December 15, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95815

Re: 2030 Target Scoping Plan Update Discussion Draft

Dear California Air Resources Board Members and Staff,

Thank you for the opportunity to provide comments on the California Air Resources Board’s 2030 Target Scoping Plan Update Discussion Draft. Proterra strongly supports the goal of reducing greenhouse gas emission levels to 40% below 1990 levels by 2030.

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 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 reducing carbon emissions by 70% or more compared to CNG or diesel buses.

Proterra recently moved our Corporate Headquarters to Burlingame California from the East Coast, and expanded manufacturing to the City of Industry California. Proterra is thankful for the partnership of ARB and the California Energy Commission for supporting manufacturing and scaled deployments to allow future zero-emission buses in California to be designed and manufactured by Californians and supported by California’s robust EV supply chains.

Transit buses have consistently been the forerunners in advancing heavy-duty transportation technology and transferring lower-emission technology throughout the heavy-duty, class-8 sectors. This technology progression has evolved from CNG buses with lower emissions to battery electric buses with zero emissions. Zero-emission transit buses provide the opportunity for everyone to ride an electric vehicle and realize the associated health and climate benefits.

We support ARB Board and staff for their goal of creating a sustainable transportation system built on zero-emission vehicles and low carbon fuels. With the transportation sector being the largest emitter of greenhouse gases statewide and a projected growth in California’s population, achieving this goal and reducing emissions will require expanded use of zero-emission vehicles in both the light and heavy-duty sectors. Policies and goals need to be set to achieve target ZEV sales in both. Additionally, we support implementation of the Advanced Clean Transit rule to further reduce criteria pollutant and GHG emissions from transit fleets, and recommend continued state investment to support future fleet transition. We strongly support continued assistance to transit agencies from programs like the Transit and Intercity Rail Capital and Low Carbon Transit Operations Program and various transit-related Low Carbon Transportation programs. These investments are
demonstrating the feasibility and reliability of heavy-duty zero-emission technologies.

Thank you for the opportunity to provide comments on the 2030 Target Scoping Plan Update Discussion Draft. We commend the Air Resources Board and look forward to continuing to work together to help California reach its climate and greenhouse gas reduction goals.

Sincerely,

F. Kent Leacock
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Director of Government Relations
Proterra, Inc.