Comment 1 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 2 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Michael
Last Name: Britt
Email Address: mbritt@ups.com
Affiliation: UPS

Subject: Letter to Chairperson
Comment:

```
This letter is for support of AB 118
```

Attachment: www.arb.ca.gov/lists/com-attach/2-aqip2013-14-B2QHYFwCBTdSPVMh.pdf

Original File Name: CA Air Resources Board72013.pdf

Date and Time Comment Was Submitted: 2013-07-16 11:05:56

4 Duplicates.

Comment 3 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 4 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Jeffrey
Last Name: Flath
Email Address: jeff.flath@enowenergy.com
Affiliation: eNow, Inc.

Subject: Comment on AQIP FY13-14 Funding Plan
Comment:

The following letter of comment is attached as a pdf:

Via electronic submittal to:

Clerk of the Board July 22, 2013
Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Proposed AB 118 Air Quality Improvement Program (AQIP) Funding Plan for Fiscal Year 2013-14

Dear Sir or Madam:

I am writing on behalf of eNow to comment on the above referenced AQIP funding plan.

eNow is a clean transportation technology company that designs, develops and manufactures solar based auxiliary power systems for vocational vehicles and light, medium and heavy duty trucks. ARB has approved of eNow's solar powered auxiliary power system (APS) on any heavy duty diesel-fueled vehicle with a gross vehicle weight rating over 10,000 pounds as meeting the requirements set forth in title 13, CCR section 2484 (Reference 13-643-004).

The proposed AQIP includes $3 million for Advanced Technology Demonstration Projects (ATDP). Of these funds, the staff proposal is to focus $2 million on Tier 4 emissions levels for locomotives and hybridization of marine vessels. In addition, staff has identified additional project categories that could be prioritized for funding if additional funds beyond the $3 million become available.

eNow believes that the purposes of the ATDP of accelerating the introduction emission reductions technologies into the California market place would be served by including technologies that eliminate diesel powered refrigeration on the list of priorities if additional funds are available. eNow is working with national truck manufacturers to adapt solar power for cold plate and evaporation compressor refrigeration. This technology, which is in development and not yet commercialized, would be suitable for a pilot or demonstration project. This technology could assist a number of public entities involved in moving food products, such as large

school districts in the state, which have their own food distribution system. For example, eNow is working with a company that supplies trucks to the LA Unified School District. The district has a central commissary that prepares and distributes food for the various schools. Currently trucks serving the district use refrigeration powered by diesel auxiliary power units (APUs), which emit greenhouse gases.

The school district would benefit from a solution that combines energy from solar technology with excess power generated by the alternator to eliminate the diesel APUs. Use of solar technology in lieu of diesel power for refrigeration could significantly reduce diesel fuel consumption and resulting pollutants associated with necessary refrigeration. If successful as a demonstration project, the technology would have broad application by public and private carriers that require refrigeration.

Thank you for your consideration of these comments.

Sincerely,

Jeffrey C. Flath
President and CEO

Attachment:

Original File Name: ARB Comment.pdf

Date and Time Comment Was Submitted: 2013-07-22 09:13:49

No Duplicates.

Comment 5 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Steven
Last Name: Douglas
Email Address: sdouglas@autoalliance.org
Affiliation: Alliance of Automobile Manufacturers

Subject: AQIP Funding Plan 2013-2014 - SUPPORT
Comment:

```
Attached are the comments of the Alliance of Automobile
Manufacturers in support of the proposed AQIP Funding Plan for
2013-2014.

Best regards,
Steve Douglas
```

Attachment: www.arb.ca.gov/lists/com-attach/7-aqip2013-14-AjBda1xsVDRRegU1.pdf

Original File Name: 2013-07-22 Alliance Letter of Support for CVRP.pdf

Date and Time Comment Was Submitted: 2013-07-22 15:46:48

No Duplicates.

Comment 6 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: David
Last Name: Reichmuth
Email Address: dreichmuth@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: Re: Comments on the AB118 Air Quality Improvement Program funding plan for FY13-14
Comment:

Dear Chairman Nichols and Members of the Board,
The Union of Concerned Scientists supports the efforts of the Air Resources Board to enable investment in technology advancing projects while also providing immediate emissions reductions through the Air Quality Improvement Program (AQIP). The AQIP program has been successful in stimulating the adoption of low and zero-tailpipe emission cars and trucks. The adoption of these cleaner vehicles provides direct improvements to air quality and reduces emissions and also increases consumer awareness, provides market certainty, and complements California's alternative fueling infrastructure investments.
One particularly successful AQIP program is the Clean Vehicle Rebate Program (CVRP). This program has provided incentives for over 22,000 plug-in and hydrogen electric vehicles over the last 3 years. Because of the CVRP, we now have thousands of drivers that are producing no tailpipe emissions as they drive their vehicles in California. The demand for electric vehicles is also encouraging manufacturers to increase the number of electrified vehicles available, and 12 models of plug-in vehicles are now available at California car dealerships, with more models coming soon. The incentives for larger vehicles like medium and heavy-duty trucks have also been successful, with over 1,500 hybrid and electric vehicles purchased with the help of the Hybrid and Zero Emission Truck and Bus Voucher Incentive Project.
Although the AQIP programs have been successful, there is still a continuing need for incentives at this early stage of the electric vehicle market. Ending support prematurely could slow or even reverse the positive trends in electric vehicle sales and acceptance. While state incentives are smaller in magnitude than the federal tax credit, they play an important role in the financial attractiveness of an electric vehicle purchase. A recent study by the Electric Power Research Institute shows that California incentives can significantly change the total cost of vehicle ownership and the payback period for an electric vehicle as compared to a conventional gasoline car. Because of the importance of the AQIP program and the limited funding available, UCS is making several recommendations to ensure the viability and success of AQIP.

Multi-year planning for incentive programs such as CVRP is needed

The current planning process for CVRP is on an annual basis and this process has struggled to keep pace with the rapidly changing

demand for electric vehicles. ARB staff has identified the need for a long-term plan for light-duty clean vehicle incentives. We agree with this assessment, and urge ARB to develop and adopt a multi-year plan for AQIP incentive programs.
In order to have a stable CVRP program, the total program cost will need to match allocated program funding. The most straightforward approach would be to have volumetric targets for clean vehicle sales and incentives that are lowered as the targets are met. This approach would help level the costs of the CVRP program, as increased CVRP demand would lower the rebate amount. Setting long-term targets and coordinating reductions in incentive amounts would give certainty to buyers and sellers of electric vehicles. This approach is similar to other successful incentive programs, such as the California Solar Initiative.
Increasing CVRP funding to support current rebate levels is the best option

The funding of incentives at the current levels for the next fiscal year is the best way to ensure continued progress of the EV market in California. Additional funding will be required beyond the CVRP allocation and likely above the total AQIP funding level. Incentives are very important to payback period at current vehicle prices, so every effort should be made to find funding for CVRP at the current rebate levels of $2500 and $1500 for BEVs and PHEVs respectively. Based on current sales rates, this option would require $40-$60 million dollars for FY13-14, requiring up to $45 million additional funds over the $15 million currently allocated.

If additional funding is not secured, the CVRP rebate amounts should be reduced in future years.

If additional funding is not identified, UCS recommends decreasing the rebate amounts to a level that would allow the program to be functional for the full fiscal year. By decreasing the amount, the CVRP program will increase the number of rebates that can be given out and a larger number of purchasers will receive a clean vehicle incentive. Having the CRVP program operational for 12 months will allow all electric vehicle manufacturers and buyers to receive assistance, regardless of the time of year when the sale takes place. Without this change, new models that are introduced in the late fall and spring will not be supported by the CVRP incentives. The CVRP program has used $28M and given over 14,000 rebates during the 2012-2013 fiscal year (through May), and is currently receiving rebate applications at a rate of $1 million per week. If electric vehicle adoption is assumed to grow in FY13-14, ARB should conservatively plan for 25,000 CVRP applications during the year. At a funding rate of $15M per year, the average rebate would have to be reduced to an average amount of $600. If however CVRP was funded at a rate of $30 million per year, similar to this year, the average rebate could be set at $1,200.

Other recommendations for program improvements:

A. ARB should consider allocating funds for additional outreach in areas that currently have low existing CVRP participation rates. The current CVRP statistics show that there are areas of California that are underrepresented in the program. The addition of local incentives, like the additional credit in the San Joaquin Valley, is a useful policy. However, ARB should investigate opportunities to increase awareness of the CVRP program through outreach efforts, targeted in areas that have historically low CVRP participation

rates, either by air quality district or by ZIP code. Outreach could be directly targeted to consumers or to the automotive dealerships to publicize CVRP incentive availability.

B. ARB should consider providing vouchers or pre-purchase applications, instead of post-purchase rebates. If program funds are insufficient and there is not a wait list (as is currently planned), the current post-purchase rebate program could result in disappointed consumers and reduce consumer interest and acceptance of EVs and clean vehicle programs.
In addition, a pre-purchase application process could allow ARB to have multiple rebate levels (depending on vehicle model, applicant's location, or other factors). There has been concern that increasing the number of rebate levels would be confusing to consumers. However, a pre-purchase application process would allow the program administrator to inform the consumer of the actual rebate amount prior to purchase.

C. ARB should incorporate a separate class of CVRP support for fuel cell electric vehicles. Fuel cell electric vehicles are a critical part of California's long-term air quality and emissions goals. This technology should receive similar support as the initial plug-in electric vehicles incentives ($5,000). A higher level of support is warranted, as the initial fuel cell electric vehicles will likely have higher purchase prices (as compared to conventional cars). Based on manufacturers' stated production plans, few fuel cell electric vehicles will apply for FY13-14 CVRP funds, and so this provision would have minimal impact on the short-term financial viability of CVRP. However, setting a higher rebate amount now will signal ARB's support for future fuel cell electric incentives to vehicle manufacturers and early adopters of fuel cell vehicles.

D. ARB should evaluate options for increasing electric vehicle purchases by car sharing and rental car operations in California to increase consumer access to the technology. Car sharing programs can create consumer awareness without a large financial commitment from the consumer, and increasing the number of drivers who have experience with an electric vehicle can help build market acceptance for plug-in vehicles. Rental and sharing programs can also help expand the electric vehicle experience beyond new car buyers.

Conclusion

ARB has developed successful programs that are improving air quality and reducing emissions through the support of cleaner vehicles. Programs like the CVRP are still needed to incentivize the transition to cleaner transportation options. In order to continue the effectiveness of these programs, ARB needs to make long-term plans for these programs. A key component of these plans should include a defined transition to lower incentive levels as cleaner technologies become less expensive and widely adopted.

David Reichmuth
Senior Engineer, Clean Vehicles Program
Union of Concerned Scientists

Don Anair
Deputy Director, Clean Vehicles Program
Union of Concerned Scientists

Attachment: www.arb.ca.gov/lists/com-attach/9-aqip2013-14-AjABN1ZmVDQAWQg4.pdf

Original File Name: 2013_07_22 AQIP comments.pdf

Date and Time Comment Was Submitted: 2013-07-23 23:54:54

No Duplicates.

Comment 7 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 8 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Richard
Last Name: Walker
Email Address: info@zeromotorcycles.com
Affiliation:

Subject: Support for AQIP2013-14 Program
Comment:

```
Please see attached file for our support letter.
Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/12-aqip2013-14-AWBRJgZuBSZSZgU1.pdf

Original File Name: AQIP2013-14-ZeroSupportLetter-0724713.pdf

Date and Time Comment Was Submitted: 2013-07-24 10:20:42

No Duplicates.

Comment 9 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Daniel
Last Name: Davids
Email Address: info@pluginamerica.org
Affiliation: Plug In America

Subject: Support for FY 2013-14 AQIP Funding Plan
Comment:

```
Please see the attached letter.
Thank you!
```

Attachment: www.arb.ca.gov/lists/com-attach/13-aqip2013-14-UTACdVY+AyALIAMx.pdf

Original File Name: AQIP-2013-14-PIA_Support-072413.pdf

Date and Time Comment Was Submitted: 2013-07-24 10:23:44

No Duplicates.

Comment 10 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Jamie
Last Name: Hall
Email Address: jhall@calstart.org
Affiliation: CALSTART

Subject: CALSTART Comments on CVRP and HVIP funding in AQIP Plan
Comment:

See attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/14-aqip2013-14-WjBRIlc6VX8BWFBi.pdf

Original File Name: July 25 ARB Board Meeting Comments - CALSTART.pdf

Date and Time Comment Was Submitted: 2013-07-24 10:37:18

No Duplicates.

Comment 11 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Frank
Last Name: Breust
Email Address: frank.breust@bmwna.com
Affiliation: BMW Group

Subject: Proposed AB 118 Funding Plan FY2013/14
Comment:

```
Support for CVRP proposal.
```

Attachment: www.arb.ca.gov/lists/com-attach/15-aqip2013-14-WzlQO1AmVWUAcFQm.pdf

Original File Name: BMWCVRP.pdf

Date and Time Comment Was Submitted: 2013-07-24 10:39:10

No Duplicates.

Comment 12 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Raoul
Last Name: Renaud
Email Address: alcalira51@gmail.com
Affiliation:

Subject: Clean Vehicle Rebate Project Eligibility - 24 month leases
Comment:

I am addressing you regarding this agenda item because AQIP funds are the source of the CVRP rebates. The CVRP Implementation Manual has been mis-interpreted by the California Center for Sustainable Energy (CCSE), which administers the CVRP for ARB, denying many Californians the opportunity to participate in the CVRP and drive electric vehicles.

In June, 2013 I applied for the CVRP $2500 rebate on my second battery electric vehicle, a 2013 Nissan LEAF. The CCSE denied my application on the ground that a 36-month or longer lease term is required. This is a mis-interpretation of ARB's duly adopted regulations. My lease is for 24 months. Neither the CCSE nor ARB have responded to my request for the source of the 36 month lease term requirement.

According to the materials on the CCSE website, the CVRP is governed by the ARB Implementation Manual. I have studied that manual carefully. While it clearly requires that rebate recipients keep the car for at least 36 months, nowhere does it say that the term of a lease must be at least 36 months. The Manual does contain provisions whereby ARB can access DMV records to check that participants have not violated the 36-month requirement, regardless of how they financed the car.

Incidentally, a 2009 DRAFT of the Implementation Manual clearly did require that lease terms be 36 months or longer. That language does not appear in any adopted version of the Manual, including the newly-adopted Fiscal Year 2013-2014 version.

Like many people who lease cars, I am only using that 24-month lease as a financing tool; the interest rate and the down payment on that lease were the best deal available at the time due to a special program offered by Nissan, making it the most economical way to acquire the car.

At the end of the 24 months I will either buy the car for the predetermined price of $21,000 or extend the lease for another year. This is a very common way to buy a car. For example, my family just purchased from Toyota Lease Trust the 2010 Toyota Prius that we had leased for the past 3 years, under the right-to-purchase option of the lease.

A participant who finances a car with a loan is under no obligation with the finance company to keep the car for any particular term. The borrower could sell or trade in the car, and pay off the loan,

at any time. Similarly, a participant who buys the car outright could easily sell the car before 36 months is up.

It therefore is neither fair nor legally correct to single out lessees with the additional requirement that their lease term be 36 months or more. One who leases a car for 36 months can still terminate that lease early. And one who leases for 24 months can buy the car at the end or extend the lease.

I have given my promise that I will comply with the 36 month requirement. That is no different than the promise given by one who borrows money or pays cash to obtain the car. That promise is what the Implementation Manual calls for. ARB can reclaim the rebate funds from participants who do not comply.

The $2500 rebate helps put electric cars within reach of persons who might otherwise be discouraged by their high prices. Over 36 months, it amounts to about $70 a month toward the lease or loan payments. That money would make the lease payment over 36 months much more affordable for my family, or we could use the $2500 as a down payment on a conventionally-financed purchase at the end of the 24 month lease. Thus, in my case the $2500 would do exactly what ARB intended: assist in making it financially viable for participants to drive electric for at least 36 months.

I have done everything that is required under the Implementation Manual and should qualify for the rebate. If ARB wants to deny CVRP funds to applicants whose leases are for 24 months, it should say so in the Implementation Manual. Under the current, adopted version of the Manual, the length of the lease term is not a factor in determining eligibility.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-24 10:14:12

No Duplicates.

Comment 13 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Elizabeth
Last Name: Bagdazian
Email Address: liz@ppallc.com
Affiliation: CalETC

Subject: AB 118 Program Funding Plan - Support
Comment:

See Attachment

Attachment: www.arb.ca.gov/lists/com-attach/17-aqip2013-14-UjFVMlUmUmMEXQR3.pdf

Original File Name: CARB Support Letter 7-24-13.pdf

Date and Time Comment Was Submitted: 2013-07-24 11:30:29

No Duplicates.

Comment 14 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14) - Non-Reg.

First Name: Matt
Last Name: Schrap
Email Address: mschrap@crlease.com
Affiliation: Crossroads Equipment Lease and Finance

Subject: AQIP 2013-2014
Comment:

To: Chairman Mary Nichols
RE: AQIP 2013- 2014

Date: July 24, 2013

Crossroads Equipment Lease and Finance is a home grown, California based finance and leasing company based in Rancho Cucamonga. We specialize in providing commercial capital for heavy duty truck and tractor purchases. Over the past 4 years Crossroads has worked hard to help California based operators secure clean equipment ahead of regulatory requirements using an array of available programs to help offset the tremendous costs associated with heavy duty equipment upgrades. Despite the tightest commercial credit market in recent history, our participation in the Providing Loan Assistance for California Equipment (PLACE) program in the California Capital Access Program (CalCAP) has provided the opportunity for over 1000 trucking fleets in California to access affordable financing for clean equipment purchases.
To date, Crossroads has enrolled over 1135 loans into the PLACE/CalCAP program, this represents close to 40% of all on-road PLACE/CalCAP loans that have been issued since 2009. Fleets who would not have otherwise qualified for financing were able to access the needed capital for equipment purchases required by state law. If the PLACE program did not exist, it is likely that these fleets would not have been able to purchase the equipment. Because of the program, many small, minority owned businesses have been able to purchase equipment ahead of compliance schedules while simultaneously building their commercial credit history.
Small businesses in California, especially trucking companies, are the economic engines of this great state. In 2012, the treasurer's office estimates that close to 300 jobs were created and over 1,500 jobs were retained from loans enrolled into the on-road PLACE program. These jobs are a direct result of the foresight and leadership of CARB in setting up the program through the Pollution Control Finance Authority in 2009. Thousands of California families and small business owners have benefitted from the existence of PLACE, while thousands more are still facing expensive upgrade requirements under the on-road truck and bus rule at the end of this year. The PLACE program uses state support to help operators get into newer, clean equipment ahead of the deadlines. To date, it is estimated that the program has helped reduce particulate matter emissions by one ton per day and oxide of nitrogen emissions (NOx)

by 4.5 tons per day ahead of regulatory requirements under the on-road truck and bus rule.

Currently, the PLACE program is running out of money for new enrollments. It is understood that the program will be exhausted unless additional capital is allocated to bring in new loans. Although the $2 million dollars currently earmarked for the program is a needed gesture, more funds are desperately needed if the program is to continue.

Crossroads has direct understanding of the trucking industry's unmet needs; we respectively request that CARB allocate additional funding to help sustain the PLACE program to assist the thousands of small businesses who need access to financing that they cannot secure on their own. With additional enrollees, additional emissions reductions will be achieved and the California businesses that need help the most will continue to thrive and grow. Please support additional funds for PLACE, California needs it.

Sincerely,

Matt Schrap
VP Government Programs
Crossroads Equipment Lease and Finance

Attachment: www.arb.ca.gov/lists/com-attach/18-aqip2013-14-V2ACKQY1UzUHLAQ2.docx

Original File Name: 7-25-2013 AQIP Comments.docx

Date and Time Comment Was Submitted: 2013-07-24 11:29:23

No Duplicates.

Comment 1 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: Eileen
Last Name: Tutt
Email Address: Eileen@caletc.com
Affiliation: CaETC

Subject: Effective Incentives for Electric Vehicles in the California Market
Comment:

```
Please see attached PowerPoint Presentation.
```

Attachment: www.arb.ca.gov/lists/com-attach/19-aqip2013-14-Wz5SPQZrVWNSMVU7.pdf

Original File Name: Eileen Tutt.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:06:25

No Duplicates.

Comment 2 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: Daniel
Last Name: Witt
Email Address: dwitt@teslamotors.com
Affiliation: Tesla Motors

Subject: Tesla Motors Comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/20-aqip2013-14-Wj5QNwZpWWNWNQVp.pdf

Original File Name: Daniel Witt.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:10:43

No Duplicates.

Comment 3 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: Angela
Last Name: Strand
Email Address: angela.strand@smithelectric.com
Affiliation: Smith Electric Vehicles

Subject: Smith Electric Vehicles Comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/21-aqip2013-14-UTAGblI0VmAFbwlo.pdf

Original File Name: Angela Strand.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:10:43

No Duplicates.

Comment 4 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: Ted
Last Name: Harris
Email Address: tharris@calstart.com
Affiliation: EVI & Proterra

Subject: EVI Comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/22-aqip2013-14-B3NRMgBlBAhWOFMy.pdf

Original File Name: Ted Harris.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:10:43

No Duplicates.

Comment 5 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: David
Last Name: West
Email Address: david@viamotors.com
Affiliation: VIA Motors

Subject: CARB HVIP Letter
Comment:

```
Please see attached comment letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/23-aqip2013-14-VDAHYFcgVG4DYQdY.pdf

Original File Name: David West.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:17:43

No Duplicates.

Comment 6 for Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14 (aqip2013-14). (At Hearing)

First Name: Joesph
Last Name: Dalum
Email Address: inquiries@odyne.com
Affiliation: Odyne

Subject: Odyne Systems comments
Comment:

```
Please see attached comment letter.
```

Attachment: www.arb.ca.gov/lists/com-attach/24-aqip2013-14-UjhQOQFzUWcCdAFp.pdf

Original File Name: Joseph Dalum.pdf

Date and Time Comment Was Submitted: 2013-07-26 16:01:29

No Duplicates.