

State of California
AIR RESOURCES BOARD

Addendum to the Final Statement of Reasons for Rulemaking

**ADOPTION OF PROPOSED AMENDMENTS TO THE ALTERNATIVE FUEL
CONVERSION CERTIFICATION PROCEDURES FOR ON-ROAD MOTOR VEHICLES
AND ENGINES**

Public Hearing Date: September 26, 2013
Agenda Item: 13-8-3
Addendum Prepared: September 11, 2014

I. Background

On August 8, 2014, the Air Resources Board (ARB or Board) submitted the Final Statement of Reasons (FSOR) for the Amendments to the Alternative Fuel Conversion Certification Procedures for On-Road Motor Vehicles and Engines to the Office of Administrative Law (OAL) for its review and approval. In the course of its review, OAL identified several issues with the FSOR. Each of these issues is addressed below.

II. CORRECTIONS TO THE FSOR

During OAL's review period, OAL requested additional changes to the Final Statement of Reasons. These changes included adding four comments received during the 45-day comment period which were not addressed in the Final Statement of Reasons because the *comments received were not relevant to the rulemaking action. Therefore, those comments do not require a response because they do not constitute objections or recommendations specifically directed at the proposed action or to the procedures followed by ARB in proposing or adopting the rulemaking action.

SUMMARY OF COMMENTS AND AGENCY RESPONSE

**A. Responses to Comments Received During the 45-Day Comment Period
and at the Public Hearing**

Written comments were received during the 45-day comment period in response to the September 26, 2013 public hearing notice, and written and oral comments were presented at the Board Hearing.

Listed below are the organizations and individuals that provided comments during the 45-day comment period:

| Commenter | Date | Affiliation | Abbreviation |
|----------------------|-----------------|--------------------------------------|---------------------|
| Prescott, Neil | 8/16/2013 | KLS Engineering | KLS |
| Prescott, Neil | 8/18/2013 | KLS Engineering | KLS |
| Malouf, George | 8/27/2013 | California Environmental Engineering | CEE |
| Trauman, Todd | 9/10/13 | CarbonBlue, LLC | CBL |
| *Filpop, H | 9/15/13 | Public Member | |
| *Cooper, Mark Gordon | 9/17/13 | CAFE | |
| *Rivers, Mark | 9/23/13 | AEROPRES CORP. | |
| *Kerstiens, Kenny | 9/23/13 | Public | |
| Szabo, Karen | 9/24/2013 | IMPCO Technologies | IMPCO |
| LaPant, Todd | 9/25/2013 | Transfer Flow Incorporated | TFI |
| Cox, David | 9/26/2013 | Coalition for Renewable Natural Gas | CRNG |
| Reed, John | 9/26/2013 | North American Repower | NAR |
| Garland, Lesley | Oral, 9/26/2013 | Western Propane Gas Association | WPGA |
| Carmichael, Tim | Oral, 9/26/2013 | Natural Gas Vehicle Coalition | NGVC |