



September 17, 2009

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

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

Dear Chair Nichols:

On behalf of the Long Beach Area Chamber of Commerce, I want to express my appreciation for the opportunity to comment on the ARB staff's Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions ("the Recommendations") being presented to the Board Members at the September board meeting.

The Long Beach Area Chamber is the platform for business to provide leadership, education and advocacy so that the Long Beach area thrives in the 21st century. The Chamber agrees CARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation. Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion. Rail is the most environmentally sound way to move goods over land and is a key component of the goods movement system in California and across the nation. Operational impacts on one piece of the system can cause disruption to the associated ship, rail, and truck operations throughout California. It is imperative that any action by CARB preserves the efficiency of the system as a whole, and should continue to reduce emissions within that context.

Moreover, CARB has had significant success with past incentive programs and enforceable agreements with the railroads and other international trade emissions sources. On Page 5 of the Recommendations, "staff estimates that diesel PM emissions from all sources at railyards 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." Additionally, ARB states existing projections may overestimate growth in the next 5-10 years given the current recession, resulting in dramatically lowered emissions for the foreseeable future.

Pursuing the incentive program 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" (Page ES-3).

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. Right now, in Long Beach, the unemployment rate is soaring and thousands of people are looking for work. California must seek methods – like this incentive program – to preserve competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Again, thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Randy Gordon". The signature is fluid and cursive, with the first name "Randy" and last name "Gordon" clearly distinguishable.

Randy Gordon
President and CEO

CC:

State Senator Alan Lowenthal	916-327-9113
State Senator Jenny Oropeza	916-323-6056
State Senator Rod Wright	916-445-3712
Assembly Member Warren T. Furutani	916-319-2155
Assembly Member Bonnie Lowenthal	916-319-2154
California Chamber of Commerce	916-325-1272