



February 18, 2019  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Zero-Emission Airport Shuttle Regulation**

Dear Chair Nichols and Members of the California Air Resources Board,

We appreciate the opportunity to provide comments on the proposed Zero-Emission Airport Regulation. We strongly support adoption and implementation of a robust rule and applaud the actions of the California Air Resources Board to meet California's important air quality goals and the state's leadership to address climate change. We further support efforts to deploy zero-emission vehicles that are accessible to all Californians and that eliminate toxic emissions and associated exposures from diesel and conventional natural gas buses.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus with models that feature on-route, fast-charge technology offering functionally unlimited range, as well as extended range models that can travel up to 390 miles on a single charge. The Proterra Catalyst® bus achieves up to 29 MPGe, more than 500% better than diesel and CNG buses, and has a lower total cost of ownership due to more simplified maintenance needs and lower operating costs. With no tailpipe emitting toxic diesel particulate matter, the Proterra Catalyst eliminates approximately 229,000 pounds of greenhouse gas emissions each year, and can save more than 2.5 million pounds of carbon emissions over the lifetime of the vehicle. Proterra also offers high power charging systems with a range of power levels that can easily scale as more battery-electric vehicles are added to a fleet, utilizing standardized technology that allows for interoperability.

Additionally, Proterra moved its Corporate Headquarters and battery manufacturing to Burlingame, California from the East Coast and expanded manufacturing to the City of Industry, California —allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra strongly supports the proposed Zero-Emission Airport Regulation. The proposed rule is a balanced approach that will allow airports sufficient time to plan and procure zero-emission shuttle buses, while promoting the development and use of zero-emission airport ground transportation to reduce emissions. It should be noted that two forward thinking airports, San Jose and Sacramento, have already purchased and will soon launch zero-emission shuttle buses made in California by Proterra. We are thankful to ARB staff who have overseen the development of the plan and their efforts to work with many stakeholders to create a reasonable regulation.

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As a leading manufacturer of zero-emission buses, Proterra will continue to innovate and implement strategies to make battery-electric buses the most cost competitive and fuel-efficient choice for our customers, including airports, and improve our technology to make battery-electric transit options the number one choice of fleet operators, bus drivers, maintenance staff, and public riders alike. Since 2010, Proterra has decreased the up-front cost of battery-electric transit buses by approximately 41% (from \$1.2M to \$700K) and increased range by approximately 800% (from a nominal range of 30-50 miles to 250-350 miles). To remain competitive both in California and throughout the United States, we will continue to drive down costs and improve our technology to accelerate the deployment of zero-emission buses in California and beyond. We also strongly support continued funding of incentive programs such as HVIP. These programs are essential in support of the transition to 100% zero-emission.

Thank you for the opportunity to provide comments and we look forward to working with ARB and other stakeholders during implementation.

Sincerely,

*Kent Leacock*

Kent Leacock

Sr. Director Government Relations & Public Policy  
Proterra Inc.