

**Volkswagen Draft Beneficial Mitigation Plan
State of Idaho
DEQ's Response to Comments
May 1, 2018**

Commenter (CMNTR) Key

CMNTR 1 – Idaho Conservation League	CMNTR 6 – UPS	CMNTR 11 – Mike Larkin
CMNTR 2 – Sierra Club Idaho Chapter	CMNTR 7 – Greenlots	CMNTR 12 – 131 Form E-Mail Comments
CMNTR 3 – Yellowstone-Teton Clean Cities	CMNTR 8 – Mike Settell	
CMNTR 4 – Proterra	CMNTR 9 – Kathy Dawes	
CMNTR 5 – Northwest Gas Association	CMNTR 10 – Dana Dawes	

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0	<p>Summary response to overall comments & resulting BMP changes:</p> <p>Several comments received indicated a general agreement with the direction provided in the Draft BMP, and some comments requested an additional level of detail with regard to certain aspects of how projects will be evaluated, for example how long term maintenance costs will be included and how the cost effectiveness of a project will be determined.</p> <p>Section 4.1 of the VW Environmental Mitigation Trust indicates, in part, <i>The Beneficiary Mitigation Plan need only provide the level of detail reasonably ascertainable at the time of submission. This Plan is intended to provide the public with insight into a Beneficiary's high-level vision for use of the mitigation funds and information about the specific uses for which funding is expected to be requested. Nothing in this provision is intended to make the Beneficiary Mitigation Plan binding on any Beneficiary, nor does it create any rights in any person to claim an entitlement of any kind.</i></p> <p>While many of the details requested are of legitimate concerns, and are items that DEQ intends to be transparent in their consideration of, they are details the DEQ has determined will be better included in the application package to be developed in advance of a formal application period. Additionally, some of the additional details requested to be included within the BMP are either not currently known or not developed in final form, and will be included in the formal project solicitation application package.</p> <p>For each of the Commenters' (CMNTR 1-12, detailed in key above) comments below, DEQ has copy and pasted comments verbatim from the respondents' comment letters without making any changes or typographical corrections. DEQ has grouped CMNTR's comments below in a manner similar to subject grouping in CMNTRs' letters. Most comment letters were not copy and pasted in their entirety, rather, only BMP related comments, questions, and concerns are duplicated below. For commenters' complete comments letters, please refer to the DEQ's VW Settlement website: http://www.deq.idaho.gov/vw-settlement.</p>	
1	<p>Stakeholder Engagement during Project Selection Process</p> <p>We encourage the IDEQ to engage stakeholders during the review of applications and decision-making process. We propose that the IDEQ create a stakeholder group similar to OEMR's stakeholder group tasked with reviewing applications for EV charging stations throughout the state. Stakeholder groups such as these are important to collect a diverse set of opinions on a proposal during the review of</p>	<p>As indicated in the BMP, the DEQ will develop a statewide, transparent project solicitation, evaluation, and selection process. In coordination with an interagency working group comprised of</p>

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	proposed projects.	the Idaho Transportation Department, the Division of Purchasing, and the Governor's Office of Energy and Mineral Resources, the DEQ will evaluate projects against the evaluation criteria, as well as evaluate each project against other project submissions to determine funding recommendations. At this time, there are no plans for stakeholder and/or public input into the funding decision process beyond the BMP.
1	<p>Project Evaluation – Cost Effectiveness Criteria Cost effectiveness is one of the three heaviest weighted categories in the project evaluation matrix (Table 1), worth up to 25 points. We encourage IDEQ to provide more detail to the methods and inputs used to determine the cost effectiveness of a project. Some issues to consider are:</p> <p>Included costs – Because a vehicle requires both fuel and maintenance, IDEQ must include both the fuel costs as well as any differences in operations and maintenance costs between the original and proposed project.</p> <p>Timeline – To capture all relevant costs IDEQ must consider the full-expected lifespan of the project.</p> <p>Benchmark – Cost effectiveness implies that projects will be measured against some objective criteria. ICL suggests that because this is a competitive grant application process, the benchmark should be total pounds of NOx reductions per the net cost of the project. The “net cost” accounts for changes in fuel as well as operations and maintenance.</p> <p>Quantifying Emissions Reductions – Accurately quantifying the emissions reductions is essential to achieving the goal of the Idaho’s BMP. The Consent Decree specifically allows for conversion from diesel to electric power. ICL is concerned the proposed tool, the “EPA Diesel Emissions Quantifier”, is not able to accurately account for the difference between a diesel, or natural gas, powered vehicle and an electric powered vehicle. ICL suggests IDEQ either confirms the proposed tool can make accurate conversions that account for the emissions of our local electric grid, or IDEQ should consult with the electric utilities and others to identify the appropriate tool.</p>	Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to the solicitation of project applications.
1	<p>Project Evaluation – Population Impacted We are pleased to see the IDEQ include environmental justice concerns as part of the “population impacted” criteria within the project evaluation matrix. We also agree with the IDEQ’s allocation of 25 points for this criterion. However, we recommend that the IDEQ expand the impacted population criteria in the project evaluation matrix to independently evaluate and assess the impacts to broad</p>	In Table 1, the Project Evaluation Matrix, under the Population Impacted criteria, sensitive populations are described; minority and low income populations; and populated areas within traffic proximity are included and account for both total

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	<p>populations (i.e. – number of people impacted) and target populations (i.e. - sensitive or underrepresented groups). Air quality has a disparate impact on children, elderly, and those with respiratory ailments. We recommend IDEQ subdivide the population-impacted category to include both total numbers and provide additional points for addressing emission reductions for especially vulnerable populations.</p> <p>In terms of evaluating the impacts to sensitive and/or underrepresented communities, we recommend the IDEQ advise applicants to use the EPA’s environmental justice online tool, known as ejscreen1. Ejscreen is a free, map-based database that facilitates the analysis of a number of demographic and environmental indicators. Demographic indicators include: minority population, low income population, linguistically isolated, less than high school education, under age 5, and over age 64. Germane environmental indicators include, but are not limited to: PM2.5, ozone, diesel PM, and traffic proximity. Further, ejscreen presents this information using census block data, providing information useful in assessing a projects localized beneficial impact.</p>	<p>and target populations. DEQ determined that this is the most appropriate method for the inclusion of these populations’ consideration into the Project Evaluation Matrix.</p> <p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to the solicitation of project applications.</p>
1	<p>Project Evaluation – Voluntary Funding Match</p> <p>We support providing additional points to projects that bring matching funds. The VW Settlement encourages cost sharing and ICL believes this can expand the pool of available funding for this important program. We encourage IDEQ to allow the matching funds to be contributed over a series of years instead of only in a lump sum. Allowing applicants to contribute over time aligns better with budgeting practices and fiscal reality.</p>	<p>DEQ thanks you for the support; the DEQ is not opposed to matching funds being contributed over a period of time, as allowed by the Trust, however, the timing of applicant contributions will be dependent on project specific timelines. Additional cost-share requirements will be included in the Project Application Package to be released prior to the solicitation of project applications.</p> <p>While there have been changes to Table 1, Project Evaluation Matrix point distributions, at this time no additional points were allocated to voluntary funding match. A clarification has been made that voluntary funding match points are available for contributions made above the minimum cost-share requirements in the trust.</p>
1	<p>Electrification Advertisement</p> <p>We support the electrification of transportation to the greatest extent possible. To truly maximize the benefit of electrification though it’s important to advertise this change to highlight the capability of EVs. For projects seeking to electrify vehicles, we suggest that the IDEQ require that the vehicle include signage denoting that it is an EV. This type of advertisement normalizes EVs on our roadways and will expedite their widespread adoption by the general public. Widespread adoptions of EVs will not only further reduce NOx emissions but will also serve to improve overall air quality through</p>	<p>Aside from requirements specified in the VW Settlement Environmental Mitigation Trust, DEQ does not intend to impose project requirements. To the extent that a project proposal’s activities reduce NOx emissions and the proposal quantifies those reductions, points will be assigned based on evaluation of criteria detailed in Table 1, Project</p>

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	reduction of other transportation related air pollution.	Evaluation Matrix.
1	<p>Support of 15% Towards Charging Infrastructure We again wish to stress our support of utilizing 15% of the mitigation funds to develop light-duty electric vehicle (EV) charging infrastructure throughout Idaho. We hope to see these funds used to develop DC fast charging stations along major traffic arteries throughout the state. As stated during the public meeting, widespread development of EV infrastructure will reduce the “range fear” that many potential EV owners cite as a primary reason against EV ownership. Alleviating potential EV owners from this fear and promoting the adoption of EVs will lead to an even greater reduction in NOx emissions.</p> <p>However, we encourage DEQ to refrain from hastily allocating the 15% of the VW funds to charging infrastructure projects. There are a number of lingering questions that need to be answered before an effective charging network should be constructed. Most notably, it remains unclear how charging stations will be billed by utility companies for the electricity used, and how much of those costs will be passed on to the consumer. Under current rate structures, charging stations will trigger large demand costs (up to \$1,000) due to the high, instantaneous demand required to charge a vehicle in approximately 30 minutes. If only one or two vehicles utilize a charging station over the course of the month, this expensive demand charge must either be absorbed by the business or dispersed among customers, with both potential cases being uneconomical.</p> <p>This is just one example of the hurdles that must be overcome regarding a statewide network of charging stations. While not insurmountable, we simply raise these issues to encourage DEQ to proceed at a reasonable pace when allocating funds, providing sufficient time for the regulatory/utility pricing components to keep pace with construction and utilization of a charging network.</p>	<p>OEMR has created an advisory group that consists of Non-Governmental Organizations, all of Idaho’s electric investor-owned utilities, the Idaho Consumer-Owned Utilities Association, the Idaho Public Utilities Commission, and other interested stakeholders. OEMR will continue to engage with this group throughout the process of reviewing applications to continue discussions around many of the potential challenges with this program.</p>
1	<p>Public Notification of Selected Projects We request that the IDEQ devise a plan for notifying the public when projects are selected to receive funding. The IDEQ’s listserv currently notifies the public when certain municipalities receive grants or loans for drinking water infrastructure improvements. We believe this framework could be replicated for this program as a means to notify interested parties when final selections have been made.</p>	<p>Additional detail regarding award notification will be provided in a Project Application Package to be released prior to the solicitation of project applications.</p> <p>The DEQ will provide a summary of projects funded under the VW trust on DEQ’s website.</p>
1	<p>NOx Reduction Estimates The IDEQ repeatedly cites estimates of NOx reductions due to implementation of projects throughout the final draft BMP. We are curious as to how the IDEQ calculated these estimates. It would be helpful if the final BMP included an appendix detailing the IDEQ’s calculations.</p>	<p>The emission reductions included in the BMP are only estimates based on generic projects. DEQ utilized a combination of the EPA’s Diesel Emission Quantifier and input from professionals from other state agencies in estimating emission</p>

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		<p>reductions based on current information. Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to a formal project application period.</p>
1	<p>Truck Refrigeration Units We are curious if the eligible mitigation action “forklifts and port cargo handling equipment” includes retrofits to truck refrigeration units (TRUs). The electrification of TRUs will likely be less apparent to the public relative to the electrification of a bus or truck; however, we recognize that many communities heavily impacted by air pollution are often collocated with industrial facilities, thus TRU retrofits could have a profound impact at minimizing pollution in communities with sensitive populations or that have been historically disproportionately effected. In any case, we want to ensure that TRU retrofits are included for consideration as part of the final BMP.</p>	<p>Transport Refrigeration Units (TRUs) are not an eligible mitigation action directly, however, Electrified Parking Spaces/Truck Stop Electrification (EPS/TSE) is an Eligible Mitigation Action under EMA 10, the DERA Option. The EPS/TSE technology allows for the electrification of refrigeration systems that would otherwise be powered by a vehicle’s engine.</p>
1	<p>Allocating Funds to DERA Projects The IDEQ is proposing to allocate approximately 15% of these funds to projects that are also eligible for funding under the Diesel Emission Reduction Act, or DERA. We feel that funding full electrification retrofits is the best investment for the VW settlement money, both in terms of monetary value and air quality reductions, and thus should be prioritized. This BMP is currently the sole opportunity to partially fund fully electric retrofits, whereas projects that would qualify for DERA already have a designated funding source. It does not make sense to us to use all funding sources on a specific type of project (i.e. – DERA retrofit), when greater air quality benefits can be achieved through better dispersal of available funding (i.e. – BMP for electrification, DERA for diesel retrofits).</p>	<p>As indicated in Section 4.4 of the Draft BMP, there are eligible mitigation actions available under the DERA option that are not allowed under eligible mitigation actions 1-9. The DERA option is not limited to only diesel retrofits. Utilizing VW settlement funds as matching funds to EPA DERA grants may facilitate the execution of diesel emission reduction projects that might otherwise not be funded. In addition, the EPA provides additional bonus grant funds when states contribute matching funds, resulting in an increase in overall grant funding.</p> <p>DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
2	<p>Idaho Air Quality We concur with the Plan’s stated goals to reduce the risk of Idaho nonattainment designations and to address their contributing sources – PM25, NOx, and other pollutants that are listed under the National Ambient Air Quality Standards (NAAQS). However, we agree that NOx reduction opportunities should</p>	<p>Thank you for your comments; we agree that the goals and evaluation criteria outlined in the BMP will result in reduction opportunities which will reduce related emissions in nonattainment areas,</p>

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	<p>be a priority given the transportation sector is a primary driver of direct human induced ground level ozone. While funds from this settlement cannot readily address non-road NOx emissions and other air-quality threats (such as fires or industrial emissions), we believe these funds can deliver immediate and long- lasting benefits through reducing vehicle-based NOx emissions, particularly in Southwest Idaho.</p> <p>While it is important that the benefits of Idaho Settlement investments accrue to all, it is also important that investments are made or prioritized in ways that recognize the most urgent needs of those parts of Idaho either at nonattainment or at most risk of becoming so.</p>	<p>areas of disproportionately impacted populations whom are most urgently in need.</p>
2	<p>Goals and Priorities</p> <p>In the project evaluation matrix, the <i>total points possible</i> allocation method in the Draft is structured well overall. However, we have some recommendations and questions we would like to see addressed:</p> <ul style="list-style-type: none"> - The cost effectiveness criteria should include “projects that reduce the most NOx emissions for the least dollars spent” that are measured by the <i>lifetime</i> costs and emission reductions of the vehicle rather than only the upfront cost of the technology and <i>lifetime</i> emission reductions. Including the lifetime measure singularly for emission reductions prevents a full scope of financial analysis of each project, disregarding the cost savings that can be leveraged for future clean transportation investments by the project beneficiaries. - We recommend against the 10 points allocated to implementation time (how quickly actual emission reductions can be achieved). It seems counterproductive to the overall scope of the project, which is to maximize emission reductions. We would prefer to see priority given to innovative and thoughtful planning for investments that achieve deep emission reductions as opposed to projects that can be quickly implemented but achieve lesser emission reductions over time. - With regard to the population impacted criteria, which has an ample 25 possible points, we believe measuring this metric should include an analysis of technology specific population impacts. For example, the population served by school buses are more susceptible to the health impacts of diesel emissions that the general population as a result of their age. Another example is that public transit riders generally hold marginalized identities that face higher rates of health impacts from transportation pollutants. - Regarding the applicant experience criteria, we agree there is value in acknowledging that applicants “demonstrate experience and existing administrative and programmatic structure in place for implementing diesel reduction or offset projects.” We note that with these fast-changing 	<p>Thank you for your supportive comments.</p> <p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to the solicitation of project applications.</p> <p>Table 1, Project Evaluation Matrix under the subject criteria has been changed. The implementation time criterion has been removed from the project evaluation matrix.</p> <p>Similar to the response to the cost effectiveness comment above, additional details with regard to methods and inputs DEQ will use to evaluate, as well as instructions to applicants on <i>how</i> responses will be evaluated will be included in the application package. The Population Impacted criterion does describe sensitive populations. To the extent a project proposal describes how their proposal project will impact these types of populations, points will be awarded appropriately.</p> <p>DEQ agrees with this comment and recognizes the need not to overlook that value of innovative and potentially new technologies. DEQ also recognizes</p>

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	technologies, track records may be significant, but the value of innovation and potential of new technologies should not be overlooked.	that the breadth of eligible mitigation actions is closely controlled by the Trust, and that the potential for innovation is necessarily limited to sideboards of the eligible mitigation actions.
2	<p><u>Implementation Plan</u> Light-Duty Zero-Emission Vehicle Supply Equipment</p> <p>We agree with the DEQ plan to use fund “to advance electric vehicle adoption throughout Idaho, as opposed to other ZEV options, by establishing a comprehensive charging network for EVs, which shall be known as the Electric Vehicle Supply (EVSE Program),” and that “installing the charging network an implementing the EVSE program is an eligible mitigation action consistent with the energy use goals and objectives of the state of Idaho. The Trust allows Idaho to set aside 15 percent of the state’s allocation (approximately \$2.83 million) for light-duty ZEV supply equipment.”</p> <p>We support DEQ’s ongoing partnership with state stakeholders Office of Energy and Mineral Resources, Idaho Transportation Department, and Division of Purchasing to analyze the most appropriate options for mapping out Idaho’s future DC EV charging infrastructure. However, with regard to the Plan’s proposal that “Funds for EVSE will be available statewide, with an emphasis on priority areas identified using the ITD alternative fuel corridor map (Figure 7) on Plan P. 12, we note the absence of Idaho Power’s map of tiered priority areas for DC fast-charging infrastructure siting, please consider including this map as a guide for locale opportunities. We also highly encourage continued attempts to get information about other partners working on charging infrastructure, both in Idaho and boarding states, to ensure complete EV corridor development and minimize duplication of investments.</p> <p>We also ask for clarification or supporting documentation underlying the statement (P.14) that “Idaho estimates that each charging station will result in a reduction of about 12 tons of NOx over the life of the station, resulting in an estimated reduction of about 360 tons of NOx.” A reference to the source of a reliable formula or the calculation method(s) would be helpful.</p> <p>As stated in our comments on the Draft Plan, we encourage deployment of this portion of the Settlement funds as soon as practical. Idaho’s allocation of these funds will help inform decisions by other public and private parties considering similar or complimentary charging infrastructure investments.</p>	<p>Thank you for your comment. The Idaho Power map of tiered priority areas for DC-fast-charging infrastructure was developed at the same time as the ITD alternative fuel corridor map. Each map depicts a similar idea- one with a focus on the highways and interstates (ITD), the other with a focus on cities and towns along those routes (Idaho Power) - that Idaho plans to focus on specific routes to place EV charging stations. The exact location shown on Idaho Power’s map may not provide the best opportunity for EV Infrastructure.</p> <p>DEQ utilized input from professionals from other state agencies in estimating emission reductions based on current information.</p>

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	<p>Timely deployment of investments in statewide EV charging infrastructure also promise the most immediate and significant emission reductions, particularly given that this DC fast-charging technology is actionable now. Focusing the first few years of funding in this project area then provides the benefit of most reduction per dollar spent and an expedited timetable for those reductions to be achieved. In addition, a focus on this project area while holding off on other investments will allow unfolding electric vehicle technologies more time to mature to market ready and financially competitive options.</p> <p>Timely installation of DC fast charging-stations can immediately and meaningfully address “range anxiety” by providing charging infrastructure that facilitates EV commuting between distant metropolitan areas using existing EV technologies. While the proliferation of level 2 chargers has helped facilitate EV travel within metropolitan areas, there remains dire need for DC fast-charging infrastructure to allow for more EV owners to make long-distance trips. Additionally, these charging stations will also provide valuable public education opportunity through helping make more Idahoans aware of the affordable and clean transportation options on the market today.</p>	
2	<p>Subsequent Project Areas (4.2, 4.3, 4.4) We believe that electrification of transportation in all public and private sectors must remain a priority given the unparalleled lifetime emission reductions as opposed to other fossil fuel options. Additionally, EVs realize significant savings from reduced lifetime maintenance and operation costs, provide a critical role in future clean transportation investments opportunities by the beneficiary, and support the distributed, clean grid of the future. We encourage that fuel preference should be shifted away from fossil fuels to electric for each of the project categories included in the Plan where the technology exists, like the explicit electric fuel preference listed in the for airport equipment (4.3). In particular, in direct relationship with our comments about the impacted populations, the Sierra Club would like to see a fuel preference for bus investments in the Plan.</p> <p>4.2 Trucks and Buses Prices for all electric buses are dropping. Over the last 4 years, bus costs from two of the leading electric bus vendors, Proterra and BYD, have dropped \$200,000 to \$250,000 or 20-25% to about \$750,000. Both makers estimate further cost reductions of about \$100,000 by 2022 to \$650,000. This decline is consistent with CARB’s recent white paper on battery costs forecasting a \$100,000 or more decrease by 2020 and continuing to decline through 2030. Additionally, adoption of electric buses is increasing with major purchases and contracts by counties and transit agencies across the country. Finally, the costs from maintenance and operation drop significantly for electric buses when compared with new diesel buses, providing long-term financial savings for the project beneficiaries, opening up opportunities for continuous investments in new clean transportation technologies. With the sum of these benefits</p>	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p> <p>In an effort to comport with DEQ’s decision to take a technology/vehicle neutral approach to project funding, the DEQ does not intend to delay project implementation to allow for the reduction in the price of specific technologies.</p>

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	<p>and the pending emergence of electric bus conversion technologies, we believe holding off on initial investment of these funds to allow more time for these technologies to mature will maximize the benefits procured through the VW settlement funds for the state of Idaho.</p> <p>As you know, we agree with the emphasis on “maximizing the amount of diesel emissions reduce each year per dollar spent,” but we also believe it is important that this metric be applied <i>over the lifetime of the vehicle</i> so that it best reflects the efficacy of the investment. Therefore, the cost should include both the upfront purchasing cost and the estimated lifetime costs of the vehicle (maintenance, operation, fuel).</p> <p>We would like to ask for transparency for the expected NOx reductions for each of these vehicle categories to be broken down by fuel type. With no fuel preference, it is unclear to us how DEQ arrived at the calculations for the estimated total lifetime reductions, especially in categories where DEQ held open space for both alternative fuel and all electric engine investments.</p> <p>We want ensure that we have clarity around what each technology type is projected to achieve for emission reductions so that we can have a better understanding of how each technology will compete based on the criteria in the project evaluation matrix.</p>	<p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to a formal project application period.</p> <p>The information that will be provided in the Application Package will include <i>how</i> DEQ will arrive at the estimated reductions used when evaluating project proposals. The emission reductions included in the BMP are only estimates based on generic projects. DEQ utilized a combination of the EPA’s Diesel Emission Quantifier and input from professionals from other state agencies in estimating emission reductions based on current information.</p>
2	<p>DERA funding Funding from the Diesel Emission Reduction Act (DERA) is unpredictable and the Plan should reflect such uncertainties as reliant on continued Congressional appropriation. The Plan attributes (Table 2) an estimated 71 tons of NOx emissions due to DERA-related investments, but again, the future of that funding remains a large unknown. The Plan should be prepared to re-deploy those funds to other Eligible Mitigation Action (EMA) categories if needed.</p> <p>The Plan indicates (P. 15) that “Idaho expects to spend 15 percent of funds for projects under the DERA option” and that “Idaho analyzed a sample of eligible projects that include replacing school buses, short-haul trucks, transit buses, and construction equipment with new diesel vehicle or equipment. The estimated total lifetime emission reductions from this group are approximately 71 tons of NOx.” Similarly, it would help to explain the calculations (also P. 15) behind the statement that “The estimated total lifetime reductions from this group (locomotives, airport equipment, and forklifts,</p>	<p>Section 4.4 of the BMP has been revised to include a statement describing contingencies associated with the potential absence of DERA funding.</p> <p>The emission reductions included in the BMP are only estimates based on generic projects. DEQ utilized a combination of the EPA’s Diesel Emission Quantifier and input from professionals from other state agencies in estimating emission reductions based on current information. This</p>

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	<p>Section 4.3) are approximately 54 tons of NOx.”</p> <p>Thank you for providing additional information related to the methodologies and assumptions related to key cost/benefits calculations.</p>	<p>estimation process was also utilized when estimating the category of locomotives, airport equipment, and forklifts.</p>
3	<p>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 NOx, 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 NOx reducing potential.</p>	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
3	<p>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.</p>	<p>Thank you for your comment. OEMR is advising DEQ to focus on attempting to reduce range anxiety for potential electric car owners as the first priority with the light-duty ZEV charging infrastructure money. To reduce range anxiety, OEMR believes it is best to add charging infrastructure along highway corridors in Idaho.</p>
3	<p>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 NOx 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 NOx 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. 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.</p>	<p>Thank you for your comment, and for the offer of assistance in evaluating the AFLEET model. DEQ is currently evaluating several emissions tools, including EPA’s Diesel Emission Quantifier, DOE’s AFLEET model (including the heavy and mediums-duty emissions calculator), and the Eastern Research Group’s Diesel Funding Optimizer, a modeling application contracted by the EPA.</p> <p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to a</p>

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		formal project application period.
4	<p>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.</p> <p>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.</p>	DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.
5	NGV America agrees that barring special circumstances, the priority should be on funding projects that deliver greatest NOx reductions for the least cost, as Idaho shows in its evaluation criteria for VW projects. Consistent with this principle, the Idaho DEQ should find that projects involving on- and off-road medium- and heavy-duty natural gas vehicles (both CNG and LNG) are proven to reduce more NOx than their diesel counterparts (see attached NGVA VW Flyer), while not requiring any aftertreatment equipment on the vehicles.	DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.
5	The latest natural gas engines are the only zero emission equivalent or near zero engines that are certified to perform at 0.02 g/bhp-hr of nitrogen oxide (NOx) emissions or better and should not be confused with diesel engines certified to the 2010 EPA standard of 0.2 g/bhp-hr NOx standard. ¹ The 0.02 g/bhp-hr NOx standard requires that new engines outperform the federal standard by 90 percent and is the cleanest heavy-duty engine standard today. It also is the lowest level currently recognized under California's Optional Low-NOx Standard (OLNS) for engines.	DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral

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	<p>Additionally, if renewable natural gas (RNG) is used to produce CNG or LNG, life cycle greenhouse gas emissions from NGVs are reduced further. Using RNG also creates a market for energy produced from waste water treatment, landfills, animal waste and other methane sources, significantly increasing air quality by reducing the amount of methane released.</p> <p>As was shown in our comments submitted May 9, 2017 (attached), in some duty cycles often even new diesel engines do not perform at the EPA standard for NOx reduction when operating at low speeds or idling, which is much of the operating time for many heavy duty vehicles (especially refuse trucks, transit and school buses, and drayage trucks in ports and loading areas). NGVAmerica strongly encourages the Idaho DEQ to use different types of alternative fuel applications and technologies that will reduce the most NOx for the funds expended as shown in the attached 2017 NGVA Comment Letter and NGVA VW Flyer.</p>	<p>approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
5	<p>The Idaho Volkswagen Beneficiary Mitigation Plan (Plan) does reflect the goals of the Trust and provides categories with percentages of total funding that will reduce significant NOx emissions. Besides Idaho's Plan goal of maximizing the amount of diesel emissions reduced each year per dollar spent, NGVAmerica applauds Idaho's focus on promoting widespread acceptance of alternative fuel vehicles (AFVs). To this point, NGVAmerica suggests that Idaho consider the approach that Colorado has taken to minimize any VW funds spend on diesel projects.</p>	<p>DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
5	<p>In reviewing Idaho's project evaluation criteria, NGVAmerica suggests adding an evaluation criteria segment for projects that promote the widespread growth of AFVs by providing partnerships that will fund infrastructure for nonelectric AFVs. Additionally, projects in attainment areas that provide connecting stations between non-attainment areas (creating AFV corridors) should be viewed favorably.</p>	<p>DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
5	<p>In our January 5, 2018 comments NGVAmerica recommended the use of the new (August 2017) Argonne National Laboratory's AFLEET tool should be used to calculate vehicle / fuel type emissions since this tool has recently been updated to include current data on all vehicles and fuels including in-use emissions data (<i>other tools such as the EPA DEQ are not using current emissions and cost data</i>). The AFLEET Tool 2017 updates include:</p> <ul style="list-style-type: none"> ▪ Added low-NOx engine option for CNG and LNG heavy-duty vehicles ▪ Added diesel in-use emissions multiplier sensitivity case ▪ Added Idle Reduction Calculator to estimate the idling petroleum use, emissions, and costs for light-duty and heavy-duty vehicles 	<p>The emission reductions included in the BMP are only estimates based on generic projects.</p> <p>DEQ is currently evaluating several emissions tools, including EPA's Diesel Emission Quantifier, DOE's AFLEET model (including the heavy and mediums-duty emissions calculator), and the Eastern Research Group's Diesel Funding Optimizer, a modeling application contracted by the EPA.</p>

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	<ul style="list-style-type: none"> ▪ Added well-to-pump air pollutants and vehicle cycle petroleum use, GHGs, and air pollutants ▪ Added more renewable fuel options ▪ AFLEET Tool spreadsheet and user manual at: http://greet.es.anl.gov/afleet_tool and tool link is: http://www.afdc.energy.gov/tools <p>ANL has also just released a new VW heavy-duty vehicle emissions calculator (HDVEC) to provide state officials and fleet managers with an accurate tool to gauge emissions reductions across various medium- and heavy-duty vehicle project options affiliated with the Volkswagen Environmental Mitigation Trust Settlement. The HDVEC tool is available at: http://afleet-web.es.anl.gov/hdv-emissions-calculator/.</p> <p>In using either the AFLEET or HDVEC tools, the options for the NGV low-NOx engine, renewable fuels, and the in-use diesel factors should be used to gain the full advantage of the current data that produces more accurate estimations.</p>	<p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to a formal project application period.</p>
5	<p>Lastly, Idaho has not stated in their Plan the percents of funding planned for use by type of vehicle. NGV America strongly recommends that Idaho strive to achieve “parity” between fuels by following a model similar to Colorado’s Plan where all alternative fuels are funded at 40% of the vehicle cost for government and public entities, while private vehicles are funded at 25% of the vehicle cost (not the 75% allowed for EVs because that would use the funds for a smaller number of vehicles (reducing less NOx) and there are other sources for EV funding).</p>	<p>Additional detail with regard to the methods of project evaluation and award notification, including percentage of funding allowed as a percentage of the maximum funding eligible under the trust, will be provided in a Project Application Package to be released prior to a formal project application period.</p>
5	<p>Summary of NGV America’s Recommendations for EMT Funding</p> <ul style="list-style-type: none"> ✓ Given that the EMT was created because of NOx pollution associated with non-compliant diesel vehicles, we believe that the funding should be set aside for clean, alternative fuel vehicle projects that focus on maximizing NOx reduction for the funds spent ✓ Provide a larger incentive and greater overall funding for medium- and heavy-duty engines that deliver greater NOx reductions than currently required for new vehicles and engines ✓ Target funding for technologies that have demonstrated the ability to deliver actual lower in-use emissions when operated in real-world conditions ✓ Provide the highest level of funding to applications that produce the largest share of NOx emissions (in most regions this means prioritizing for short-haul, regional-haul and refuse trucks) ✓ Prioritize funding for commercially available products that are ready for use ✓ Prioritize funding for clean vehicles rather than fueling infrastructure ✓ Scale funding to incentivize the cleanest engines available – at a minimum, provide parity among 	<p>Thank you for your comments, and this summary of NGV America’s comments and recommendations. Please see responses in the lines above.</p>

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	<p>alternative fuels by following a version of the Colorado VW Plan that funds non-diesel alternative vehicles in the private sector at 25% of the cost of the vehicle and public sector vehicles at 40%</p> <ul style="list-style-type: none"> ✓ Ensure that funding incentivizes adoption by both public and private fleets ✓ Prioritize projects that include partnerships that provide a match such as a CNG or LNG station being built in locations that will receive the VW funding ✓ Accelerate the funding in the early years to maximize the NOx reduction benefits ✓ Use vehicles emissions measurement tools that reflect current technologies and performance under real world operation duty cycles – Argonne National Laboratory’s AFLEET and HDVEC tools are the most current tools available <p>NGV America and its members are eager to serve as a resource to assist the Idaho DEQ in its finalization of the state’s proposed Beneficiary Mitigation Plan. We strongly encourage the state to recognize the unmatched role that natural gas vehicles can play in delivering NOx emissions reductions required by the settlement and Trust.</p>	
6	<p>The VW Settlement provides an opportunity for UPS and other carriers to make an investment in alternative fuel technologies because the funds will help drive down the cost differential for the equipment. While equipment prices have come down some, natural gas and electric vehicles are sometimes two or three times the cost of a gasoline or diesel vehicle. This is why the VW Settlement funds will provide much needed incentives to those wishing to switch to a cleaner burning vehicle.</p> <p>UPS recommendations on Idaho’s VW Settlement Mitigation Plan:</p> <p>Recommendation #1: Funding for government entities should be the same as those for non-government entities.</p> <p>UPS believes that states can have a bigger impact, dollar for dollar, by deploying as many low emitting vehicles on the road as possible. If government entities use all of the funds, the impact will be muted as opposed to allowing more cost-share with private entities and maximizing vehicles deployed.</p>	<p>Additional detail with regard to the methods of project evaluation and award notification, including percentage of funding allowed as a percentage of the maximum funding eligible under the trust, will be provided in a Project Application Package to be released prior to a formal project application period.</p>
6	<p>Recommendation #2: While the VW Settlement states electric vehicles can receive up to 75% reimbursement and 25% for natural gas, that doesn’t mean it can’t be negotiated.</p> <p>UPS and other carriers who can make a large impact on air quality and have the capital to deploy large quantities of vehicles should have the ability to negotiate with the State of Idaho on an arrangement that benefits the state and the private companies wishing to make the investment. For example, a company that wants to deploy both natural gas vehicles and electric vehicles could negotiate with the state for 50% reimbursement on electric vehicles and a 20% reimbursement for natural gas or some other variation. This would allow for the state to fund large scale projects while preserving money for other smaller projects. This would also be more manageable than providing a generic number and being held</p>	<p>Additional detail with regard to the methods of project evaluation and award notification, including percentage of funding allowed as a percentage of the maximum funding eligible under the trust, will be provided in a Project Application Package to be released prior to a formal project application period.</p>

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	to it for all projects. Projects that have the biggest impact and reduce the most of amount of NOx, per dollar spent, should get the largest amount of funding.	
6	<p>Recommendation #3: Entities who have experience with alternative fuel vehicles should be given first priority for funding.</p> <p>Entities who already have deployed alternative fuel vehicles such as natural gas and electric vehicles understand how to maximize their efficiency. Many have also worked out the issues with bringing online a new fleet of vehicles. In addition, many of these entities already have the infrastructure in place making those “shovel ready” projects which can be executed more quickly over those entities who are non-experienced.</p>	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. Applicant experience is one of the evaluation criteria in Table 1, the Project Evaluation Matrix.</p>
7	<p>Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots’ smart charging solutions are built around an open standards--based focus on future--proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.</p> <p>Greenlots is strongly supportive of DEQ’s proposed investment of the full 15% allowable for light--duty EV charging infrastructure. This investment is critical to supporting EV adoption across Idaho. Maximizing investment in light--duty EV charging infrastructure complements other State initiatives, including the objectives of the Regional Electric Vehicle Plan for the West (REV West). The deployment of public charging stations can help indirectly incentivize the purchase and use of other zero emission vehicles. From a NOx reduction standpoint, light--duty vehicles are the most effective emissions segment to address with Environmental Mitigation Trust funds in terms of dollars spent per pound of NOx emission reductions. The 15% light--duty EVSE investment represents a critical step toward enabling long--term emissions reductions of NOx and greenhouse gases.</p> <p>Although there are many worthy uses of Trust funds, Greenlots agrees that DEQ can generate the greatest impact by developing light--duty DC fast charging corridors, which can connect with the other REV West states and build out the State’s designated alternative fuel highway corridors. Greenlots suggests that a secondary priority could be to install charging at destinations throughout the state (e.g., national parks, ski resorts) to further facilitate intrastate EV driving and tourism. The corridor chargers need to be DC fast chargers, to meet the needs of EV drivers who need to charge on the go, rather than were the car is parked for more than an hour or two. Level 2 charging will be important for locations with long--dwell times, such as at destination locations, workplaces, or fleet charging.</p>	<p>Thank you for your comments. OEMR hopes to strategically place fast-charging infrastructure throughout the state in order to decrease range anxiety. With the limited funds from the Trust, OEMR is prioritizing projects along Idaho’s major travel corridors, which will include areas of interest across the state.</p>
7	<p>Greenlots encourages DEQ to devote the remaining 85% of Mitigation Trust funds toward electrification of the heavy--duty sector, particularly school and transit buses. Some of the many</p>	<p>DEQ will award projects through an evaluation of project submissions received against the Project</p>

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	<p>benefits of heavy-duty transportation electrification include: reduced operating costs from fuel and maintenance; increased vehicle longevity resulting from the electric motor; reduction of criteria air pollutants; health benefits for workers, passengers/schoolchildren, and community members; and reduction of greenhouse gases.1 By investing in transit and school bus electrification, Idaho would be providing direct benefits to populations that may not directly benefit from home EV charging; heavy-duty charging provides both direct and indirect public health and social welfare benefits for transportation users and many surrounding communities—many of which tend to bear a disproportionate share of pollution (e.g., NOx, SOx, PM).</p>	<p>Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
7	<p>It will be important for DEQ to outline a transformative strategy in the Volkswagen Beneficiary Mitigation Plan that leads to long-term emissions reductions—this objective can only be achieved with wide-scale transportation electrification. DEQ should use a comprehensive approach to calculating cost effectiveness, that incorporates reduced fuel and maintenance costs from the electric engine, public health benefits, and emissions reductions benefits, over the lifetime of the vehicles and infrastructure.</p>	<p>Additional detail with regard to the methods and inputs used to evaluate project cost effectiveness, as well as applicants instructions for submitting project proposals will be provided in a Project Application Package to be released prior to the solicitation of project applications.</p>
8	<p>Pocatello’s air quality has long been abused by various entities, including transportation emissions from diesel smoke from the UPRR and numerous other sources, including vehicle traffic. Bannock county ranks as the number 3 in terms of NOx emissions from diesel and #2 for locomotive diesel emissions. This can cause serious problems for 1000s of residents who depend upon clean air for normal day to day activities, including our children.</p> <p>We propose a purchase of hybrid or Electric transit buses as well as the opportunity to enhance the infrastructure needed to promote their use. These include charging station infrastructure and required.</p>	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
8	<p>Also, the link http://www.deq.idaho.gov/vw-settlement%23Proposal does not work. Can IDEQ please fix this link?</p>	<p>DEQ has examined all links currently available on our website, however, have not found one to not be working. It’s possible that this is the link initially associated with project idea submissions. If so, this link was disabled due to technical difficulties. Please refer to the current website (www.deq.idaho.gov/vw-settlement) for all currently active VW-related websites.</p>
8	<p>Also, I do not think that Franklin County should be eligible for emission relief due to NOx emissions that IDEQ admits originate from Utah. IDEQ should pursue administrative if not legal relief from the state of Utah for its contribution to poor air quality in Franklin County or Utah should use its Trust</p>	<p>DEQ has identified areas currently designated as nonattainment to be high priority areas for emission reduction programs. A portion of Franklin County</p>

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	Funds to reduce NOx in Northern Utah and Franklin County.	<p>is currently designated as nonattainment, and therefore remains a high priority area.</p> <p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
9	Please use the VW funds to invest in zero emission technologies, such as infrastructure that supports electric vehicles. This technology will result cleaner air, healthier communities, transportation cost savings for vehicle owners, and will strengthen our state's economy by keeping transportation dollars in state.	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>
10	I am writing to ask that you please use the funds received from Volkswagen to advance the electrification of Idaho's transportation system. We need to make sure that Idaho receives the numerous benefits that electric vehicles provide, including cleaner air, lower fuel & maintenance costs, increased transportation fuel dollars spent in Idaho, and a cleaner environment.	<p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p> <p>The Trust allows Idaho to set aside 15% of the state's allocation (approximately \$2.83 million) for light-duty ZEV supply equipment. Idaho DEQ has committed to setting aside this full 15% which will allow Idaho to benefit from the electrification of</p>

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		Idaho's transportation corridors.
11	I would prefer the money go into a trust fund with the interest being used in the future to establish charging stations for electric vehicles at all major towns in Idaho.	This is not supported by the Environmental Mitigation Trust.
12	<p>131 Form E-Mail Submissions</p> <p>Dear Department of Environmental Quality Officials,</p> <p>As an Idahoan, I know the importance of our clean air and healthy, active communities communities. To ensure these amazing qualities are preserved well into the future, we have to ensure that Idaho rapidly electrifies our transportation system. I want to urge the DEQ to use the Beneficiary Mitigation Plan to advance the adoption of electric vehicle technologies in the state of Idaho.</p> <p>I fully support the allocation of 15 percent on building a DC fast charging infrastructure to enable long-distance electric vehicle travel and connect Idaho's electric transportation corridors to others states advancing similar networks. Thank you for making this investment a priority!</p> <p>With the remaining funds, I would like to see the DEQ define a fuel preference for electricity. Not only do electric vehicles provide the most significant emission reductions over the lifetime of the technology, they also provide the unique opportunity for project beneficiaries to experience reduced operation, maintenance and fuel costs over the lifetime of the vehicle. The experience beneficiaries will gain with new electric vehicles and the massive cost savings realize over time will allow the project beneficiaries to make recurring investments in clean transportation technologies well beyond the timeline of the VW Settlement Funds. This opportunity will provide the largest and longest lasting impact from emission reductions and the transformation of our transportation system. Please consider including this electric fuel preference in each of the project categories like the Plan has already done for airport vehicles.</p>	<p>Please Note: Some of the form e-mail submissions contained additional anecdotal and/or detailed comments which are not included here. For the complete submissions, please see the PDF'd submission on our website, http://www.deq.idaho.gov/vw-settlement.</p> <p>Thank you for your comment; as stated in BMP Section 3, one of DEQ's high level goals in its strategy for implementing the trust is to, "Promote widespread acceptance of electric, hybrid, and alternate fuel vehicles(e.g. zero emission and near-zero emission vehicles and engines)".</p> <p>DEQ will award projects through an evaluation of project submissions received against the Project Evaluation Matrix; overall points received for each project will then be compared to other projects received during a formal application period. DEQ has decided to take a technology/vehicle neutral approach to project funding, rather than prioritize any single technology or any one type of vehicle.</p>

Changes to the *State of Idaho Volkswagen Beneficiary Mitigation Plan* resulting from submitted comments have been incorporated into the Final BMP.