

Kirk Markwald
09-8-5

Association of American Railroads Support Materials

September 25, 2009



Letters of Support

1. Placer County Air Pollution Control District
2. Supervisor Tavaglione, County of Riverside Dist. 2
3. California Hispanic Chambers of Commerce
4. California Shortline Railroad Association
5. Placer County Board of Supervisors
6. Long Beach Area Chamber of Commerce
7. Regional Hispanic Chamber of Commerce
8. Progress Rail Services Corporation
9. Sacramento Asian Chamber of Commerce
10. California Council for Environmental and Economic Balance
11. Richard Carrion, Colton Resident
12. Sacramento Metropolitan Chamber of Commerce
13. Miratech Corporation
14. MotivePower, Inc.
15. FuturePorts
16. NAIOP Southern California, Commercial Real Estate
Development Association
17. General Electric Transportation Systems
18. Roseville Chamber of Commerce
19. Johnson Matthey Catalyst
20. The California Trade Coalition
21. Lincoln Area Chamber of Commerce

- 22. Los Angeles Business Federation
- 23. Pacific Merchant Shipping Association
- 24. California Chamber of Commerce
- 25. Port of Oakland
- 26. City of Roseville
- 27. Electromotive Diesel
- 28. Rocklin Chamber of Commerce
- 29. GSC Logistics



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www.placer.ca.gov/apcd

Thomas J. Christofk, Air Pollution Control Officer

September 21, 2009

Mary Nichols, Chair
California Air Resources Board
1001 "T" 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:

Placer County Air Pollution Control District appreciates this opportunity to comment on the ARB Staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to your Board Members at the September board meeting. As you are well aware, the District's interest in this item centers on the Roseville rail yard and we have made it a priority to reduce the health risk from locomotive emissions to rail yard neighbors. We offer three comments on the draft recommendations and the rail sector program in general.

Support Cooperation and Incentives

The District has developed a workable relationship with Union Pacific Railroad (UPRR) based on cooperation and mutual benefit. Roseville was the first rail yard that went through the HRA (Health Risks Assessment) process and set the format for other rail yards in California. This was initiated by the District with cooperation from UPRR. In December 2004, an agreement was signed between UPRR and the District Board resulting in mitigation measures such as reduction of unnecessary idling, early introduction of ultra-low sulfur diesel fuel at Roseville, switcher locomotive fleet replacements and or upgrades, emission control from the service, test, and repair locations, and a stated goal of a 25% reduction of diesel particulate emissions from the yard from the baseline 2000 emissions by the end of 2007. This agreement became the basis of the ARB/Railroad Statewide Agreement of 2005.

The mitigation measure of emission control from the service, test, and repair locations in the 2004 agreement led to development of the hood concept. UPRR was cooperative in the concept development, demonstration and testing of the hood equipment at the Roseville rail yard. Another feature of the 2004 agreement was to conduct a 3-year emissions monitoring project (which evolved into four years of monitoring) around the Roseville yard.

Based on the above history with UPRR, the District agrees that CARB's preferred approach to further emission reductions should be pursuing cooperation and incentive programs in order to leverage railroad company funds in replacing or upgrading to equipment with lower emissions. The

District believes that cooperation with the railroad companies, rather than fighting a legal battle over regulation, is the best way to achieve emission reductions from locomotives and rail yards. The District and UPRR are interested in incentive funding to replace additional switch locomotives at the Roseville rail yard. Goods Movement and AQIP (Air Quality Improvement Program) incentive funding could possibly help with the installation of a hood system at the Roseville rail yard.

Hood Cost Effectiveness Analysis

District Staff also offer a comment on the Advanced Locomotive Emission Control System (ALECS) section on options for emission reductions in rail yards. District Staff thinks that the cost effectiveness analysis detailed in the Technical Options document is far too high at \$23 per pound and reflects poorly on this emission reduction option. The ARB analysis draws heavily from the TIAX analysis published in the *Evaluation of the Advanced Locomotive Emissions Control System (ALECS)* released on April 2, 2007. In this report on the ALECS testing, TIAX estimated cost effectiveness at between \$3.60 and \$9.00 per pound for the range of potential uses of the ALECS in the Roseville rail yard. The ARB analysis severely discounts the emission reductions stated in the TIAX study by referencing the emissions profile of various activities developed from year 2000 activity data for the 2004 HRA of the Roseville Railway. The ARB cost effectiveness would reflect installation of an ALECS in Roseville if yard operations were carried on as usual without regard to optimizing for use of the hood system. But, it would not make sense to make a \$25 million investment in equipment and operations cost then continue to do business as usual.

Union Pacific Railroad and the District have performed studies to identify potential modification of work flow in the yard (West side of the diesel shop) to maximize use of the ALECS for load testing while providing economies over the current way of doing business. One example of this economy takes advantage of the noise suppression in using the hood for high-power testing of locomotives. Currently, during night hours, locomotives to be run at high power for load testing or diagnostics are taken to a shielded location to avoid complaints from nearby residents. With a hood at the diesel shop, this movement of locomotives would be reduced thereby saving time and fuel.

Another incentive for UPRR to slightly modify work flow in the service area to maximize use of a hood system is the potential for emission reduction credits (ERCs). ERCs are becoming increasingly valuable in the Sacramento area and even more valuable in the South Coast AQMD. The District has promulgated a rule (Rule 515) for issuing ERCs for hood type equipment at rail yards. In the South Coast AQMD, the value of ERCs generated by a Roseville type hood system would more than pay for equipment and operation costs.

Continued ARB Support for District Initiatives to Reduce Emissions at Roseville Rail Yard

ARB has benefited from the pioneering work of the District in proposing and participating in the first rail yard HRA and in the 2004 agreement between the District and UPRR, which served as a model for the Statewide ARB/Railroad agreement. Moving forward, the District and UPRR are funding an agreement with Sierra Research to update the emissions and dispersion analysis using 2008 activity data and the latest rail yard methodology, and comparing analytical results with the actual measured emissions from the four years of monitoring data. The District has requested that ARB perform the health risk assessment part of this effort. The District was recently advised that ARB will not participate in this effort, which we believe to be a mistake. We think that the benefit of this HRA update will be to show the community that there is progress in reducing the health risk. This effort

also offers a rare opportunity to validate the emissions and dispersion model with real measured emissions data.

Additionally, the District has initiated Phase II of the ALECS demonstration project with a number of stakeholders, which does not include ARB. This is unfortunate because the use of this technology in the proper application can significantly reduce emissions and the subsequent health risks. ARB's locomotive and rail yard emissions reduction program generally addresses all areas of rail operations except maintenance and servicing functions, which account for significant emissions. The ALECS technology is specifically targeted for emissions reductions in these areas, which often results in the point of maximum individual cancer risk (MICR). PCAPCD would welcome ARB's participation in this project.

Should staff have any questions or need of further information regarding these comments, please contact me at (530) 745-2321.

Sincerely,



Thomas J. Christofk
Air Pollution Control Officer



JOHN F. TAVAGLIONE
SECOND DISTRICT SUPERVISOR
BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE



STAFF

JOHN FIELD, Chief of Staff
DONNA JOHNSTON, Senior Legislative Assistant
KAREN CHRISTENSEN, Senior Legislative Assistant
LILIANA ALLIN, Legislative Assistant
SUSAN SWIECA, Legislative Assistant

September 21, 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:

I appreciate this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. I agree 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. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

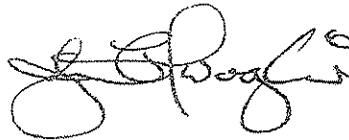
Moreover, CARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources. On Page 5 of the Recommendations document, "*staff estimates that diesel PM emissions from all sources at railyards will be reduced by about one-third by 2010, about half by 2015, and about two-thirds by 2020, even with a strong projected growth in rail operations.*" 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. 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.

Chair Mary Nichols
September 21, 2009
Page 2

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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Tavaglione", with a stylized flourish at the end.

John F. Tavaglione,
Supervisor Second District

cc: Members of the Board
Mr. James Goldestene



September 21, 2009

Mary Nichols, Chairwoman
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 Rail Yard Emission Reductions

Dear Chair Nichols:

The California Hispanic Chambers of Commerce (CHCC) has a network of over 65 Hispanic chambers and business associations throughout the State of California. Through its network of Hispanic chambers and business association, the CHCC represents the interest of over 720,000 Hispanic business owners in California. The CHCC is the premier and largest regional ethnic business organization in the nation that promotes the economic growth and development of Hispanic entrepreneurs and California's Emerging Businesses.

CHCC 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 Board Members at the September board meeting. CHCC believes 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 reduces 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. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

Many of our members, their employees and family members are a part of the logistics industry, providing transportation services and other supply chain services around the state, particularly in the Los Angeles basin. Our members live and work in the communities surrounding all types of goods-movement facilities such as rail yards around California. We are concerned about the air we breathe and our health, however, we have also become increasingly concerned about the diversion of freight away from the ports of Los Angeles and Long Beach, in part due to ill-conceived emission reduction programs proposed at the state and local level. CARB should take care not to further complicate this situation by advancing measures, which could send the wrong signals in the market place and harm small Hispanic-owned businesses, while failing to achieve significant emission reductions.

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

California Hispanic Chambers of Commerce

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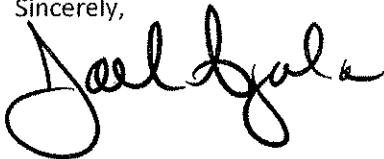
document, "staff estimates that diesel PM emissions from all sources at rail yards will be reduced by about one-third by 2010, about half by 2015, and about two-thirds by 2020, even with a strong projected growth in rail operations." These reductions result from federal standards and state regulations of other rail yard sources (such as cargo handling equipment), as well other agreements with the railroads.

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 rail yards by 2015 and 85 percent reduction by 2020" (Page ES-3).

International trade is a vital economic engine in California, particularly for Hispanic-owned and run businesses doing business with Latin America, and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect the health of employees and residents in California.

Sincerely,



Joel Ayala
President & CEO

cc: California Air Resources Board Members
Mr. James Goldestene

California Hispanic Chambers of Commerce

Main Phone: 916.444.2221 • Fax: 916.669.2870 • Email: office@cahcc.com

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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 California Short Line Railroad Association (CSLRA) appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. CSLRA believes 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. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

Many of our members, their employees and family members are a part of the logistics industry, providing transportation services and other supply chain services around the state. Our members live and work in the communities surrounding all types of goods-movement facilities such as rail yards around California. We are concerned about the air we breathe and our health, however, we have also become increasingly concerned about the diversion of freight away from California's ports, in part due to ill-conceived emission reduction programs proposed at the state and local level. CARB should take care not to further complicate this situation by advancing measures which could send the wrong signals in the market place and harm small businesses, while failing to achieve significant emission reductions.

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 document, "*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*

341 Industrial Way, Woodland, CA 95776
Tel: 530-668-8480 • Fax: 530-666-2919

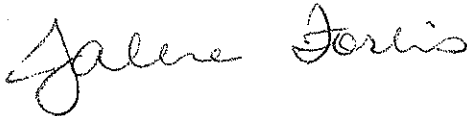
www.cslra.org

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. 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, particularly for small businesses such short line railroads, and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees’ and residents’ health in California.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jalene Torris".

cc: Members of the Board

Mr. James Goldestene

County of Placer Board of Supervisors

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F.C. "ROCKY" ROCKHOLM
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ROBERT M. WEYGANDT
District 2

JIM HOLMES
District 3

KIRK UHLER
District 4

JENNIFER MONTGOMERY
District 5



September 22, 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 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.

September 22, 2009
Mary Nichols
Chair
California Air Resources Board

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

A handwritten signature in black ink, appearing to read 'F.C. Rockholm', with a long horizontal flourish extending to the right.

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



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 |



Regional Hispanic Chamber Of Commerce

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RHCC

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Andy Torres
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David Gonzalez
City of Long Beach

September 18, 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 Regional Hispanic Chamber of Commerce (RHCC) appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. The RHCC agrees CARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail.

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. Any action by CARB should preserve 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 document, "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." 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

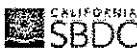
President - Regional Hispanic Chamber of Commerce



that was easy.



Department of General Services



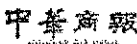
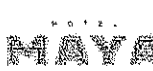
for Southern California



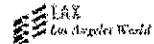
EDISON



bp



Metro





September 21, 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:

Progress Rail Services Corporation ("Progress Rail") appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. Progress Rail agrees ARB's approach should be pursuing a voluntary incentive program to reduce emissions from existing locomotives and 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. Any action by ARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

Moreover, ARB 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 document, "*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.*" 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. 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.

Although we do not believe that going beyond voluntary incentive-based measures and imposing the mandatory measures that are also included in the *Recommendations* is warranted, international trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times.

A voluntary incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

Kenneth Hofacker
Senior Vice President

cc: Members of the Board
Mr. James Goldestene



sacramento
ASIAN PACIFIC
chamber of commerce

sacasiancc.org

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September 18, 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 Ms. Nichols, Members of the ARB, and Mr. Goldstene:

The Sacramento Asian Pacific Chamber of Commerce appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. The Sacramento Asian Pacific Chamber of Commerce agrees CARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

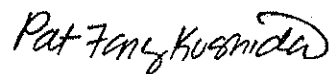
Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion. Rail is the most environmentally sound way to move goods over land and is a key component of the goods movement system in California and across the nation. Any action by CARB should preserve 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 voluntary agreements with the Railroads and other international trade emissions sources. On Page 5 of the Recommendations document, "*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.*" These reductions result from the voluntary agreements with the railroads in combination with federal standards and state regulations of other rail yard sources (such as cargo handling equipment). Additionally, ARB states existing projections may overestimate growth in the next 5-10 years given the current recession resulting in lowers emissions in the near term.

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 2020¹.*

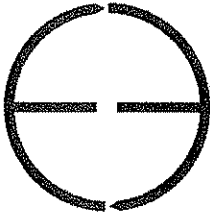
International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink that reads "Pat Foley Kusmida". The signature is written in a cursive, flowing style.

President/CEO

Sacramento Asian Pacific Chamber of Commerce



California Council for Environmental and Economic Balance

100 Spear Street, Suite 805, San Francisco, California 94105

415-512-7890 phone, 415-512-7897 fax, www.cceeb.org

September 21, 2009

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

Re: Agenda Item 09-8-5 (September 25, 2009): Public Meeting to Consider Staff Recommendations to Provide Further Locomotive and Railyard Emissions Reductions

Dear Chair Nichols:

The California Council for Environmental and Economic Balance (CCEEB) is a coalition of business, labor and public leaders, which strives to advance collaborative strategies for a strong economy and healthy environment. We appreciate the opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* that is being presented to the Air Resources Board on September 25th. We understand that the CARB staff's preferred approach is to pursue an incentive funding program that will maximize the emissions efficiency benefits of rail transportation. CCEEB supports such an approach.

The CARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources. Based on measures already adopted, your 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*" (Page 5). These real reductions are significant. They came about through a carefully balanced combination of federal locomotive standards, state regulations of other rail yard sources (such as cargo handling equipment), as well enforceable agreements with the railroads, over a decade or more.

While the CARB may or may not be correct that it has regulatory authority over a narrow range of existing locomotives, CCEEB believes it is correct for the CARB not to exercise that authority, as doing so would only force the railroads to install the old emissions control technology (Tier 0), instead of encouraging them to install the most stringent emissions controls available (Tier 2 or better).

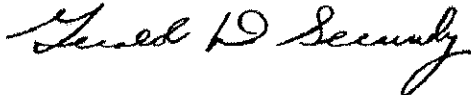
Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion. Rail is the most environmentally sound way to move goods over land and is a key component of the goods movement system in California and across the nation. International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times where railroads and other industries have experienced a 20-30% reduction in California business activities. A well-targeted and realistic incentive program, such as the one preferred by your staff, will preserve competitiveness and efficiency of the goods

Mary Nichols
September 21, 2009
Page 2

movement system, while driving down emissions to protect employees' and residents' health throughout California.

CCEEB believes the Railroad-Air Resources Board partnership is on the right track. Targeted incentive funding will help continue such a program into the future.

Sincerely,

A handwritten signature in cursive script, reading "Gerald D. Secundy".

GERALD D. SECUNDY
President

cc: Members of the Board
 Mr. James Goldstene
 Mr. Mike Jaczola
 Mr. Harold Holmes
 Mr. Kirk Marckwald
 Ms. Sarah Weldon
 Mr. Michael Barr
 Mr. William Quinn
 Mr. Jackson R. Gualco
 Mr. Allan Lind

September 17, 2009

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

Re: Improvements made to idling locomotive management since 2005 MOU

Dear Chair Nichols:

My name is Richard Carrion. I reside at 1000 South 8th Street in Colton, California, south of the Union Pacific Railroad's West Colton Yard facility, on the line known as the Riverside Industrial Lead.

For the past several years, I have contacted Union Pacific on numerous occasions to make complaints regarding locomotives idling for extended periods of time. I have engaged your staff and the Railroad on other (operational) issues, and have attended all four of the community meetings held in my area.

Union Pacific has listened to my concerns, seriously considered the issues raised, and responded. They have moved the location for handling some trains to a less-populated area further south of my home; posted signs to remind train crews to not idle in the area; and have had managers remind train crews when the instructions are not followed.

Since the ARB and UPRR signed a Memorandum of Understanding in June 2005, I have noticed a very significant reduction in idling near my home. By utilizing the toll-free number to contact the UPRR Response Management Communications Center, as well as by contacting Mr. Harold Holmes of your staff, the number of calls I have made to the Railroad has dropped from an average of more than once per week in early 2005 to a current average of about once every other month. I understand that there are many different crews that work in this area and, while not perfect, the situation has vastly improved from the way things were in early 2005.

I have also been pleased with the use of the toll-free number, and to have received prompt, courteous, and professional written and verbal responses from UPRR Response Management personnel and environmental staff, as well as Mr. Holmes of your staff, even during non-business hours, and timely notification of local managers that work to resolve my issues.

I fully support the improvements that have been made as a result of the 2005 MOU, and I appreciate the ongoing efforts of ARB and the Railroad to reduce emissions throughout the State of California, and to improve and protect the health and quality of life of all Californians.

Sincerely,

Richard Carrion

cc: Members of the Board
Mr. James Goldstene

September 18, 2009

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



metrochamber

SACRAMENTO METROPOLITAN
CHAMBER OF COMMERCE

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

Dear Ms. Nichols, Members of the ARB, and Mr. Goldestene:

On behalf of the Sacramento Metro Chamber, I would like to take the opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September 23, 2009 board meeting. The Metro Chamber strongly believes that an incentive-based program, aimed to maximize the emissions efficiency benefits of rail transportation, is the most effective way to yield pollutant emission benefits.

The Metro Chamber recognizes that we all need to take responsibility and work together to improve air quality to ensure that our region and the state of California meet federal air quality standards. Additionally, we need to be prudent about the way in which we implement and achieve emission reduction goals, especially in a down economy. It is our belief the best way to achieve improved air quality and emission reduction goals is through incentive-based programs and voluntary agreements that generate positive results without placing onerous regulations on industry and the business community.

Transporting goods by rail is important both regionally and nationally, as it helps to reduce green house gasses and improves freeway congestion by removing large trucks from the roads. 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. Additionally, rail transportation plays a vital role in international trade, which is a critical economic engine in our state and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

The Sacramento Metro Chamber is the largest, oldest and most prominent voice of business in the greater Sacramento area. Representing nearly 2,300 member businesses and business organizations in the six county Sacramento region, the Sacramento Metro Chamber serves as the region's leading proponent of regional cooperation and primary advocate on issues affecting business, economic development and quality of life.

Again, on behalf of the Metro Chamber, I respectfully urge the California Air Resources Board to pursue an incentive program, necessary to maximize the emissions efficiency benefits of rail transportation.

Sincerely,

Matthew R. Mahood
CEO/President

2009 Chair
Linda Cudler
Vice President, Corporate Communications
GenCorp, Inc.

1st Vice Chair
Randy Sater
Senior Vice President
Teichert Land Co.

2nd Vice Chair
Greg Eldridge
Vice President, Area Manager
CH2M-Hill

Vice Chair, Economic Development
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CirclePoint/MMC Communications

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Vice Chair, Public Policy
Robert Dugan
Legislative & Public Affairs
Granite Construction, Inc.

Vice Chair, Small Business
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Harvego Enterprises

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Intel Corporation

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Principal
Griseida's Ventures
Christopher Delfino
Partner
Downey Brand, LLP

Kris Deutschman
President
Deutschman Communications Group
Shelly Schlenker
Vice Presidents, Public Policy & Advocacy
CH2M/Mercy

Metro PAC Chair
Michelle Smira
Principal
MMS Strategies

Legal Counsel
Martha Lofgren
Partner
Brewer Lofgren

Treasurer
Warren Kashiwagi
Partner
Perry-Smith, LLP

President & CEO
Matthew R. Mahood
Sacramento Metro Chamber



MIRATECH
CORPORATION

EMISSIONS SOLUTIONS
FOR INDUSTRIAL ENGINES

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:

MIRATECH Corporation appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. MIRATECH Corporation agrees with 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. Any action by CARB should preserve 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 document, "*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.*" 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

William B. Clary

CEO, MIRATECH Corporation

cc: Members of the Board

Mr. James Goldstene



4600 Apple Street
Boise, ID 83716

Phone: 208.947.4800
Fax: 208.947.4820
Toll Free: 1-800-272-7702
www.wabtec.com

September 22, 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:

MotivePower Inc. appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. The MotivePower 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. Any action by CARB should preserve 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 document, "*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.*" 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Eelman", with a stylized flourish at the end.

Gary Eelman
Vice President – Sales, Marketing & Customer Service

cc: Members of the Board
Mr. James Goldestene



Elizabeth Warren
Executive Director
Berth 77, P 7-A, Ports O' Call
San Pedro, CA 90731
www.FuturePorts.org

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Western States Petroleum
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Coalition for America's
Gateways & Trade Corridors

County of San Bernardino Economic
Development Agency

Inland Empire Economic Partnership

Long Beach Area
Chamber of Commerce

Los Angeles Area
Chamber of Commerce

Los Angeles County
Business Federation

Pasadena Chamber of Commerce

Regional Hispanic
Chamber of Commerce

San Gabriel Valley Economic
Partnership

Valley Industry & Commerce
Association

Wilmington Chamber of Commerce

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:

On behalf of FuturePorts, 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 ARB board meeting on September 25th.

Representing a broad spectrum of the businesses in the Southern California goods movement supply chain, FuturePorts recognizes the San Pedro Bay Ports as regional assets, and advocates for balance between economic growth and environmental stewardship.

FuturePorts urges Board to maintain the efficiency of the goods movement system by implementing ARB staff's recommendation to pursue an incentive program to maximize the emissions reductions from locomotives throughout the state. Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion for certain key moves as a part of the goods movement system. 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 ARB preserves the efficiency of the system as a whole, and further reduce emissions within that context.

ARB and the San Pedro Ports have had significant success with incentive programs to reduce emissions in partnership with international trade industries. Pursuing the incentive program will allow ARB 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).



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

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth Warren".

Elizabeth Warren
FuturePorts

cc: Members of the Board
Mr. James Goldstene

NAIOP

COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION

SoCal Chapter

September 23, 2009

Sent via facsimile to (916) 327-5621 and electronically at www.arb.ca.gov

Mary Nichols, Chair
Members of the Board
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 and Board Members:

The SoCal Chapter of NAIOP, the Commercial Real Estate Development Association, values the opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the ARB Board Members on the September 25th.

NAIOP is the leading organization for developers, owners and related professionals in office, industrial and mixed-use real estate, with nearly 950 members in the SoCal Chapter covering the Southern California regions of Los Angeles and Orange Counties. As such, NAIOP SoCal agrees ARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

CARB has had significant success with past incentive programs and enforceable agreements with the railroads and other international trade emissions sources. For example, ARB's staff has estimated that federal standards and state regulations of other rail yard sources (e.g. cargo handling equipment), as well other agreements with the railroads will result in diesel PM emissions reductions of "about one-third by 2010, about half by 2015, and about two-thirds by 2020" (Recommendations, pg. 5). 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. As ARB Staff points out on page ES-3 of their Recommendations, pursuing the incentive program will allow ARB to achieve their goal of reducing DPM from goods movement sources 85% by 2020.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. Railroads and other industries have experienced a 20-30% reduction in California business activities in this recession. 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. An incentive program preserves competitiveness and efficiency of the goods movement

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NAIOP SoCal EXECUTIVE STAFF

Cynthia G. Fusco, Executive Director

Vickie Talley, Director of Legislative Affairs

September 23, 2009
Page 2

system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in cursive script that reads "Vickie Talley".

Vickie M. Talley
Director of Legislative Affairs



GE Transportation

Peter J. Lawson
Product Manager
North American Freight Locomotives

2901 East Lake Road, Building 14-4
Erie, PA 16531
USA

T (814) 875 - 6603
F (732) 352 - 7908
pete.lawson@trans.ge.com

September 22, 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 Rail Yard Emission Reductions

Dear Chair Nichols:

GE Transportation, a leading locomotive and rail equipment manufacturer, 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 Board Members at the September board meeting.

Over an eight-year period, GE has invested more than \$400 million to develop and bring to market the Evolution® Series locomotive and other emission reducing products. The Evolution Series is the top-selling locomotive that meets or exceeds current U.S. EPA Tier II locomotive emissions standards. By the end of 2009 GE will have built and shipped more than 3,500 Evolution Series locomotives – the majority of which were delivered to Union Pacific and BNSF Railway. In addition to embracing these new locomotives, and thereby accelerating the retirement of older generation locomotives, Union Pacific and BNSF Railway continue to purchase additional hardware and software solutions developed by GE and other industry original equipment manufacturers to ensure that their railroad operations are functioning with the environment in mind.

GE Transportation agrees that ARB should promote an incentive program to maximize the emissions efficiency benefits of rail transportation.

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. Rail transport burns only one gallon of fuel to move one ton of freight in excess of 430 miles. Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs and reduces freeway congestion. Any action by ARB, therefore, should work to preserve the efficiency of the rail transportation system and should continue to reduce emissions within that context.

Moreover, ARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources. For example, the Recommendations document states (Page 5): "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, etc), as well other agreements with the railroads. Additionally, ARB states existing projections might 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 enable ARB to achieve its goal of reducing DPM from goods movement sources 85% by 2020. Full implementation of the proposed locomotive measures in the staff's recommendations (Page ES-3): "translates to a 65-percent reduction in potential cancer risks in communities surrounding rail yards by 2015 and 85-percent reduction by 2020."

International trade also is vital to the California economy and must be allowed to thrive, especially in challenging economic times. An incentive program preserves competitiveness and efficiency of the goods-movement system while driving down emissions to protect employees' and residents' health.

Today, GE is developing a number of new emissions-reducing technologies at our Global Research Center that will benefit the railroad and other industries for decades to come. These technologies require a substantial investment to develop and, accordingly, a significant capital investment on behalf of the railroads. But all parties recognize and support the importance of this investment in the future. One such technology is GE's mainline heavy-haul Hybrid locomotive. Union Pacific and BNSF Railway both serve on our technical-advisory council that is working to introduce hybrid technology to the railroad industry to further reduce emissions and improve fuel efficiency.

I would like to close by reaffirming General Electric's commitment to help the railroad industry solve its most pressing environmental issues.

Thank you for allowing GE to comment on this pressing issue. GE looks forward to working with its railroad partners to further reduce emissions in California as well as over the entire railroad network.

Regards,



Peter J. Lawson
Product Manager - North American Freight Locomotives

cc: Members of the Board
Mr. James Goldestene



September 21, 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 Rail Yard Emission Reductions

Dear Chair Nichols:

The Roseville Chamber of Commerce 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 board members at the September board meeting. The Roseville 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. Any action by CARB should preserve 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 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. 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 rail yards 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink that reads "Wendy A. Gerig". The signature is written in a cursive, flowing style.

Wendy A. Gerig
CEO
Roseville Chamber of Commerce

cc: Members of the Board
Mr. James Goldestene

JOHNSON MATTHEY INC.
400 LAPP ROAD SUITE 200 MALVERN PA 19355-1212
T +1 484 320 2136 F +1 484 320 2152



September 21, 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:

Johnson Matthey appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. Johnson Matthey agrees with CARB's preferred approach of pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation. From our extensive experiences with on and off road engine exhaust emissions reduction efforts, we have found that technical advancements to reduce exhaust emissions are best achieved in a collaborative atmosphere between the end user and technology provider. Incentive programs encourage improved collaboration with well defined goals and objectives leading to outcomes that are mutually beneficial to industry and the public.

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. Any action by CARB should preserve 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 document, *"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."* 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,



Steve Clark

Stationary Emissions Control Group

Johnson Matthey Catalyst

clarksd@jmus.com

cc: Members of the Board

Mr. James Goldestene





The California Trade Coalition

A Coalition Working to Keep California Competitive in a Global Economy

APL Ltd.

Associated General
Contractors of California

California Association
of Port Authorities

California Business
Properties Association

California Business
Roundtable

California Chamber
of Commerce

California Manufacturers
& Technology Association

California Nevada Cement
Promotion Council

California Railroad Industry

California Retailers
Association

Consumer Electronics
Association

Grocery Manufacturers
Association

Industrial Environmental
Association

International Council
of Cruise Lines

International Council
of Shopping Centers

Matson Navigation Company

Maersk Inc.

Pacific Merchant
Shipping Association

Retail Industry Leaders
Association

Society of the
Plastics Industry

SSA Marine

Western Home
Furnishings Association

Western States
Petroleum Association

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 California Trade Coalition (Cal Trade) appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. Cal Trade 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. Any action by CARB should preserve 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 document, "*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.*" 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. 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.



The California Trade Coalition

A Coalition Working to Keep California Competitive in a Global Economy

American Chemistry Council

APL Ltd.

Associated General
Contractors of California

California Association
of Port Authorities

California Business
Properties Association

California Business
Roundtable

California Chamber
of Commerce

California Manufacturers
& Technology Association

California Nevada Cement
Promotion Council

California Railroad Industry

California Retailers
Association

Consumer Electronics
Association

Grocery Manufacturers
Association

Industrial Environmental
Association

International Council
of Cruise Lines

International Council
of Shopping Centers

Matson Navigation Company

Maersk Inc.

Pacific Merchant
Shipping Association

Retail Industry Leaders
Association

Society of the
Plastics Industry

SSA Marine

Western Home
Furnishings Association

Western States
Petroleum Association

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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Should you have any questions or comments, please contact Michelle Rublicava at 916-444-7158.

cc: Members of the Board

Mr. James Goldestene



September 21, 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 Lincoln Area Chamber of Commerce appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. The Lincoln Area Chamber of Commerce 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. Any action by CARB should preserve 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 document, "*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.*" 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,
Lincoln Area Chamber of Commerce

Tina McCauslin, President

Bob Romness, CEO

cc: Members of the Board
Mr. James Goldestene



Strengthening the Voice of Business

September 24, 2009

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

Re: SUPPORT ARB Staff Draft Recommendation for Incentive Program to Further Reduce Locomotive and Railyard Emission Reductions (Agenda Item 09-8-5)

Dear Chair Nichols:

On behalf of the Los Angeles County Business Federation, we are writing to urge the Board follow its staff recommendation at its September 25th meeting to pursue an incentive program to maximize emissions reductions from locomotives throughout the state.

BizFed – which has 70 member organizations representing well over 100,000 businesses across Los Angeles County – is an ardent advocate of improving regional and statewide transit efforts and pollution-reduction efforts. BizFed members have ranked transportation issues among their top concerns for more than a year now.

Transporting goods by rail yields critical pollutant-emission benefits, reduces greenhouse gasses, and improves freeway congestion in vital areas as part of an efficient and comprehensive statewide goods-movement system. As a key component of California's increasingly clogged and critical transit system, any action on reducing rail emissions should weigh improving efficiencies within the entire system.

In addition, rail transport plays a key role in the state's massive international trade system, which is a vital economic engine for California and must be allowed to thrive - especially in tough economic times - without undue regulatory burdens. An incentive program that preserves business competitiveness and the efficiency of the national goods-movement system will serve to drive down emissions faster.

BizFed supports such incentive plans, noting that ARB has had significant success with previous incentive programs and enforceable MOU agreements with the railroads and other international trade stakeholders. Full implementation of the proposed locomotive measures in the staff's draft recommendations will translate into "a 65 percent reduction in potential cancer risks in communities surrounding railyards by 2015 and 85 percent reduction by 2020" (Page ES-3).

BizFed respectfully urges you consider this request, and support an incentive program to maximize emissions reductions from rail transport across the state.

Sincerely,

A handwritten signature in black ink, appearing to be "Holly Schroeder".

A handwritten signature in black ink, appearing to be "David Fleming".

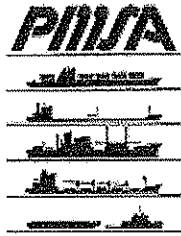
A handwritten signature in black ink, appearing to be "Tracy Rafter".

Holly Schroeder, BizFed Chair
Building Industry Assoc.

David Fleming, BizFed Founding Chair
Latham & Watkins

Tracy Rafter, BizFed CEO
Rafter Group, Inc.

Cc: Members of the Board; Mr. James Goldstene



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



September 21, 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 Chairwoman Nichols:

The California Chamber of Commerce (CalChamber) appreciates this opportunity to comment on the California Air Resources Board (CARB) staff Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions. CalChamber agrees that 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 greenhouse gas emissions (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. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

Pursuing the incentive program will allow CARB to achieve their goal of reducing diesel emissions from goods movement sources 85% by 2020. Full implementation of the proposed locomotive measures will also translate into a 65 percent reduction in potential cancer risks in communities surrounding railyards by 2015 and 85 percent reduction by 2020. CARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources. CARB staff estimates that diesel 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.

International trade is a vital economic engine in California and must be allowed to thrive, especially during tough economic times. Rail freight movement of goods around the state is an essential part of California's integration into the global economy. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

Robert Callahan
Policy Advocate

RC:fg

1215 K Street, Suite 1400
Sacramento, CA 95814
916 444 6670
www.calchamber.com



PORT OF OAKLAND

OMAR R. BENJAMIN
Executive Director

September 22, 2009

Ms. Mary Nichols
Chair
California Air Resources Board (ARB)
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 Ms. Nichols:

The Port of Oakland (Port) appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* that is being presented to the ARB Board members at the September 2009 Board meeting.

The Port owns, manages and markets seaport facilities on San Francisco Bay and the Oakland Estuary. The seaport ranks among the top five in the nation and 20th in the world in terms of annual container traffic. In support of our tenants and customers, Port staff is keenly interested in the comprehensive maritime industry air quality emissions reduction efforts that have been initiated by ARB through their regulatory program. We particularly appreciate the consistent and clear program to reduce diesel emissions statewide, backed up by incentive funding to assist businesses in meeting or exceeding the schedule deadlines.

Therefore, the Port urges the California Air Resources Board to implement its staff recommendation to pursue an incentive program to maximize the emissions reductions from locomotives throughout the state. Rail is a key component of the goods movement system at the Port, in California, and across the nation, and is the most environmentally sound way to move goods over land. Any action by ARB should preserve the efficiency of the logistics system as a whole, and should continue to reduce emissions within that context.

In support of this approach, the Port is currently working with the railroads and the Bay Area Air Quality Management District to use incentive funds, paired with private investment, to bring two clean burning ULEL switch locomotives to the Port's intermodal rail yard currently operated by BNSF Railway. We anticipate these locomotives will be operating at the Port in 2010.

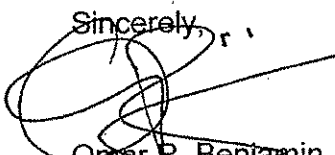
Pursuing an incentive program will allow ARB to achieve its goal of reducing DPM from goods movement sources by 85% by 2020. Full implementation of the proposed

locomotive measures in the ARB staff's recommendations translates to a 65 percent reduction in potential cancer risks in communities surrounding railyards by 2015 and 85 percent reduction by 2020¹.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Thank you for your consideration.

Sincerely,



Omar R. Benjamin
Executive Director

¹ Pg. ES-3 of the ARB's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions*



ROSEVILLE
CHAMBER *of*
COMMERCE

SERVING ROSEVILLE AND GRANITE BAY

September 21, 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 Rail Yard Emission Reductions

Dear Chair Nichols:

The Roseville Chamber of Commerce 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 board members at the September board meeting. The Roseville 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. Any action by CARB should preserve 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 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. 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 rail yards 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink that reads "Wendy A. Gerig". The signature is written in a cursive, flowing style.

Wendy A. Gerig
CEO
Roseville Chamber of Commerce

cc: Members of the Board
Mr. James Goldestene



9301 West 55th Street
La Grange, IL 60525

September 22, 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:

Electro-Motive Diesel, Inc. (EMD) appreciates the opportunity to comment on the ARB Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions being presented to the Board Members at their September meeting. EMD agrees that ARB's preferred approach should be the pursuit of an incentive program to maximize the emissions efficiency benefits of rail transportation.

With a history stretching back to 1922, EMD is one of two U.S. original equipment manufacturers of diesel-electric locomotives. The company designs, manufactures and sells locomotives for all commercial railroad applications, and has sold its products in more than 70 countries. Since 2005 the Tier 2 certified SD70M-2 and SD70ACe freight locomotives have been EMD's flagship models. They were joined last year by the 710ECO™ Repower Tier 2 solution for older freight locomotives and most recently unveiled in Sacramento by Caltrans for the first of its passenger locomotives. EMD is continuing comprehensive research and development activities to meet Tier 3 and Tier 4 emissions standards for future locomotive models.

The sustained success of companies like EMD is wholly dependent upon a growing, vibrant, and competitive rail transportation system. Developments in this sector support a variety of President Obama's goals, including: facilitating more efficient travel, increasing jobs, reducing hydrocarbon emissions from transportation sources, increasing economic competitiveness, and reducing dependence on foreign oil.

Transporting goods by rail reduces criteria pollutant levels, reduces greenhouse gases, and reduces 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. Any action by CARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

CARB has a strong record of success with past incentive programs and enforceable agreements with both the railroads and other international trade emissions sources. On Page 5 of the Recommendations document, 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." These reductions result from federal standards and state regulations of other railyard sources (such as cargo handling equipment), as well as agreements with the railroads. 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 its goal of reducing DPM from goods movement sources by 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).

A strong freight rail transportation system is a boon to California's domestic and international trade, providing a vital economic engine that must be allowed to thrive, especially in difficult economic times. An incentive program such as that recommended by ARB preserves the competitiveness and efficiency of the goods movement system, while continuing to drive down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. Hamilton". The signature is fluid and cursive, with a long horizontal stroke at the end.

John S. Hamilton
President and CEO
Electro-Motive Diesel, Inc.

9301 W. 55th Street
La Grange, IL 60525

708-387-6662 – office
John.S.Hamilton@EMDiesels.com

cc: Members of the Board
Mr. James Goldestene



3700 Rocklin Road
Rocklin, CA 95677
(916) 624-2548

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 Rocklin Area Chamber of commerce appreciates this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented to the Board Members at the September board meeting. The Rocklin Area Chamber of Commerce agrees CARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

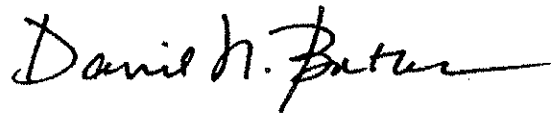
Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion. Rail is the most environmentally sound way to move goods over land and is a key component of the goods movement system in California and across the nation. Any action by CARB should preserve 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 document, "*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.*" 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. 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. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California.

Sincerely,

A handwritten signature in black ink, reading "David N. Butler". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

David N. Butler
Chair, Rocklin Area Chamber of Commerce
Government Relations Committee

cc: Members of the Board

 Mr. James Goldestene



September 23, 2009.

Ms. Mary Nichols
Chair person
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 Ms. Nichols and other members of CARB's board, ARB members, and Mr. Goldestene:

GSC Logistics is the largest third party logistics entity, operating through the Port of Oakland, managing over 150K FEU's yearly for a variety of retailers and BCO's. We want to offer our opinions on ARB's Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions presented to the Board Members at the September meeting. GSC Logistics totally agrees that CARB's preferred approach should be pursuing an incentive program to maximize the emissions efficiency benefits of rail transportation.

Transporting commodities by rail yields criteria pollutant emission benefits, reduces GHGs, and improves freeway congestion. Rail is an environmentally sound way to move commodities over land and a key component of goods movement in California and throughout the U.S. Any action by CARB should preserve the efficiency of the system and should continue to reduce emissions within that context.

Moreover, CARB has had significant success with past incentive programs and voluntary agreements with the Railroads and other international trade emissions sources. On page 5 of the Recommendations draft, "staff estimates that diesel PM emissions from all sources at railyards will be reduced by 1/3 by 2010, roughly 1/2 by 2015, and 2/3 by 2020, event with a strong projected growth in rail operations." The reductions reflect the voluntary agreements with the railroads in combination with federal standards and state regulations of other rail yard sources (such as cargo handling equipment). Also, ARB states existing projections may overestimate growth in the next 5-10 years, given the current recession resulting in lower emissions in the near term.

The incentive program will help California achieve their goal of reducing DPM from goods movement sources 85% by 2020. Implementation of the proposed locomotive measures in the staff's Recommendations will yield 65% reduction in potential cancer risk for communities surrounding railyards by 2015 and 85% by 2020.

International trade is the economic engine for California and needs to be allowed to thrive, especially in tough economic times. An incentive program induces competitiveness and efficiency of the goods movement system, while reducing emissions to benefit employees' and resident's health in California.

Please accept our gratitude for the opportunity to present our comments to the decision making process currently under way and to you.

Respectfully
Andres L. Garcia
Chairman of the Board
Executive Vice President
GSC Logistics
530 Water Street, 5th floor
Oakland, Ca. 94607



Bay Planning Coalition

Celebrating 25 Years of Leadership

Ellen Joslin Johnck
Executive Director

September 24, 2009

BOARD OF DIRECTORS

Michael Giari, President
Port of Redwood City

Rick Rhoads, Vice-President
Moffatt & Nichol

Philip Lebednik, Secretary-Treasurer
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William Butler
Hanson Aggregates,
Northern California

Paul Campos
Home Builders
Association of N. California

Claude Corvino
Nichols Consulting Engineers

Peter Dailey
Port of San Francisco

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The Dutra Group

James Fiedler
Santa Clara Valley Water District

Greg Gibeson
Pacific Inter-Club Yacht Association

Roberta Goulart
Contra Costa County Water Agency

Bill Hanson
Great Lakes Dredge & Dock, Inc.

Eric Haug
Manson Construction Co.

Eric J. Hinzl
Kennedy/Jenks Consultants, Inc.

David W. Jefferson
Burdell Ranch Wetland
Conservation Bank

Gary M. Levin
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James D. Levine
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Paul Shepherd
Cargill Salt

Richard Sinkoff
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Scott D. Warner
AMEC Geomatrix

Daniel Woldesenbet
Alameda County Public
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The Honorable Mary Nichols
Chairperson and Board Members
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 Ms. Nichols, members of the ARB, and Mr. Goldestene:

The Bay Planning Coalition (BPC) welcomes this opportunity to comment on the ARB staff's *Draft Recommendations to Implement Further Locomotive and Railyard Emission Reductions* being presented at the September Board meeting.

BPC is nonprofit organization leader in building coalitions and consensus on the issues facing the Bay-Delta region. Our members include a wide array of industry, associations, and local governments. Our mission is to ensure that commerce, recreation and the natural environment thrive in the San Francisco Bay-Delta region. BPC promotes sound planning for resource sustainability and balancing the needs for economic vitality, job generation, and environmental protection. We have been involved in planning for air quality improvement and air emissions reduction in the maritime industry and related goods movement industries, among several other Bay environmental programs.

We have long advocated for environmental solutions that make business sense. To this end, we urge the Board to maintain the efficiency of the goods movement system by implementing incentive programs for emission reduction in all components of the goods movement system.

To this end, we support CARB's recommendation to pursue an incentive program to maximize the emissions reductions from locomotives throughout the state. Transporting goods by rail yields criteria pollutant emission benefits, reduces GHGs, and reduces freeway congestion. Moving goods by rail is the most environmentally sound mode to move goods over land and is a key component of the goods movement system in California and across the nation. Actions by CARB should preserve the efficiency of the system as a whole and should continue to focus emissions reduction within that context.

Moreover, CARB has had significant success with past incentive programs and voluntary agreements with the Railroads and other international trade emissions sources. On Page 5 of the Recommendations document, "*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." These reductions result from the voluntary agreements with the railroads in combination with federal standards and state regulations of other rail yard sources (such as cargo handling equipment). Additionally, ARB states existing projections may overestimate growth in the next 5-10 years given the current recession resulting in lower emissions in the near term.

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*¹.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. An incentive program preserves competitiveness and efficiency of the goods movement system, while driving down emissions to protect employees' and residents' health in California. It is an environmental solution that makes business sense.

Sincerely yours,

Ellen Joslin Johnck

Executive Director