



April 4, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: Low Carbon Fuel Standard Draft Regulation Order

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide comments on ARB's draft Low Carbon Fuel Standard Regulation Order ("LCFS"). DANNAR strongly supports the LCFS and efforts to encourage the use and production of cleaner low-carbon fuels in California.

DANNAR has developed a robust off-road, battery-electric mobile platform that offers multi-function capabilities that can efficiently replace multiple pieces of single-purpose, conventional diesel equipment. This includes forklifts and other freight related equipment, and helps 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 in support of daily operations and maintenance.

DANNAR strongly supports the proposed Energy Economy Ratio (EER) for electric forklifts of 3.8. Our company also strongly supports the proposed inclusion of other mobile freight and goods movement equipment as eligible technologies. Zero-emission battery electric off-road technology, including forklifts, are commercially available and can help phase out old, diesel equipment for cleaner, low-carbon alternatives. This will help continue transition of California's freight and goods movement sector towards electrification, and help carry out the objectives of the Sustainable Freight Action Plan as well as the Low Carbon Fuel Standard.

Thank you for the opportunity to provide comments on the Proposed LCFS Draft Regulation Order. We look forward to continuing to work together to help carry out the goals of the LCFS program.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Dannar", with a stylized flourish at the end.

Gary Dannar
President

GD/ecm

c: Claire Van Zuiden, Ted Harris, Charles Watson, File