

From: Michael Heckler
To: [Paula Wilson](#)
Subject: Comments regarding VW Preliminary Draft BMP
Date: Thursday, January 04, 2018 11:52:17 AM

Dear Ms Wilson:

Consistent with the Idaho Preliminary Draft BMP's goal to "promote widespread acceptance of electric and hybrid vehicles" I ask that DEQ consider the following matters related to the 15% of funding associated with electric vehicle supply equipment

--[if !supportLists]-->• <!--[endif]-->The design John Chatburn presented on December 14th, one which would facilitate long range travel within the state boundaries by electric vehicles, represents the type of enabling infrastructure essential for more widespread acceptance of electric vehicles. In light of the recent revelation that VW's \$2 billion of Zero Emission Vehicle Infrastructure funds will be directed to workplaces and multi-family residences in large cities, the concern Mr. Chatburn raised in the meeting regarding potential duplication of efforts between OEMR and VW appears to have been resolved. Please consider allocating the full 15% funding for the OEMR projects during the first year in which Idaho receives beneficiary funds. Much of the baseline work associated with identifying charger locations and grid interconnections is based on mature technologies that are known now and likely won't experience substantial changes in cost-effectiveness in the next few years. By contrast, electric vehicle powertrains are rapidly improving and moving more of the remaining funding decisions later in the funds disbursement array will potentially allow harnessing more of those technological benefits.

--[if !supportLists]-->• <!--[endif]-->With the goal of providing a method for "re-fueling" electric vehicles while in use for longer range travel, please also recognize that Level 2 chargers do not provide adequately rapid recharging (perhaps 20 miles of range added per hour on the charger for a light duty vehicle) and emphasize a buildout of DC fast charging facilities.

With respect to goals associated with significant and sustained diesel emission reductions

--[if !supportLists]-->• <!--[endif]-->In the draft project selection criteria DEQ proposes granting up to 25 points based on projects alignment with Air Quality priority areas. Please ensure that allocation of these points considers the efficacy of diesel emission reductions in addressing the condition which causes each area to have its air quality problem when allocating this substantial number of points.

--[if !supportLists]-->• <!--[endif]-->In the draft project selection criteria Cost effectiveness is scaled (least, middle, most) but the measurement criterion is not listed. Please consider combining the cost effectiveness and population impact criteria into a single category that uses a ratio with tons of emissions reduced times number of persons impacted in the numerator and dollars spent to produce those reduction in the denominator. Reducing diesel pollution anywhere is a worthy goal. Reducing it where the reduction will result in the greatest health and enjoyment benefits to the largest number of Idaho citizens is even better.

With respect to measuring emission reductions –

--[if !supportLists]-->• <!--[endif]-->My understanding from the December 14th meeting was that DEQ would use an EPA methodology/tool for estimating the emission reduction potential

for various proposals. Please ensure that the relatively low level of emissions in the Idaho and Pacific Northwest electric power supply resulting from our higher than national average use of non-fossil fueled generation sources is not overlooked when comparing electric powertrain alternatives to non-diesel re-power proposals.

Thank you for this opportunity to submit comments related to the VW settlement fund.

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