

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