



December 19, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: Volkswagen Settlement – Environmental Mitigation Trust for California

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide comments on ARB's development of a Beneficiary Mitigation Plan as part of the Volkswagen Settlement Appendix D: Environmental Mitigation Trust (EMT). DANNAR strongly supports efforts to mitigate hazardous NOx and other criteria pollutants.

DANNAR has developed a robust off-road battery-electric mobile platform that offers multi-function capabilities, which can efficiently replace multiple pieces of single-purpose, conventional diesel cargo handling equipment to significantly eliminate toxic diesel emissions and reduce greenhouse gas emissions. The innovative, multi-purpose zero-emission platform, the Mobile Power Station (MPS), can be configured to easily work with up to 250 commercially available work attachments and tools that can lift, grab, push, extract, and haul to allow for flexible use to address daily port operations, including goods movement, ground support and cargo handling.

Accelerating the deployment of off-road zero-emission equipment will deliver multiple environmental and economic benefits to California. Existing diesel forklift and cargo handling equipment is currently a major source of greenhouse gas (GHG) emissions, smog-forming NOx, and toxic diesel particulate pollutants. Decades of old forklifts and cargo handling equipment are still extensively used in California ports and distribution centers, and have exceptionally high emission rates. The continuous idling of these pieces of equipment accounts for a sizable portion of California's GHG emissions and unacceptable toxic pollutants and associated exposures to impacted communities.

In order to effectively mitigate NOx emissions, DANNAR strongly supports maximizing investment in the eligible off-road mitigation categories, including forklifts & port cargo handling equipment and airport ground support equipment (GSE). Further support for these sectors will help further the State's goal of improving freight sustainability as well as carry out the requirements of the Consent Decree to mitigate NOx emissions through scrapping old, dirty equipment.

Thank you for the opportunity to provide comments on the Environmental Mitigation Trust and Beneficiary Mitigation Plan development. We look forward to continuing to work together to help carry out the goals of the Volkswagen Settlement Consent Decree and EMT.

Sincerely,



Gary Danner
Founder & CEO