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May 23, 2007

VIA FACSIMILE AND U.S. MAIL

Dr. Robert Sawyer, Chairman
California Air Resources Board
1001 I Street
P.O. Box No. 2815
Sacramento, California 95812

07-5-6
May 05, 2007

Re: Proposed In-Use Off Road Diesel Regulation

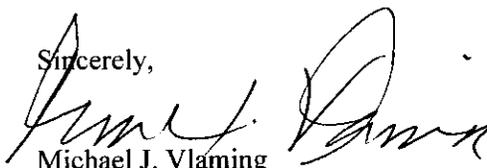
Dear Dr. Sawyer:

The Crane Owners Association is an association of mobile crane rental contractors that operate primarily in the northern 46 counties of California. Our members represent a substantial portion of the mobile crane rental market in this geographic area providing equipment ranging from boom trucks to large all-terrain hydraulic truck and crawler cranes to the construction industry. This equipment plays a very important and necessary role in every segment of the construction market including transportation, school, commercial, infrastructure and industrial projects.

Our members support all reasonable efforts to improve the air quality in California. It is an issue of importance to us and all Californians. However, we are very concerned with the proposed In-Use Off Road Diesel Regulation and our member's ability to comply with its provisions. The proposed compliance dates and the unavailability of cost effective options for our fleet of equipment presents real economic challenges. We have voiced our concerns at prior Board meetings and have been working with ARB staff to develop a regulatory program that recognizes the unique issues related to mobile cranes—including the ability to bring our equipment into compliance with multiple regulatory requirements. To that end, we have submitted a proposal for mobile cranes to ARB staff in early March and are looking forward to their response.

In our view, an effective regulation is one that enhances compliance by establishing realistic objectives while allowing those subject to the regulation some flexibility to meet the requirements according to their particular circumstances. To be sure, meeting the proposed ARB particulate emission and NOx objectives will require the commitment of significant economic resources of each company. Without flexible alternatives and realistic compliance schedules, construction companies—including crane rental companies—will suffer significant adverse consequences that will impact the entire California construction industry.

Sincerely,


Michael J. Vlaming
Executive Director

Cc: Crane Owners Association Members