

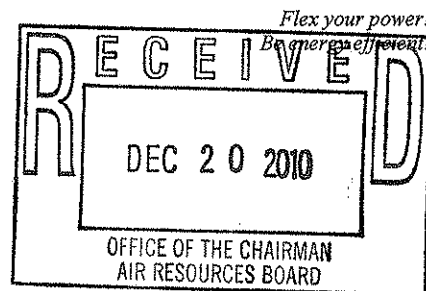
DEPARTMENT OF TRANSPORTATION

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December 16, 2010

The Honorable Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814



RE: Proposed Amendments to the In-Use Off-Road Diesel-Fueled and Off-Road Large Spark-Ignition Fleet Requirements

Dear Board Members:

The California Department of Transportation (Caltrans), Division of Equipment, would like to thank the California Air Resources Board (CARB) and staff for providing Caltrans the opportunity to participate in the development of the In-Use Off-Road Fleet Regulations. To better utilize California State resources to comply with the current regulations and clean air goals, Caltrans is submitting a couple of comments to the Board for consideration.

Recognition of Early Compliance

Caltrans requests compliance credit to the In-Use Off-Road Fleet program for the equipment replaced between March 1, 2010, and January 1, 2014, as opposed to the current proposed language allowing credit only for replacements between March 1, 2010 and March 1, 2011.

Additional Labeling Requirements

Caltrans requests that the current labeling requirements of placing one label per piece of equipment remain unchanged. The proposed rule change to place one label on each side of the equipment would require significant additional resources without apparent related benefit. For example, Caltrans will have to place an additional label on over 1,000 units across the State.

Your consideration of these matters is appreciated. If you need additional information, please contact me at (916) 227-9600.

Sincerely,

A handwritten signature in black ink that reads "Srikanth N. Balasubramanian".

Srikanth N. Balasubramanian
Chief
Division of Equipment