

Comments ARB Technology and Fuels Assessment Overview due 12.30.2015

You state:

Reducing emissions of PM2.5, and minimizing near-source exposures to diesel PM and associated health risks near distribution centers, rail yards, and ports, many of which impact disadvantaged communities.

And

Cap-and-Trade Auction Proceeds Low Carbon Transportation Investments:
The State's share of the auction proceeds generated through ARB's Cap-and-Trade Program provide a new funding source for projects that support efforts to reduce greenhouse gas emissions and accelerate the transition to low carbon freight and passenger transportation, with a priority for disadvantaged communities. The fiscal 2014-15 State budget appropriated \$200 million in auction proceeds to ARB for Low Carbon Transportation projects to expand existing zero-emission car and hybrid and zero-emission truck and bus incentive programs, as well as provide incentives for the pre-commercial demonstration of advanced freight technology to move cargo in California, which will benefit communities near freight hubs.

Comments:

Disadvantaged Communities are emphasized, yet the Greenhouse Gas Reduction Fund gears investments that reduce greenhouse gases without any substantiation. There appears to be an assumption that buses will contribute to the reductions, but increased congestion is never addressed due to density. There are not the studies to substantiate any reduction of emissions without complete studies of the traffic, including automobiles.

Rail yards, especially maintenance, and ports can produce continuous emissions that do not offset carbon reductions in disadvantaged communities. Rail yards need to include passenger rail. Studies need to be conducted for Health Risk Assessments and a reality check on issues.

Housing investments to reduce greenhouse gas emissions may have NO EFFECT in areas with high diesel emissions from rail or ports.

You state:

vii. Potential Reductions from Locomotives

*Locomotives are a good example of an off-road technology where additional reductions are possible. **Locomotives are projected to meet Tier 4 standards***

without the use of a PM filter or SCR technologies. The use of these after-treatment technologies is possible but is not required under current federal regulation. Natural gas is seen as a potential alternative to diesel when diesel prices are high, but without lower emissions standards natural gas is unlikely to provide a substantial criteria pollutant or GHG benefit. Emissions benefits would depend on the criteria pollutant certification level of the engine, the efficiency of the engine, and upstream emissions associated with natural gas, including leakage. Other technologies such as battery tender or fuel cells in a tender or in a locomotive may be possible, but have not yet been demonstrated. Some technologies can capture emissions at rail yards from idling locomotives, providing emissions reductions in disadvantaged communities.

Comments:

There is no timeline or sense of reality of any reductions of emissions and increased air quality.

Comments:

Neglected are any methane emissions in areas with closed oil wells, landfills and natural gas storage. Porter Ranch is an issue that should be addressed in other areas of the State. The Fairfax area of Los Angeles shows emissions, as well, but is less publicized.

Air Quality will not improve without a realistic approach to the identification of sources.

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