

09-8-5

Comments by the Union of Concerned Scientists
RE: Diesel Emission and Cancer Risk Reductions from Locomotives and Rail Yards
September 25, 2009

The Union of Concerned Scientists strongly supports efforts to reduce the health risks from exposure to diesel exhaust and applauds the Air Resources Board for their continued commitment. Even with the strong actions this board has taken over the past decade to control particulate emissions from in-use and new diesel engines, there still much work to do as evidenced by the health risk assessments of California's Railyards.

ARB staff has carried out an extensive review of technical options that are available to reduce diesel pollution expose at rail facilities. They have identified numerous options from new, cleaner locomotive technology in addition to changes in operational practices that can further reduce exposure. Implementing these emission reduction options will reduce diesel PM, NOx and in many cases greenhouse gases, and are essential for protecting the health of nearby residents.

But to ensure that these measures are implemented and actually do reduce health risks, there must also be accountability. Enforcement is an essential tool of ensuring emission reductions occur and health risks are reduced. ARBs nearly weekly announcements of diesel enforcement actions are a reminder of how important an enforcement component is to a successful program.

Options to reducing diesel emission at railyards also present a significant opportunity to reduce GHG emissions. New rail and yard equipment often emits less carbon emissions than the older equipment being replaced, and electrification of equipment can provide even greater NOx, PM and GHG benefits.

Investing in solutions today that reduce all three of these pollutants will help California meet its air quality and climate change goals. This especially makes sense when making 20 and 30 year investments in equipment and infrastructure. Solutions that provide immediate relief to the communities directly impacted by rail emissions must not be compromised, but GHG emission reduction should be maximized whenever possible

In summary, we ask that ARB follow a regulatory course of action to reduce diesel emissions at railyards that is consistent with ARB's legal authority. In addition, ARB should expand their analysis to quantify in greater detail the potential GHG reductions from measures outlined in the Technical Report.

Cost-effectiveness calculations of options which reduce significant GHG emissions should include not only NOx, PM, but GHG benefits, so that we can protect the public's health now with actions that will also pay dividends in the future to help us avoid the worst consequences of climate change.

Thank you.