



September 23, 2009

Barbara Riordan
Board Member
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 Board Member Riordan:

The Los Angeles Area Chamber of Commerce 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 September 25th. As the largest and most influential business association in Los Angeles County, the Los Angeles Area Chamber of Commerce ("the Chamber") is the voice of business in our region. As such, 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 for certain key moves as a part of the Goods Movement system. Any action by ARB should preserve the efficiency of the system as a whole, and should continue to reduce emissions within that context.

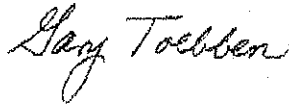
Moreover, ARB has had significant success with past incentive programs and enforceable agreements with the Railroads and other international trade emissions sources:

- ARB estimates emissions at rail yards will be reduced over 55% by 2015 and by over 66% by 2020;
- These reductions result from federal standards and state regulations of other rail yard sources as well enforceable agreements with the railroads;
- Existing projections may overestimate growth in the next 5-10 years given the current recession, resulting in lowered emissions dramatically for the foreseeable future;

- 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 for the greater Los Angeles Area 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. An incentive program preserves business competitiveness and the efficiency of the national goods movement system, while driving down emissions in the greater Los Angeles area.

Sincerely,



Gary Toebben
President & CEO