



MICHAEL J VLAMING, EXECUTIVE DIRECTOR

447 GEORGIA STREET
VALLEJO, CALIFORNIA 94590-6004
TELEPHONE: 707.552.6040
FAX: 707.552.6090

December 9, 2008

VIA FACSIMILE & U.S. MAIL
916/322-3928

California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Truck and Bus Regulation (Agenda Item: 08-11-3)

Dear Chairperson Nichols and Board Members:

I am writing on behalf of the members of the Crane Owners Association. The Crane Owners Association is an organization of mobile crane rental contractors who provide mobile crane services principally in northern California. Our members own approximately one thousand mobile cranes of various sizes and configurations. Many of these mobile cranes are two engine truck cranes licensed to travel over the roadways of California and will be affected by the proposed regulation.

We have been following closely the Airborne Toxic Control Measures ("ATCM's") proposed and adopted by you. Our members have appeared and made public comments at prior Board meetings and have attended and participated in workshops regarding the Portable Engine Registration Program, the Off-Road ATCM and this proposed regulation. In addition, since the Board's direction at the December 7, 2006 meeting in Bakersfield, we have been actively working with CARB staff on modifications to existing and proposed regulations to address issues specific to cranes in an effort to create an efficient, effective regulation that will achieve the emission standards desired in an economically feasible manner.

This proposed regulation contains the results of our efforts in working with Board staff. The proposed regulation contains provisions that will affect two engine mobile cranes. These provisions modify existing PERP and Off-Road ATCM's and consolidate the various regulations to establish a single set of rules for two engine cranes. These proposed changes allow CARB to achieve its emission objectives and the crane rental companies a more cost effective and efficient means of complying. As such, we support the passage of the proposed Regulation. In the event there is a basis to delay acting on the proposed Regulation, we respectfully request that the two engine crane provisions be adopted to allow immediate implementation. Without this action, crane rental contractors will be forced to comply with multiple ATCM's and multiple reporting requirements.

Thank you for your attention and consideration of this very important matter.

Very truly yours,


Michael J. Vlaming
Executive Director

Cc: Crane Owners Association Members