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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 (YTCC) 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.

YTCC has three main comments on the plan. YTCC would like to see alternative fuels as a criteria area. A project could receive 5-10 points simply for using alternative fuels. The Cost Effective criteria area does address alternative fuels ability to efficiently reduce NO_x, however, certain newer electric vehicle technologies such as transit buses, school buses, refuse trucks and medium-duty trucks, do have a higher up-front cost. Thus the reasoning for electric to receive a higher VW trust fund match, however the project will not necessarily score well in a cost effectiveness calculation even though it has high NO_x reducing potential.

Allowable ZEV supply equipment includes installations of Level 1, Level 2, or DC Fast Charging located in public place, workplace, or multi-unit dwelling. However, the priority areas identified in the state are along major interstates with a list of key factors when choosing host sites that strongly favor Level 2 or DC Fast Charging in public places. YTCC agrees the majority of the 15% designated for EVSE should focus on DC Fast Charging, however, these priorities seem to exclude Level 1 workplace or multi-unit dwelling projects. A study by Idaho National Laboratory¹ found that on average electric vehicle drivers charged 60% at home, 35% at work and 5% in other locations. So providing funding for "home" charging at multi-unit dwelling and workplace charging is very well validated.

YTCC also wants to reiterate the importance of having all similar projects' associated emissions, calculated using the same calculator. YTCC recommends the use of 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 NO_x emissions. 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

¹ Avt.inl.gov/evproject



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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>. In addition to this tool, Argonne National Lab just released an additional tool, the [heavy and medium-duty emissions calculator](#), which is very user friendly and incorporates the background data and assumptions of the AFLEET tool. 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,

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