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# Regional Hispanic Chamber Of Commerce

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September 22, 2009

Mary Nichols  
Chair - California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

**Re: Agenda Item 09-8-5: Public Meeting to present ARB's Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions**

Dear Chair Nichols:

The Regional Hispanic Chamber of Commerce (RHCC) is grateful for the opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* to be presented to the ARB Board Members at the board meeting on September 25<sup>th</sup>. The Regional Hispanic Chamber of Commerce is dedicated to the promotion, development and continued growth and success of the Southern California Hispanic Business Community and its Associations. The RHCC agrees ARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. Railroads and other industries have experienced a 20-30% reduction in California business activities in this recession. As the most environmentally sound way to move goods over land, rail is a key component of the goods movement system in California and across the nation.

ARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources:

- ARB estimates emissions at rail yards will be reduced over 55% by 2015 and by over 66% by 2020 resulting from federal standards and state regulations of other rail yard sources as well as enforceable agreements with the railroads;
- Existing projections may overestimate growth in the next 5-10 years given the current recession, resulting in dramatically lowered emissions for the foreseeable future;
- Full implementation of the proposed locomotive measures in the staff's Recommendations "translates to a 65 percent reduction in potential cancer risks in communities surrounding railyards by 2015 and 85 percent reduction by 2020" (Page ES-3).

The RHCC urges ARB to preserve the efficiency of the system as a whole, and to continue to reduce emissions within that context. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

President - Regional Hispanic Chamber of Commerce

