

From: Susan Mudd [mailto:SMudd@elpc.org]  
Sent: Tuesday, September 05, 2017 5:23 PM  
To: Info <Info@cmap.illinois.gov>  
Subject: "CMAQ/TAP-L Proposed Programs Public Comment" (#DR 18184319)

To Whom it May Concern:

The Environmental Law & Policy Center is disappointed by the current direct diesel emission reduction CMAQ project proposed by Metra (#DR 18184319) now part of the recommended program, and strongly encourages additional provisions for the project to ensure the highest air quality and health benefits are achieved using CMAQ funding. The project does not go far enough in preventing diesel emissions, and can and should be improved to increase the health benefits achieved by applying tighter emission standards to locomotive engines. The project should commit to utilizing the highest EPA locomotive engine emissions Tier standards, eg Tier 4, for the 16 locomotives Metra wishes to obtain utilizing CMAQ funding.

Current minimal EPA standards for new locomotives, which became effective in 2015, are Tier 4. Local examples of locomotives already meeting these tighter and more protective emission limits are visible. The Amtrak fleet operating in Illinois started taking delivery of the first of 33 new Tier 4 locomotives this past month. Union Station, which Metra serves in concert with Amtrak, is a covered nearly-enclosed and incredibly busy station that has consistently recorded extremely poor air quality readings driven almost exclusively by locomotive exhaust. High readings have also been recorded inside Metra trains, affecting riders every day. Tier 4 locomotive engines, which meet fine particulate matter standards 70 percent tighter than EPA Tier 2 or Tier 3 standards, are readily available.

Metra states in its proposal plans to obtain "fully remanufactured condition" locomotives that exceed the mandated emissions levels for their age group and which will "include new or remanufactured prime movers." If Metra has already stated the probable action of obtaining new engines - which would meet Tier 4 standards -this should be clearly stated as a commitment. CMAP and the committees charged with evaluating CMAQ projects and funding a final approved program should make it clear that Tier 4 is the goal Metra must meet.

We understand many older Metra locomotive engines have been 'remanufactured' to Tier 0+ standards using Metra resources. That is the minimal legal standard required for remanufactured engines that are taken apart and put back together replacing worn or defective parts. Yet despite it being several years since Metra signed Tier 0+ upgrade contracts, it appears Metra is not firmly committed to achieving a better/tighter emissions standard. Even in the CMAQ proposal, Metra merely states that it "would aim to get at least Tier 2+ / Tier 3 engines." Utilizing engines manufactured to a much less stringent pollution standard is vastly

different from using new or refurbished engines manufactured or rebuilt to the highest possible standard already available. Metra must follow the latter path.

Metra's fleet of locomotives is extremely old, and many are extremely polluting. Running in densely populated corridors and carrying passengers, the pollution affects many people on and adjacent to trains. Given the durable construction of and long lifetime expectancies for diesel locomotives any additional locomotives Metra obtains will likewise be in use for decades. Decisions impacting emissions upgrade projects undertaken now or in the near future will have air pollution and health impacts - positive or negative - reaching far into the future. This is a historic moment to make the right decision. We request that the project, and Metra, be held to a higher standard and that locomotives obtained with CMAQ funds be required to meet the emission Tier goals for what the U.S. EPA calls "refurbished" locomotives - Tier 4 emission standards.

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