

FINAL STATEMENT OF REASONS

1) The Update to the Initial Statement of Reasons

There are no changes to the initial statement of reasons.

2) Imposition of Mandate on Local Agencies or School Districts

The Board's regulatory action amending Section 553 in Article 1, Chapter 2, Division 1, of Title 13, does not impose any mandate on local agencies or school districts and imposes (1) no cost or savings to any state agency, (2) no cost to any local agency or school district that is required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of the Government Code, (3) no other discretionary cost or savings to local agencies, and (4) no cost or savings in federal funding to the state. No studies or data were relied upon to make this determination.

3) Summary of Comments Received and Department Response

The proposal was noticed on September 16, 2011, and made available to the public from September 16, 2011 through October 31, 2011.

One comment was received via first class mail from Joey Shields, President of the California Recreational Vehicle Dealers Association (CalRVDA). In his letter, Mr. Shields urged support for the fee increase as a means to ensure the Board would continue to "provide its valuable service to the new motor vehicle industry."

4) Determination of Alternatives

No reasonable alternative considered by the department, or that has otherwise been identified and brought to the attention of the department, would be more effective in carrying out the purpose for which these regulations are proposed or would be as effective and less burdensome to affected private persons than the proposed regulations. During the rulemaking process, no alternative that would lessen the adverse economic impact on small business was submitted.