County of Placer Board of Supervisors

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District 5



September 22, 2009

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

County E:

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

Dear Chair Nichols:

Placer County appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Rail yard Emission Reductions* being presented to the Air Resources Board Members at your September Board meeting. As not only a member of the Board of Supervisor's but also as a past Roseville Council Member, including a tenure as Mayor, I have long supported both improving rail transportation and improving air quality at the same time. CARB's preferred approach should be in the pursuit of an incentive program to maximize the emissions efficiency benefits of rail transportation.

Transporting goods by rail yields criteria pollutant emission benefits, reduces GHG's and reduces freeway congestion. Rail is one of the most environmentally sound way to move goods over land and is a key component of the goods movement system in California. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

The Air Resource Board has had success with past incentive programs and enforceable agreements with the Railroads. For example as cited on Page 5 of the Recommendations document, "staff estimates that diesel PM emissions from all sources at rail yards will be reduced by about one-third by 2010, about half by 2015, and about two-thirds by 2020 even with a strong projected growth in rail operations". These reductions result from federal standards and state regulations of other rail yard sources (such as cargo handling equipment), as well other agreements with the railroads.

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To summarize, an incentive program which serves to both preserve competitiveness and efficiency of the goods movement system while driving down emissions to protect the public's health only makes sense and should be pursued.

Thank you for allowing the opportunity to comment on this important issue.

Sincerely,

COUNTY OF PLACER

F.C. "Rocky" Rockholm, Chairman Board of Supervisors