



October 14, 2016

California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Comments in Response to Air Resource Board's Proposed Modifications to Fiscal Year 2016-2017 Funding Plan**

Dear Chairwoman Nichols:

BYD Motors (BYD) writes in response to the proposed modifications for the Fiscal Year 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program (Funding Plan). BYD thanks you and the Board for the opportunity to submit these comments.

**Heavy-Duty Vehicles and Off-Road Equipment Funding**

***Funding for Truck/Bus Solicitation***

As discussed in our previous funding plan comments to the Board submitted in June 2016, we strongly urge the Board to move additional funding into its Zero-Emission Truck & Bus Pilot Commercial Deployment Projects (Truck/Bus). The Air Resources Board's (ARB) own notice of public comment for the proposed 2016-2017 funding plan revisions acknowledges the greatly oversubscribed nature of the Truck/Bus solicitation. Such projects are 'shovel ready' and can commence immediately upon receiving funding. Compared to other existing alternatives, we believe that funding even a small additional number of Truck/Bus projects represents the quickest and most efficient pathway to further reduce GHG emissions and spur the zero emission market forward in California over the next 1-2 years. As such, we urge ARB to modify its proposed funding allocations and move additional funding into its Truck/Bus solicitation program.

***Priority for Zero Emission Technologies***

In light of receiving less than anticipated funding resources, we encourage the ARB to reevaluate its proposal to fund non-zero emission technologies. ARB should instead concentrate its reduced programmatic resources on viable, market/near-market ready, and increasingly price-competitive zero emission technologies, rather than pour millions of dollars into non-zero technologies. Doing so may have made sense in prior years, but we think that investments in non-zero emission technologies now would be a lost opportunity to further accelerate the development and market acceptance of advanced, competitive zero emission alternatives. As such, we urge the



Board to reevaluate proposed allocations to non-zero emission technologies like Low NOx technologies and instead concentrate its limited resources on zero emission technology programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Zachary Kahn", is positioned below the word "Sincerely,".

Zachary Kahn  
Director of Government Relations