

Faye Thomas

From: Al Sattler [REDACTED]
Sent: Friday, July 26, 2024 4:49 PM
To: COB; Ian MacMillan; Elaine Shen
Subject: [EXTERNAL] Comment on Proposed Rule 2306 – Freight Rail Yards

Chair Delgado and Members of the Governing Board

South Coast Air Quality Management District

(by email)

cc:

Ian MacMillan

Assistant Deputy Executive Officer

Elaine Shen

Planning and Rules Manager

RE: Proposed Rule 2306, Freight Railyard Indirect Source Rule (ISR)

Dear Chair Delgado and Members of the Board:

I urge you to pass a strong Freight Railyard Indirect Source Rule (ISR), stronger than the Draft, in order to protect the health of people, and, indeed, of all life in the South Coast Air Basin. After decades of work, people in the South Coast Air basin are still suffering from smog. Children with asthma are miserable, and their parents suffer economic impacts from time lost from work. Discussions of health impacts of smog usually focus on human health, but we would do well to remember that other animals also suffer from bad air. In addition to their fellow humans, people care about their dogs, cats, and horses, as well as wildlife. Ozone can also have negative impacts on plants, and can have a negative economic impact on agriculture. Trees in National Forests suffer from smog and can become more susceptible to insect attacks, and thereby more subject to fire. Calculating the economic benefit of reduced smog based only upon human health benefits is therefore an underestimate.

If this Rule functions as intended, it will substantially reduce emissions of nitrogen oxides, NOx, to the air basin, reducing photochemical smog, ozone. The negative impacts of NOx and resulting ozone tend to be wide-spread. Another health impact of freight railyards is diesel particulate, which has its greatest concentration, and therefore impact, close to the sources. Since most of the freight railyards are located near lower socioeconomic communities, this concentration of carcinogenic diesel particulates constitutes an environmental injustice. It is unfortunate that this Rule does not also address diesel particulates. However, hopefully diesel particulates will also be reduced as NOx emissions are reduced.

Apparently the draft Proposed Rule 2306 was recently amended to make optional the consideration of movement of empty containers. The language change from "including" to "which may include" "empty containers and chassis" seems unwarranted. Moving empty containers still requires energy, and would presumably still produce the same kind of air pollution, although a lesser quantity, as that produced by moving loaded containers.

Zero-emission propulsion has the appeal of potentially reducing emissions of greenhouse gases, assuming greatly increased generation of renewable energy. However, exhaust gas treatment is another way to reduce smog. Present diesel freight trucks in the LA Basin are substantially cleaner than most diesel locomotives. Using similar technology on diesel freight locomotives for NOx removal and diesel particulate filtering as is used on diesel freight trucks would achieve great pollution reduction, and might well be less expensive, more certain, and faster to implement, since it would not require extensive infrastructure upgrades. Ultimately, however, goods movement needs to stop using fossil fuels, to stop increasing global warming.

Sincerely,

Alfred Sattler