The Association of American Railroads (AAR) and the American Short Line and Regional Railroad Association (ASLRRA), on behalf of themselves and their member railroads,\(^1\) submit these comments in response to the Environmental Protection Agency’s (EPA) Draft Methodologies for Estimating Port-Related and Goods Movement Mobile Source Emission Inventories. Railroads have a significant interest in the draft Methodologies for Estimating Port-Related and Goods Movement Mobile Source Emission Inventories. The Class 1 railroads\(^2\) in the US (all of which are AAR members) have been collaborating with the Eastern Regional Technical Advisory Committee (ERTAC) since approximately 2008 on tools and methods that can be used to prepare national emissions inventories. The railroads would like to make the following three points:

- The railroads disagree with EPA’s preference for train counts over gross ton-miles for estimating line-haul locomotive activity. ERTAC has found that the

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1 AAR is a non-profit trade association, representing freight railroads that operate 83 percent of the line-haul mileage, employ 95 percent of the workers, and account for 97 percent of the freight revenues of all railroads in the United States. AAR also represents passenger railroads that operate intercity passenger trains and provide commuter rail service. AAR is the nation’s leading railroad policy, research, standard setting, and technology organization. AAR and its members are committed to operating the safest, most efficient, cost-effective, and environmentally sound rail transportation system in the world. ASLRRA is a non-profit trade association representing the interests of approximately 600 short line and regional railroad members and railroad supply company members in legislative and regulatory matters. Short lines operate 47,500 miles of track in 49 states, or approximately 29% of the national freight network, touching in origin or destination one out of every five cars moving on the national railroad system, serving customers who otherwise would be cut off from the national railroad network.

2 The Surface Transportation Board, the federal agency responsible for regulating railroad rates and service classifies railroads by their operation revenue. Class 1 railroads generate 489.94 million or more in revenue in 2018.
number of train movements do not correlate nearly as well to locomotive fuel use and emissions as gross ton-miles.

- On page 122, EPA states that uncontrolled line-haul emission factors should be used by default for Class II/III locomotives. According to Railinc\(^3\) data that ERTAC used for the 2016/2017 inventories, only 48.4% of the Class II/III locomotive fleet consist of pre-1973 locomotives with uncontrolled emission rates. Using uncontrolled line-haul emissions overestimates the emissions from Class II/III locomotives.

- The year-by-year emission factors (EF’s) listed in Tables 8.5 and 8.6 are based on the 2009 Office of Transportation and Air Quality (OTAC) document. These EF’s are overly aggressive in their basic assumptions on changes in fleet mix when compared to the data that ERTAC Rail has collected from the Class I railroads for the 2007-2008, 2014, 2016, and 2017 emission inventories. OTAC should update their 2009 document to account for what has actually occurred over the past 11 years and adjust their future year predictions accordingly. The disparities between the 2009 OTAC predictions and reality will only get worse over time if this is not corrected.

The railroads thank EPA for considering their comments.

Respectfully submitted,

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\(^3\) Railinc is a wholly owned subsidiary of AAR. Railinc’s mission is to create valued solutions for rail industry problems using our people, processes and technologies. Railinc manages a wide variety of data for the rail industry, including the number and type of cars and locomotives used by the industry.