



March 9, 2018

Paula Wilson
Idaho Department of Environmental Quality

RE: Proterra Comments on Idaho's Draft Beneficiary Mitigation Plan ("BMP")

Proterra, the leading U.S. manufacturer of electric, zero-emission transit buses, appreciates the opportunity to provide comments on the draft BMP, which describes Idaho's overall intentions and plan for spending ~ \$17.3 million of Idaho's VW allocation funding.

Proterra strongly supports the higher funding percentage proposed for trucks and buses. But it urges the DEQ to limit funding to battery electric, zero emission transit and school buses and to increase the funding percentage from 35% to 50%. We certainly agree with the statewide focus on achieving significant reductions in diesel emission exposures in "priority air quality areas" and "areas that receive a disproportionate amount of air pollution from diesel vehicles." The state can accomplish both by investing heavily in battery electric buses. Replacing diesel buses with electric buses is simply one of the best investments the state can make to help electrify public transit and improve air quality. We believe that the best way to accomplish these and other statewide goals is to use the funds from the VW trust to fund 110% of the incremental cost of a new electric bus and associated charging infrastructure.

The proposed BMP makes clear the public importance of using the trust funds to promote "widespread acceptance of electric" vehicles. To achieve this goal, Proterra encourages the DEQ to promote the adoption of zero-emission technology, and not "near-zero" technology. Nationally, 7,461,458 tons of NOx, or 55% of the 13,489,110 tons of NOx emitted derive from mobile sources; 35% attributable to on-road sources.¹ In the state of Idaho, 67,724 tons of NOx, or 65% of the 104,737 tons of NOx emitted are from mobile sources.² On this basis alone, we urge the DEQ to use up to 50% of its funds to advance the electrification of transit and school buses in those areas disproportionately impacted by the VW diesel vehicle emissions. By doing so, Idaho will help achieve its program goals, including the reduction of NOx, greenhouse gases and other pollutants.

Thank you for the opportunity to provide comments on the draft BMP. Please feel free to contact me directly about these comments or Proterra's initial project proposal titled *The Public Transit Electrification Project: Sustainable Mobility for Idaho*. I can be reached at 864-214-2668 or emccarthy@proterra.com.

Sincerely,

Eric J. McCarthy
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Proterra Inc.

¹ <https://www3.epa.gov/cgi-bin/broker?polchoice=NOX& debug=0& service=data& program=dataprog.national 1.sas>

² <https://www3.epa.gov/cgi-bin/broker? service=data& debug=0& program=dataprog.state 1.sas&pol=NOX&stfips=16>