

Swati Prakash
09-8-5



Bay Area Ditching Dirty Diesel Collaborative

September 24, 2009

California Air Resources Board
1001 I Street, Sacramento CA 95818

Honorable Board Members:

As members of the Bay Area Ditching Dirty Diesel Collaborative, including community residents of neighborhoods that face high levels of air pollution from trains and railyards, we are writing to strongly **urge you to take the most aggressive measures in your power to ensure that health risks from locomotive and rail yard activities are reduced quickly.** The Ditching Dirty Diesel Collaborative is a regional alliance of over 20 Bay Area grass-roots community based organizations, labor, environmental science and public health non-profit organizations. The work of the Ditching Dirty Diesel Collaborative is directed by impacted residents from low-income communities of color in the Bay Area,¹ including West Oakland, Richmond, San Leandro, and Bayview Hunters Point (San Francisco). The poor air quality where we live, work, play, and learn impacts us, our families, and our neighbors.

In the Bay Area, there are two railyards considered "major" railyards, in Richmond and West Oakland, that together generate 15.9 tons of diesel pollution and put 203,000 people at elevated risk of cancer (some as high as over 250 additional cancers per million residents). In addition, Alameda and San Francisco Counties are home to other railyards too small to be recognized formally by CARB (e.g. in San Leandro), but which generate enough diesel pollution, noise, and other neighborhood impacts to be of concern from a human health perspective. All of these railyards, as well as most of the railroad lines that freight trains travel on, are located in predominantly low-income neighborhoods and communities of color, resulting in a disproportionate impact on these communities. **You have the opportunity to address this environmental injustice as well as to improve air quality for all Californians, by taking action to reduce diesel pollution from rail operations in this state.**

¹ We respectfully direct you to our personal testimonials in our report "Paying With Our Health: The Real Impact of Freight Transport in California" (available: http://www.pacinst.org/reports/freight_transport/PayingWithOurHealth_Web.pdf) should you wish to know more about our personal encounters with freight transportation sources, including locomotives and railyards.

Numbers and maps do not capture what it is like to live near a railyard and near rail lines carrying cargo trains. For residents in these communities, our daily views out our windows include the sight of black clouds of diesel exhaust rising from the railyard, and the accumulation of black soot on our windowsills and throughout the house. In the city of Richmond, there is an elementary school less than five hundred feet from the BNSF railyard and several neighborhoods bordering this railyard, as well as many homes, schools and playgrounds in neighborhoods that are boxed in by railroad tracks originating at this yard.

In addition to the health threats posed by this diesel pollution, railyards and rail lines also pose significant other health risks from their operations – risks that can be concurrently reduced through the implementation of site-specific measures at each railyard. For example, those of us who live near the West Oakland, Richmond, and San Leandro railyards live with the tremendous noise and vibrations from trains switching inside these yards. In the case of San Leandro, people live so close to the railyard that the vibration from switching operations is causing homes to sink. This railyard is also the target of illegal dumping, which in the past has led to fires and potentially hazardous exposures. In many communities there is no wall separating rail lines from residential communities, resulting in far too many, entirely avoidable deaths from trains colliding with pedestrians.

While we are aware that CARB's jurisdiction is focused on health risks from air pollution, we believe that by exercising your authority to implement site-specific measures, you can help develop productive dialogue between rail companies and impacted communities, and identify opportunities to reduce health risks from many sources.

We urge CARB to use its full legal authority that CARB has to reduce the health risks associated with rail and railyard pollution, and to protect all California residents and most impacted communities living in the rail yard areas. Specifically we urge you to take the following steps:

1. Pass the proposed resolution to initiate rulemaking to implement Options 1,2,5, and 7 in the staff recommendations for technologically feasible and cost effective locomotive pollution control measures, and to finalize site-specific Diesel Particulate Matter Mitigation Plans for the 18 individual major California Railyards
2. We urge you, however, to not stop at these 18 individual railyards, but instead to extend the development of site-specific measures to all railyards in California. There are several railyards throughout California that did not make the cut-off for being considered "major," in 2005, and since then have grown significantly in the size of their operations, a trend that will only continue or accelerate in the coming years.
3. Advance concurrent health risk reductions by prioritizing publicly-funded incentive dollars for rail projects that also reduce the related health risks that come from rail operations, in addition to risk from diesel pollution. For example, erecting sound barriers and walls to separate children and other pedestrians from railroad tracks will go a very long way towards reducing exposure to noise, and preventing some of the deaths that are incurred throughout the state from train collisions with pedestrians.

We would like to thank you in advance for considering these requests and we look forward to working with you and your staff on a plan that will achieve health protective measures for California communities.

Sincerely,
For the Ditching Dirty Diesel Collaborative

Margaret Gordon
West Oakland Environmental Indicators Project

Delphine Smith, Richmond resident and Contra Costa Asthma Coalition

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Bay Area Healthy 880 Communities

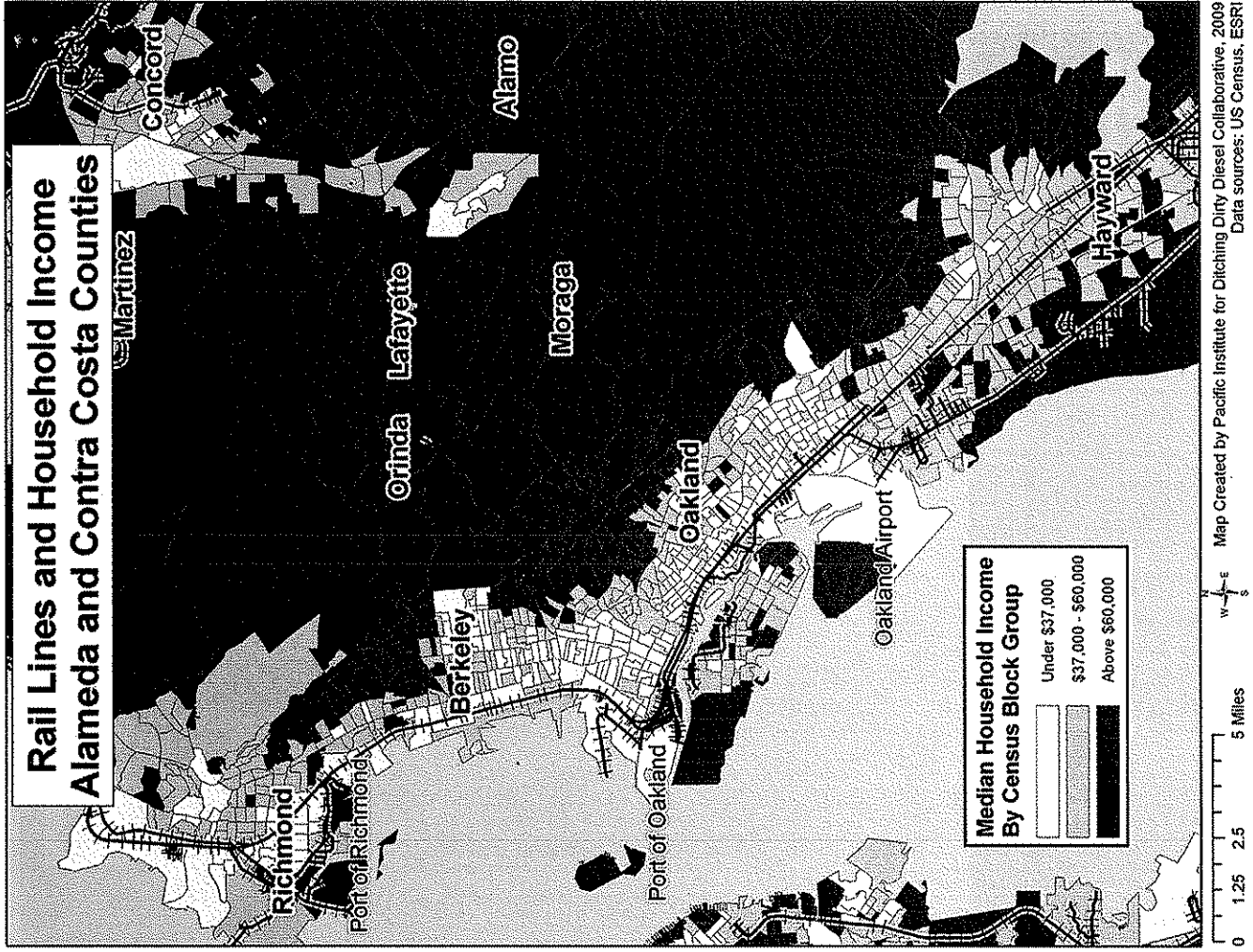
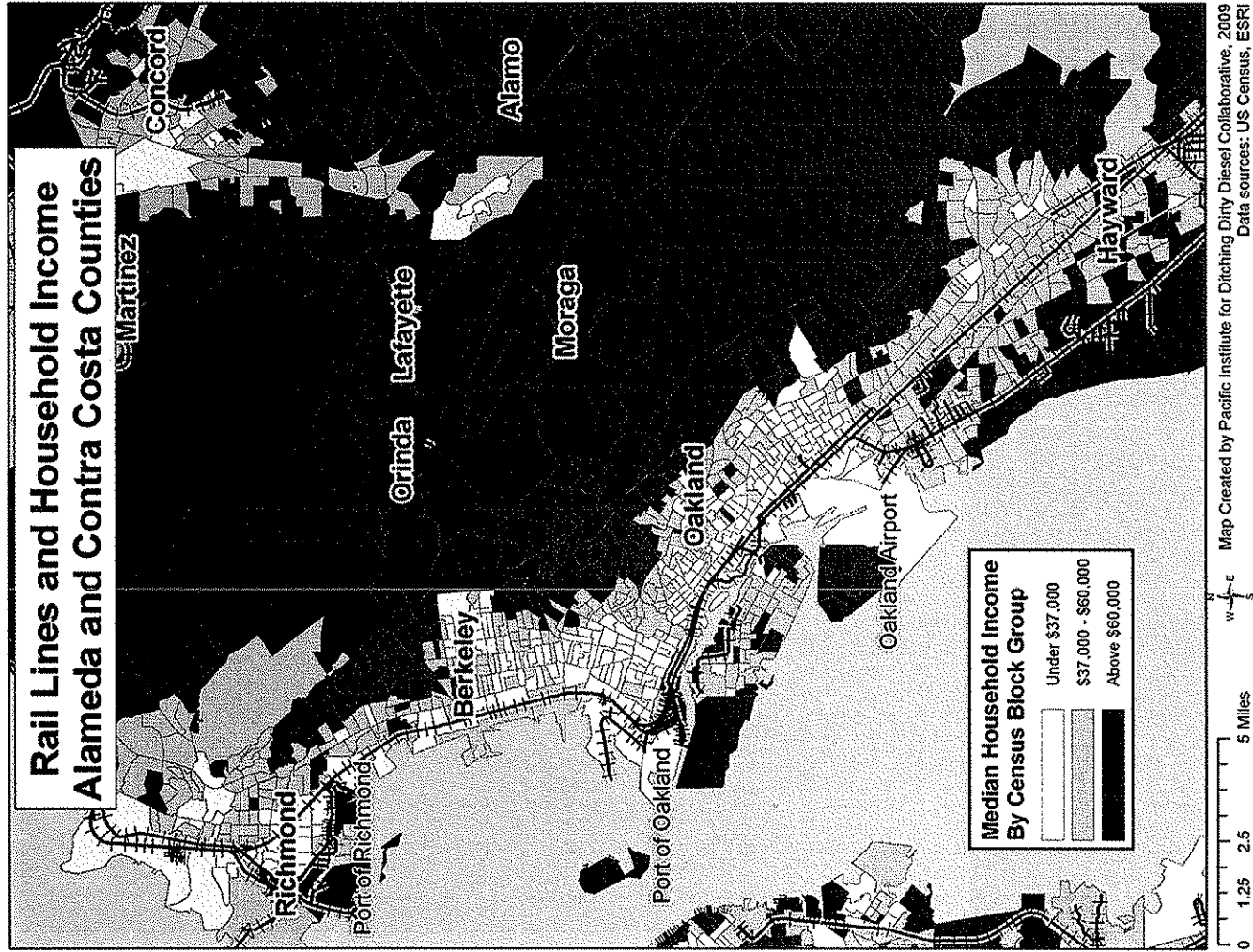
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Bayview Hunters Point Community Advocates

Anna Yun Lee
Communities for a Better Environment

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Natural Resources Defense Council

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Regional Asthma Management & Prevention

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BNSF Railyard and Surrounding Neighborhoods **Richmond, CA**



Rail Lines and Sensitive Sites in Richmond, CA

