



November 13, 2018

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Support for CAP-and-Trade Third Investment Plan

Dear California Air Resources Board and Staff,

The Lion Electric Co. Team appreciates the opportunity to provide comments on the Fiscal Years 2019-2022 Cap-and-Trade Investment Plan. Lion strongly supports the Cap-and-Trade program and continued efforts to spur deployment of zero-emission vehicles to reduce harmful GHG and criteria pollutant emissions.

Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission Type A and C school buses and zero-emission trucks, with deployments in California, New York, Massachusetts, and other states across the nation. Today, there are currently over 150 electric school buses in operation in North America that have been carrying kids to school every day safely for the last 3 years, with over 2.5 million miles of service provided.

With California's transportation sector representing 37 percent of GHG emissions statewide, continued investment in low carbon transportation and sustainable communities will need to be a critical component of reaching California's 2050 climate target. Lion strongly supports continued investment in the Air Resources Board's Low Carbon Transportation Programs and Heavy-Duty Vehicle and Off-Road Equipment Investments to deploy zero-emission school buses, transit buses, and trucks, including the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), the Clean Mobility in Schools Program, and the Rural School Bus Pilot Project. These programs are pivotal to accelerating widespread commercial deployment of zero-emission vehicles, which substantially reduce greenhouse gas emissions and eliminate toxic exposures disadvantaged communities throughout the state.

School buses are the largest segment of mass transit in the United States and, unfortunately, are among the oldest and dirtiest fleets on the road. School children are sensitive receptors and face elevated health risks from exposures to toxic air contaminants from diesel emissions while riding and being near California's existing fleet of dirty diesel school bus, which disproportionately expose students to toxic air contaminants and associated health risks. Additionally, transit buses and short, medium, and long-range trucking significantly contributes to GHG emission throughout the state. There is an immediate need to continue investments in low carbon transportation to accelerate the deployment of zero-emission public transit vehicles and trucks to achieve our goals and increase access to zero-emission vehicles for more Californians. Further investment for these programs will help improve California's school bus fleet composition, reduce emissions from the transportation sector, improve air quality, and help reach our 2050 climate targets.

Lion appreciates the development of the proposed the Fiscal Years 2019-2022 Cap-and-Trade Investment Plan and strongly support adoption to ensure continued funding of these important programs.





Sincerely,

Nate Baguio
Vice President of Sales

