

January 5th, 2018

Tiffany Floyd
Air Quality Division Administrator

Michael Brown
Environmental Resources Discipline Lead

Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

Dear Ms. Floyd and Mr. Brown,

First we would like to thank you for hosting an opportunity in December for diverse stakeholders to learn more and ask questions regarding plans for the \$17 million allocated to Idaho from the Volkswagen Settlement. We really appreciated the open forum and engagement with DEQ staff that has undertaken an incredible amount of work, thank you.

The Idaho Chapter Sierra Club is writing on behalf of our 3, 500 members statewide to provide written input on the Draft Beneficiary Mitigation Plan the Idaho Department of Environmental Quality has put forth for public comment. The Sierra Club position continues to mirror our original comments to the DEQ recommending the allocation of **15 percent of the total to build out statewide DC fast charging** and the remaining **85 percent on electric vehicle procurement**.

15 percent of the total to build out statewide DC fast charging

Based on our position, we are incredibly pleased to see that the DEQ has partnered with the Office of Energy and Mineral Resources to spend the maximum allotted amount for charging infrastructure on a buildout of a fast charging system along Idaho's major transportation corridors. We are truly encouraged to see the direction of this spending and want to urge that DEQ makes this a priority in the first round of funding, spending as much of the money allotted for infrastructure as feasible in the first year.

The reason funding should be prioritized on implementing infrastructure projects is that it's backed by a tremendous amount of work, has widespread public support, and provides the most emission reductions of any project area. First, the plan is supported by work that has been done by the Idaho Department of Transportation on alternative fuel corridors, Idaho Power Company in developing the tiered fast charging map for infrastructure development, and the memorandum of understanding signed by seven western governors in the spring on 2017. This idea has support from both state agencies, private interests and public advocacy groups. It also claims the highest predicted emission reduction potential. The technology is also ready to deploy in a way that will not meaningfully change in terms of price or makeup over the next few years, meaning there is no benefit from a slow implementation process.

85 percent on electric vehicle procurement

We continue to advocate that all remaining funds be used exclusively on the electrification of the transportation sector, which we do not see reflected in the current draft plan. We recognize that there is room to move in the draft and no priority has been given to a specific fuel, thus we are encouraged that the DEQ is requesting input on this component in particular. Electricity is by far the most advantageous fuel source for Idahoans based on lower lifetime fuel/maintenance costs, in-state procurement, zero emission technology, and many additional health and environmental benefits.

We are hopeful that through the public comment process and future iterations of the mitigation plan, we will see electric vehicles prioritized based on these unparalleled benefits.

We have some additional comments on different sections of the plan, which we have provided below following the format of the DEQ Draft Mitigation Plan.

2. Air Quality

- Because “NOx plays an important role for both ozone and PM2.5 in the Treasure Valley and PM2.5 in the Logan UT/ID area” but not for other nonattainment area or areas of concern identified in the BMP, the DEQ should prioritize project areas and funding for Ada, Canyon, and Franklin counties first to address the severe air quality issues that are directly linked to nox. Other areas that are highly impacted by air pollution from diesel vehicles should receive funding on a tiered basis.

3. Goals and Priorities

- We support the goal to “promote widespread acceptance of electric and hybrid vehicles”, but want to see the language amended to include adoption as a key component of this goal. The rapid adoption of electric vehicles by entities and individuals around the state is critical to achieve concrete NOx reductions and attain the associated benefits of increase environmental and public health.
- The requirement of “experience of applicant” with diesel reduction programs might needlessly restrict access to entities that both want to and would be able to achieve significant NOx reductions through innovative programs that might be outside the bounds of their traditional experience. Sierra Club wants more clarification around this criteria and an explanation of how this would affect implementation and distribution of funding for new and innovative projects.
- We don’t support the “implementation timeline” criteria because it creates pressure for immediacy in a process that will be carried out over several years. The Trust encourages the opposite with time-based spending caps that encourage a slower, more deliberate approach of leveraging funds to encourage innovation in the transportation sector and achieve the greatest long-term NOx reductions possible with emerging technologies.
- For the “population” measure we want to make sure that this is looking at not just numeric representations, but also include a specific populations that are most at risk to the health effects of emissions. In particular, we would like to see how the DEQ can incorporate specific ways to measure the young, elderly and low-income populations that will be directly affected by each of the proposed projects. For example, looking at buses you have a number of young riders who are negatively impacted by the diesel emissions and also at higher risk for the development of negative health impacts.

4. Implementation Plan

- No clarity is provided around the process for “applicants”, we would like to see more information about how DEQ plans to request project proposals and what will be required from the applicants.
- **4.1 Light Duty Zero-Emission Vehicle Supply Equipment**
 - We fully support the outlined use of the 15% of the state’s allocation for the use of building our ZEV supply equipment and designation to OEMR. Sierra Club asks that stakeholders both in coordination and at the selection committee represent a diverse array of interests.
 - We support the funding priority areas identified with the ITD alternative fuel corridor.
 - Host site criteria amenable.
- **4.2 Trucks and Buses**
 - Sierra Club advocates for using the 35% of funding in these project categories exclusively on electric replacements or retrofits to maximize the immediate and long term NOx reductions and provide additional benefits of reduced fuel, maintenance and operation costs.
- **4.3 Locomotives, Airport Equipment, and Forklifts**

- Sierra Club advocates for using the any funding nn these project categories exclusively on electric replacements or retrofits to maximize the immediate and long term NOx reductions and provide additional benefits of reduced fuel, maintenance and operation costs.
- We would like more clarity around the way these projects overlay with priority air quality areas and pollution by emission source information identified the air quality section of the mitigation plan.
- **4.4 DERA Option**
 - The Sierra Club advocates that these funds be shifted to prioritize projects that lead to the adoption of electric vehicles to maximize the immediate and long term NOx reductions and provide additional benefits of reduced fuel, maintenance and operation costs.
 - Want more information about the lifetime NOx reductions associated with the retrofiting programs as compared to the option of electrification.

5. Public Input

1. We would support any funding that increases the number of zero emission vehicles.
2. We would like to see a flexible process that awards projects depending on the need of the applicant and scope of expected beneficiary of said project. This is why we would like to see more information about how the DEQ plans to build in transparency, diverse stakeholder involvement and public input into the funding decision process.
3. We recommend the State Beneficiary Plan focus funding on the electrification of public school buses, shuttles and public transit. Diesel school buses are a leading source of NOx emissions. They tend to operate in areas with the worst air quality generally, and locally increase emission exposure to children. Market proven zero emission buses produce the largest NOx emission reductions compared to any other technology in addition to locking in annual savings on fuel, maintenance and operation to bring measurable economic and environmental benefits to the communities they service, while providing a funding pathway through savings for continued investment and purchase of zero emissions buses. Buses are also prominent vehicles, so they serve an educational role as a billboard to promote the market for EVs generally
4. We recommend the State Beneficiary Plan focus funding on the electrification of public school buses, shuttles and public transit.
5. Preference should be given to zero emission vehicles to maximize the immediate and long term NOx reductions and provide additional benefits of reduced fuel, maintenance and operation costs.
6. Replacing vehicles with all-electric engine technologies provides all of the emissions and cost savings benefits that newly purchased zero emission vehicles provide with the added benefit of reduced frontend capital costs.
7. The maximum allotted amount of 15% of total funds.
8. No. Although these options are available for funding, electric vehicle upgrades provide more benefits: a) keep energy dollars in state; b) grid benefits that result in rate payer savings; c) create in-state jobs; d) reduce fuel and maintenance costs; drastically reduce NOx, smog and greenhouse gas levels.
9. Prioritizing the nonattainment areas and areas of concern first. Within those communities, additionally priorities can be set based on projects that will reduce pollution exposure for our most vulnerable citizens (youth and the elderly). When looking at project funding, priority funding should be given projects that benefit historically marginalized or highly impacted communities, specifically low-income and people of color communities. Overlaying expected project beneficiaries with census data can be a helpful tool in identifying priorities along these lines.
10. In all of the manners described.
11. In addition, the Sierra Club advocates that some administrative expense to conduct public outreach should include funding that increases language accessibility by providing information and outreach in multiple languages spoken in our communities.



Thank you again for the opportunity to provide comment at the beginning of this process and including the Sierra Club and other stakeholders in the review of this draft plan. We are encouraged and excited to see the next iteration of plan and public engagement around it.

Best Wishes,

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