

October 17, 2013

Chairperson Mary Nichols and Board
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Re: ZEV Program and Heavy-Duty Vehicles

Dear Chairperson Nichols and Board,

Proterra Inc respectfully requests that the California Air Resources Board (ARB) consider modifications to the Zero Emission Vehicle Regulation (ZEV program) to apply to medium- and heavy-duty vehicles over 14,000 pounds, as large vehicles contribute the majority of on-road, cancer-causing, toxic diesel particulate pollution and associated exposures affecting communities in our state.

Proterra Inc is the leading U.S. manufacturer of zero-emission commercial transit solutions and makes the world's first all-electric fast-charge public transit bus, the EcoRide™. Our buses are in service in both northern and southern California and throughout the country. In May 2013, Proterra's EcoRide™ transit bus became eligible for HVIP funding. Operators can drive approximately 30+ miles between charges, charge along their routes in under 10 minutes by utilizing automated roof top charging and then continue on their routes, charging as needed. The EcoRide™ achieves 22+ miles per gallon diesel equivalent performance, 500%+ better than diesel, hybrid and CNG buses. In addition, this advanced technology avoids mobile smog-causing emissions from diesel and CNG buses, and it reduces carbon emissions by 70% or more compared to CNG or diesel buses.

We strongly support the goals of the ZEV program and applaud programs that provide needed economic incentives to help achieve California's health-based air quality standards and aggressive greenhouse gas emission goals. Currently, the ZEV program does not apply to medium- and heavy-duty vehicles over 14,000 pounds. Large vehicles are main contributors of diesel particulate pollution, NOx, and other smog precursors that harm the health of Californians. Refining the ZEV program to include zero-emission vehicles over 14,000 pounds would achieve the greatest tons per dollar reductions associated with the program and accelerate the program's health benefits.

Allowing auto manufactures to purchase ZEV credits from manufacturers of larger ZEVs and allowing these credits to fulfill light-duty manufacturers' ZEV requirements will provide a substantial net air quality benefit. As a result of the sustained regulatory efforts by ARB and the US EPA, new light duty cars are now very clean for criteria pollutants – NOx and PM emissions from new light-duty cars sold in California are now largely

controlled. While California's diesel fleet is also getting cleaner, existing vehicles over 14,000 pounds, which typically stay in use longer than light-duty vehicles, are still relatively dirty. Allowing the ZEV program to include larger vehicles will leverage private dollars to help modernize the fleet and eliminate toxic diesel emissions, thus cleaning the air and alleviating toxic exposures.

In our current economic climate, it is more important than ever to tailor policies to achieve the greatest reduction of toxic diesel particulates as well as NOx and GHG emissions per dollar invested. To support the expanded development of California ZEV technologies, we ask that zero emission, heavy-duty vehicles be allotted credit under the ZEV Program to help provide market-based incentives to accelerate the replacement of large, dirty diesel vehicles.

We thank you for the opportunity to provide comments on the Zero Emission Vehicle (ZEV) Program and appreciate the efforts of the ARB to reduce GHG and health-based air pollutants.

Sincerely,



Eric McCarthy
Proterra Inc