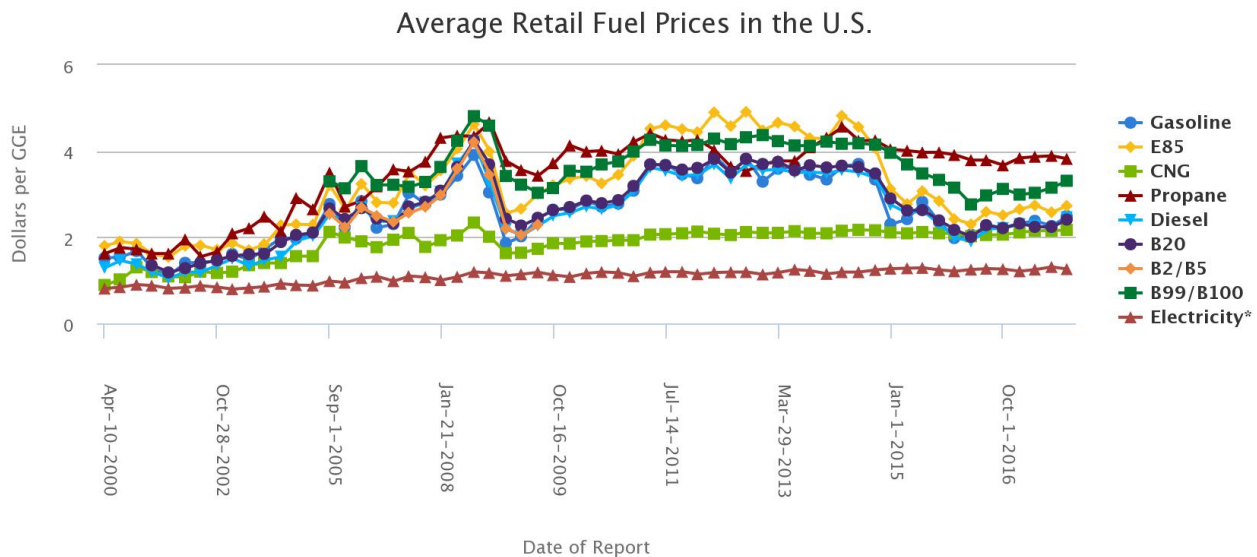
2.) How can Idaho best maximize the air quality benefits resulting from the trust? **Maximizing air quality benefits can be accomplished by prioritizing alternative fuels and by prioritizing projects that have the largest NOx and greenhouse gas emissions. This can be accomplished through the project evaluation matrix, with the inclusion of criteria areas for alternative fuels and NOx and greenhouse gas emissions. YTCC recommends these categories be in the highest point category.**

3.) Should Idaho fund projects at the maximum amount eligible under the trust or should Idaho fund some or all projects at a lesser amount in order to best maximize the use of funds? **YTCC recommends a mixture of both. Requiring a match could potentially exclude some effective projects from entities that simply don't have the funds but have the need and capacity to take on a project.**

4.) Should Idaho set aside funds for particular categories of projects or applicants. **YTCC recommends Idaho set aside a portion of the funds for emerging technologies. In year 3, there could potentially be new vehicles or EVSE station options that are currently not on the market today. Things are changing rapidly in this industry and these funds provide an unprecedented opportunity to help catalyze the shift to alternative fuel and new efficient technologies.**

5.) Should preference be given to certain fuels, such as diesel, compressed natural gas, propane, hydrogen fuel cell, or battery electric? **As mentioned earlier, priority should be placed on alternative fuels. Purchasing diesel vehicles is just business as usual. These funds should be utilized on vehicles and fuels that otherwise may not be purchased.**

6.) What are the costs and benefits of replacing or repowering vehicles with “alternate fueled” or “all-electric” engine technologies, as defined by Appendix D-02 of the Consent Decree? **The cost is simply the cost of the vehicle. An “alternate fueled” or “all-electric” vehicle is typically about \$10-\$40,000 more expensive at time of purchase than a traditional gasoline or diesel vehicle. However, the cost of alternative fuels is generally less and more consistent than gasoline or diesel. The benefits of “alternate fueled” or “all electric” vehicles are the fuel cost savings as well as the greenhouse gas emission savings.**



*Last updated: December 2017
 Printed on: December 8*

Figure 1. Average Retail Fuel Prices in the US. Electricity and CNG prices are low and consistent compared to other fuels.

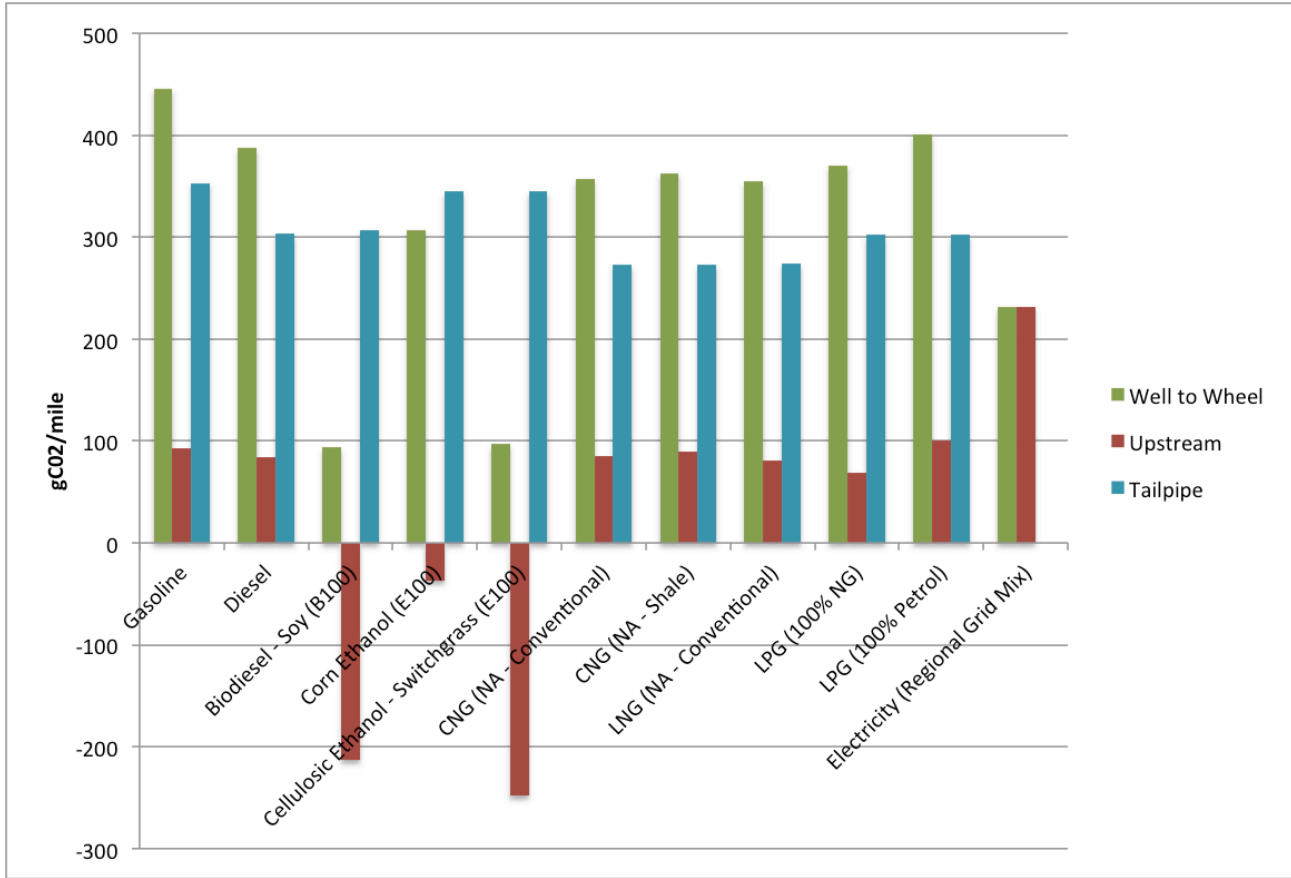


Figure 2. Well to Wheel grams of CO₂ emitted per mile driven using transportation fuels

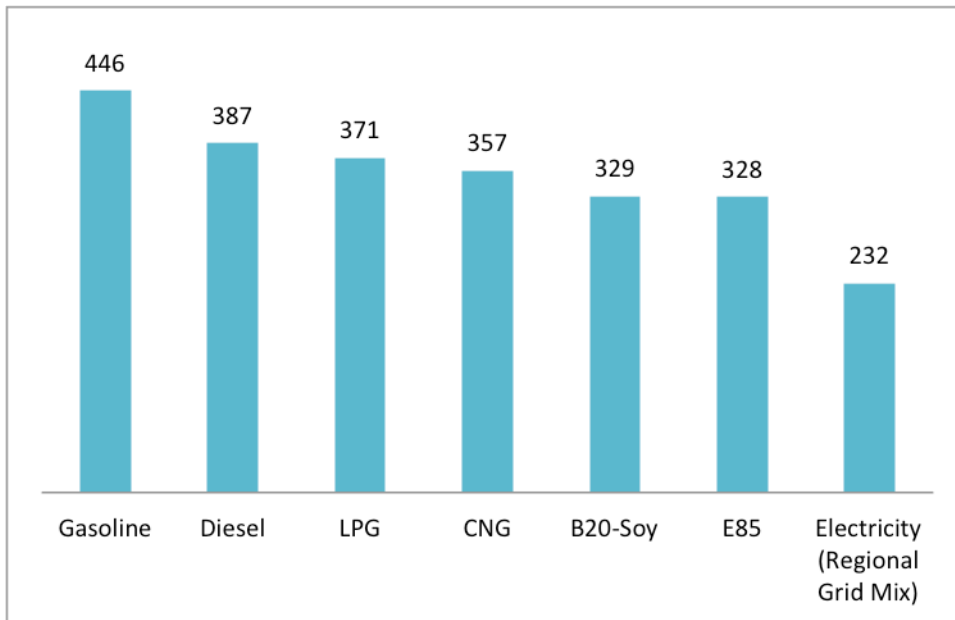


Figure 3. Well to Wheel grams of CO₂ emitted per mile driven while using transportation fuels.

7. What percentage of trust funds, if any, should Idaho devote to light-duty ZEV supply equipment? **YTCC recommends the full 15% allowable. The mobile emission sources by category and eligibility listed on page 5 of the draft plan show 34% of emissions are due to non-eligible vehicles, which I believe are on-road light-duty vehicles. Most electric vehicles are light duty vehicles, so by providing 15% of funds towards EVSE, the state of Idaho could still addressing the source of 34% of its emissions.**

8. Should Idaho expend trust funds on the DERA option? **Yes, but only a small percentage.**

9. What is the best method or approach to determine whether a proposed project will benefit areas that have been disproportionately impacted by emissions of NO_x or other pollutants? **During the project application process, a percentage of time associated with where the vehicle operates should be supplied. A vehicle operating 100% of the time in an impacted area can have a greater benefit than a vehicle that simply drives through.**

In addition to the above comments, YTCC would like to provide a few additional recommendations. YTCC would like to see EVSE installation locations considered outside of the alternative fuel corridor as well. There is a need for stations connecting Idaho Falls to the Wyoming border, to allow for a fully electric journey from Idaho Falls to Grand Teton and Yellowstone National Parks at their southern entrance. We would also recommend establishing consistency of the EVSE and technology deployed throughout the state to allow for ease of use and reduction in confusion by users of the equipment.



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A voluntary funding match should have low possible points as it may exclude some great projects from entities with smaller budgets.

YTCC also suggests ID DEQ utilize the Department of Energy AFLEET tool. This tool includes alternative fuels in the emission calculations whereas the Diesel Emission Quantifier does not. The AFLEET tool was updated in August of 2017 to include updated NO_x emissions estimates. A key thing to note is that research has found diesel vehicles to have much higher emissions in real world settings than in lab settings/certification. Therefore, diesel in-use emissions multiplier sensitivity case was also added to the August release of AFLEET. As the purpose of these funds is to reduce NO_x emissions, we recommend using a tool that can evaluate all projects on a level playing field. A webinar and presentation about this tool can be found here: <https://cleancities.energy.gov/webinars - 11923>. Please do not hesitate to reach out to me with any questions about this tool.

Thank-you for providing this opportunity to comment on Idaho's draft VW Beneficiary Mitigation Plan. YTCC also thanks ID DEQ for the amount of time and resources that have gone into creating a well thought out and comprehensive plan.

Sincerely,

Alicia Cox

A handwritten signature in black ink that reads "Alicia Cox". The signature is written in a cursive, flowing style.

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