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Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: On-Road Diesel Engine Emission Rule Amendments (comment deadline 09/03/09)**

Mendocino Redwood Company, LLC, (MRC) appreciates the opportunity to respond to the Air Board Staff's suggested modifications to the proposed regulation for In-Use On-Road Diesel Vehicles presented at the December 2008 Board Hearing. There are two specific items that are of greatest concern to us.

The first is the Electronic Tracking System requirement for NOx-exempt areas. Due to the topography of Mendocino County, there will be numerous occasions when our trucks are operating in the woods and data gaps will exceed 30 minutes because of inability to have access to a satellite. There must be an alternate means of meeting this requirement when satellite tracking is not consistently feasible.

Secondly, the revision of the fleet size definition to include segments of the business located outside of California is inappropriate. This is a California regulation intended to control emissions within the state. The number of vehicles a company may have operating in other states that never enter California should have no bearing on their compliance with this rule.

Thank you for taking these comments into consideration.

Sincerely,

Cheryl Moore  
Environmental Manager