



May 21, 2018

California Air Resources Board  
1001 I Street  
Sacramento, CA 95815

RE: Volkswagen Settlement – Environmental Mitigation Trust for California

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide comments on ARB's discussion document and development of a Beneficiary Mitigation Plan as part of the Volkswagen Settlement Appendix D: Environmental Mitigation Trust (EMT). Proterra appreciates and supports the strong investment for zero-emission transit, school, and shuttle buses to mitigate hazardous NOx and other criteria pollutants.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel up to 350 miles on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions. Proterra moved our Corporate Headquarters 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 allocating funding for zero-emission transit, school, and shuttle buses, including up to \$180,000 for new transit buses, \$400,000 for electric school buses, and \$160,000 for shuttle buses. These projects will deliver multiple environmental and economic benefits to California, including meeting the NOx mitigation requirements and improving air quality in California's disadvantaged communities. Zero-emission public transportation increases ZEV access and exposure, as well as manufacturing and design jobs throughout the state. Our mobility solutions provide an effective opportunity for all commuters to ride an electric vehicle and realize the health and other associated benefits of electrification, including eliminating toxic diesel emissions.

We appreciate the proposed allocation of \$130M for zero-emission transit, school, and shuttle buses. Although, in order to recognize the significant environmental and economic benefits, including significant NOx mitigation benefits, we respectfully request utilizing a portion of the reserve funding to increase the project allocation for this category to \$170M for zero-emission transit, school, and shuttle buses. The increase in allocation from the reserve funding will help meet the growing demand for zero-emission medium- and heavy-duty on-road vehicles, as well as the NOx mitigation requirements for the EMT.

Thank you for the opportunity to provide comments on the Environmental Mitigation Trust and Beneficiary Mitigation Plan development. We look forward to continuing to work together to help carry out the goals of the Volkswagen Settlement Consent Decree and EMT.

Sincerely,

*F. Kent Leacock*

F. Kent Leacock  
Sr. Director Government Relations & Public Policy  
Proterra

[www.proterra.com](http://www.proterra.com)