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California Air Resources Board
Clerk of the Board
1001 I Street
Sacramento, CA 95814

RE: Comment to Off-Road Regulation Amendments – Equipment Identification Numbers (EIN) for Rental and Leasing Companies

The American Rental Association represents several hundred equipment rental businesses in California. Section 2449(f)(2) of the referenced regulation details when equipment identification numbers (EINs) must be affixed on vehicles. For the initial report, Staff has interpreted this section to mean that EINs must be affixed within 30 days after the initial reporting date of the fleet. The fleets with the largest amount of equipment, large fleets, must meet this requirement at the earliest date, April 1, 2009. A number of ARA member rental companies may have difficulty meeting this requirement because of the large number of units in their fleets.

Our members are diligently collecting data and preparing their initial reports. No members have asked for an extension to the initial reporting date. However, there may be difficulty affixing EINs to equipment rented and in the field since that equipment is not always easily accessible to the firm that owns it.

According to the rule, there are no emission benefits gained by the regulation in 2009. The first large fleet compliance date is March 1, 2010. Thus, there is no air quality benefit to be gained via enforcement during 2009 that results from affixing EINs.

We ask the Board to consider extending the time period for affixing EINs to the end of Calendar 2009 so as to not create a hardship on rental companies that have limited access to their fleet vehicles.

Sincerely,

A handwritten signature in black ink that reads 'John W. McClelland'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John McClelland