

**Congress of the United States**  
**Washington, D.C. 20510**

November 13, 2024

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Board Members:

We write regarding the “In-Use Locomotive Regulation” submitted pursuant to section 209(e) of the federal Clean Air Act. To be clear, we strongly support the State of California’s ability under federal law to set its own air quality standards to protect public health by reducing emissions that cause air pollution, smog, and climate change. We also recognize that our state’s high environmental standards often catalyze public and private investment in next-generation technologies and innovative solutions: As California goes, often so goes the nation.

However, we are concerned that CARB has failed to consider fully the unintended consequences of the regulation’s otherwise well-intentioned goal: phasing out emissions of air pollutants from the railroad industry. Indeed, it seems possible if not likely that this regulation could inadvertently increase air pollution in California by causing more shippers to switch from railroads to less-efficient transportation modes with greater emissions like trucks. Shifting freight tonnage from railroads to trucks also endangers public safety on California’s roads, which are already among the most congested in the nation.

Specifically, this regulation would prohibit operation of locomotives in California that are 23 years beyond their original date of manufacture, unless they are zero-emission. At present, there are no such commercially available locomotives. This regulation would also require that all new locomotives purchased for operation both within rail yards and passenger rail service in the state be zero-emission starting in 2030. That requirement would expand to line-haul locomotives in 2035.

While the goal behind this regulation is laudable, the requirements and timetables outlined therein seem unrealistic and likely to increase greenhouse gas emissions and other air pollutants in the near term. Rail is the most fuel-efficient means of transporting freight over land, with far less greenhouse gas emissions than trucking. If this new regulation shifts freight tonnage away from rail and onto roads as expected, CARB risks inadvertently worsening emissions while also exacerbating congestion and heavy vehicle damage to roads and bridges, which unlike railroads are maintained largely at public expense.

In particular, short line railroads operating in California have told us that some would be forced to go out of business as they would be unable to make the cost-prohibitive investments in locomotive technology that either does not yet exist or will not be commercially available or affordable when the regulation takes effect in 2030. This self-inflicted collapse of the short line railroad market in California would leave shippers with no option other than costlier, more pollution-intensive modes to transport freight.

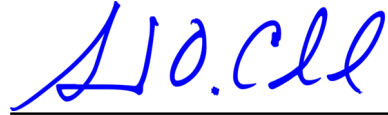
Again, we hope that CARB will consider improving this new regulation to actually achieve the goal we all share: transitioning the railroad industry to zero-emission locomotives fueled by clean energy as soon as possible. Thank you for your leadership and consideration.

Sincerely,



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John Garamendi  
Member of Congress



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Salud Carbajal  
Member of Congress



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J. Luis Correa  
Member of Congress



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Jim Costa  
Member of Congress