



September 23, 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 Pacific Merchant Shipping Association (PMSA) appreciates this opportunity to comment on the ARB staff's "Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions". PMSA represents ocean carriers and terminal operations that move approximately 90 percent of the containerized cargo through the west coast ports of the United States. Much of that cargo then is moved to and from the marketplace by rail, making it a critical element in the overall success of the goods movement system. Given the issues of federal preemption, and lack of available technologies, PMSA supports the California Air Resources Board (CARB) preferred approach of pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

The environmental benefits of rail in transporting goods is evident in any comparison with other modes of landside transportation, most notably trucks. Compared to trucks moving goods by rail clearly reduces criteria pollutant emissions and Green House Gases, and improves freeway congestion by taking trucks off the road. Any action by CARB should preserve and promote the efficiency of the goods movement system as a whole by continuing, and expanding on, use of rail to reduce emissions.

CARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources and these are well documented in the staff report. These reductions result from federal standards and state regulations of other rail yard sources (such as cargo handling equipment), as well other voluntary agreements with the railroads. Additionally, ARB states existing projections may overestimate growth in the next 5-10 years given the current recession, resulting in lowered emissions for the foreseeable future.

Pursuing the proposed incentive program, in combination with the federal standards, will allow CARB to achieve their goal of reducing DPM from goods movement sources 85% by 2020. 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".

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. A California incentive program preserves competitiveness and improve the efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California. This would avoid putting California's critical components of the international supply chain at a further competitive disadvantage and avoid any additional diversion of cargo to other ports of entry in the United States.

Thank you for this opportunity to comment on this important issue to the goods movement system in California. If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "T.L. Garrett". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

T.L. Garrett
Vice President