Clerk of the Board, California air resources Board 1001 I Street, Sacramento, California 95814

Subject: Tractor Trailer Emissions standards

Honorable Chairman, Board Members and Staff:

When the EPA was first founded, Director Ruckleshouse decided to devise and enforce rules incrementally as being more practical. However, it is quite easy for the bureaucratic rule making to become the focus rather than environmental restoration. Is this happening here? Also, and just as important is this being seen as bureaucratic stuff which impairs compliance and reception? I would offer two additional programs as options.

Train. My city's general plan twenty some years ago promoted intermodal goods transport. Would not some intermodal facilities at harbors for rail and truck and ship be soon cost effective to be offered as a option and as a start for increased rail use?

Tractors As ag is generally exempted and resented by those who are not would some requirement on tractors themselves be appropriate. Though not often subject to daily use could not every four years for a tune up and STAR certification on tractors somewhat aid in the air quality and mollify the truckers passing by? Speaking of passing vehicles, the world record for pile ups was dust from a cotton plow down on I 5 and should not such tractor use be prohibited during no burn, high index or high wind days?

True any regulation of San Joaquin ag will be decried, while subsidy and bail out is welcome, but having noticed the major ag producer burning on Garces Highway when the index was 250, it just may be time to take a look at what is a de facto subsidy. This is a secondary impact to water transport and ag is seeking to have tunnels to transport water from less subsidized folk to replace the water they will lose for environmental reasons.

Sincerely,

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