



December 9, 2019

Chair Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Proposed Advanced Clean Trucks Regulation

Dear Chair Nichols and Members of the Board:

ROUSH CleanTech¹ appreciates the opportunity to comment on the proposed Advanced Clean Trucks (ACT) regulation by the California Air Resources Board. Our company understands the urgent need to reduce greenhouse gas (GHG) and NOx emissions in the transportation sector. We also empathize with the complex nature of finding solutions that balance stakeholder needs that are diverse and sometimes even in opposition. Because ROUSH CleanTech has a unique and rich history in the automotive engineering industry in addition to decades of experience innovating in the advanced clean transportation industry, we hope to support the development of meaningful and cost-effective solutions to the problems aforementioned.

ROUSH believes development and widespread adoption of zero-emission and battery-electric technology is an important strategy. We also believe that near-zero (e.g., engines that meet the 0.02 g/bhp-hr NOx levels) technologies are an overlooked and important pathway to achieving the goals outlined in the proposed ACT Regulation. The use of renewable propane, for example, in near-zero propane trucks significantly reduces carbon emissions and NOx emissions that remain to be an important focus in many areas of California. Furthermore, near-zero propane technology is the most cost-effective and versatile replacement to diesel currently available.

With over 20,000 advanced clean technology vehicles on the road and thousands of individual customers, ROUSH has a depth of experience assisting fleets with the deployment and growth of their clean transportation programs. ROUSH customers in California specifically represent the following industries: airports, energy, telecommunication, para-transit, food and beverage, government, agriculture, construction, entertainment, manufacturing and schools amongst others. All are potential candidates for renewable propane that can be transitioned immediately should the appropriate market signals be in place.

¹ ROUSH CleanTech focuses on innovations in the advanced clean transportation industry. Bringing almost 50 years of automotive expertise to the mobility marketplace, ROUSH CleanTech's portfolio of transportation energy solutions includes near-zero propane and natural gas and zero-emission electric propulsion systems for school buses, commercial trucks and transit buses. Development capabilities also include connected, autonomous and fuel cell electric vehicle engineering solutions and fleet management software.



While our company continues to work and invest aggressively on the development of zero-emission vehicles and technology in California, we would appreciate the opportunity to help accelerate carbon and criteria pollutant emission reduction goals through use of near-zero gaseous fuel technology paired with renewable fuel use as well.

Thank you again for your time, partnership and leadership.

Sincerely,

A handwritten signature in black ink that reads "Todd A. Mouw". The signature is written in a cursive style.

Todd Mouw
President
ROUSH CleanTech