



2929 Allen Parkway, Suite 4100, Houston, TX 77019

July 20, 2018

Tony Brazil, P.E.
Branch Chief, HD Diesel Implementation
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Innovative Clean Transit Draft Proposed Regulatory Summary

Dear Mr. Brazil:

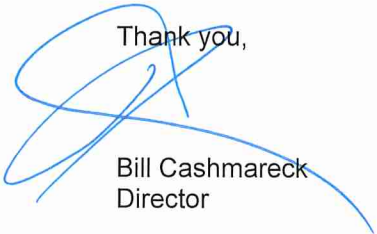
Trillium appreciates the opportunity to engage in the Innovative Clean Transit (ICT) rulemaking process. We believe the recent Draft Proposed Regulatory Summary takes the regulation in the right direction, has the potential to lower the costs of implementation, and it provides additional stakeholder flexibility. Trillium would like to recommend CARB consider alternative paths to achieving its goals besides strictly a "Zero Tailpipe" standard." The Summary document shows that you and your staff have acted on these concerns. We support a clean transit future, including zero emission technologies, and we want to work with you to ensure the long-term success of this regulation. Along those lines, we had a few additional comments to consider:

- Zero emission buses that comply with this regulation should be required to use 100% renewable fuel, i.e. 100% renewable hydrogen or 100% renewable electricity. We applaud the requirements on diesel engines to use renewable diesel, and on natural gas engines to use renewable natural gas; zero emission vehicles should be held to the same standard.
- Trillium recommends staff continue to fund the National Renewable Energy Laboratory (NREL), Foothill Transit study¹, for the entire life of those buses. This is one of the only programs that have provided an accurate representation of the cost barriers transit agencies face when deploying battery electric buses.

Trillium welcomes the opportunity to provide CARB technical assistance and collaboratively participate in the process. Our expertise can help CARB understand the technical challenges facing CA transit agencies as they implement this regulation. Trillium is well positioned to help CARB achieve its clean air objectives by financing and building the requisite infrastructure for CA transit agencies to deploy zero and near zero emission buses.

If you have any questions please contact me directly: bill.cashmareck@trilliumcng.com

Thank you,



Bill Cashmareck
Director

¹ <https://www.nrel.gov/transportation/fleettest-electric-foothill.html>