



June 16, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Comment Letter on Proposed Repeal of the In-Use Locomotive Regulation
(CCR §§ 2478–2478.17)

Dear Chair Randolph and Members of the Board:

On behalf of the Coalition for Clean Air, we understand that you have no real options other than to repeal the In-Use Locomotive Regulation. But it is important to recognize that repeal will set back efforts to reach California’s mandatory targets under the Clean Air Act and climate laws (SB 32/AB 1279). Repeal will also roll back critical emission reductions, exacerbate environmental injustice, and undermine public health benefits projected under the adopted rule.

Some of the same railroad companies that opposed the rule and sued to block it continue to bring dirty old locomotives to California, exacerbating the worst ozone and fine particle pollution in the U.S. Those companies could improve the situation voluntarily by upgrading their engines operating in California to Tier 4 or better, instead of deploying lawyers and lobbyists to block CARB’s efforts to reduce pollution.

I. Repeal Is a Step Backwards

1. Loss of Major Emission Reductions

- The Regulation would have achieved a 79% decrease in PM_{2.5} and a 77% decrease in NO_x between 2024 and 2050, relative to business-as-usual.
- Approximately 21.6 million metric tons of GHGs would have been avoided over the same period.

By repealing these provisions, these reductions will be forfeited, thereby making it much harder to meet mobile-source commitments of the State Implementation Plan.

2. **Disproportionate Impacts on Environmental Justice Communities**

- 71% percent of switchers and industrial locomotives operating in California are pre-Tier 0, each emitting as much as 1,319 heavy-duty trucks per year. These operate close to frontline communities, that are disproportionately exposed to the higher emissions and the resulting health costs.
- For instance, communities within 20 miles of the San Pedro ports would have seen up to a 95% reduction in PM_{2.5} and 93% in NO_x by moving to Tier 4/5 locomotives by 2040—savings that now vanish.

Repeal denies frontline residents the most substantial health and equity benefits envisioned in CARB's EJ Action Plan.

3. **Public Health and Economic Benefits Forfeited**

- Estimated net health savings of \$18 billion (benefits of \$32 billion vs. implementation costs of \$13.8 billion) disappear with repeal.
- CARB's own modeling indicates repeal will cause an additional 3,200 premature deaths, 1,100 hospital admissions, and 1,500 emergency-room visits through 2050, while cancer risk reductions in railyard communities drop from 90% back to baseline.

II. Recommendations for CARB's Locomotive Strategy

The Board can consider the following complementary measures to ensure emission reductions remain on track:

1. **Leverage and Expand Incentive Programs**

- When funding is available, grant incentive allocations specifically for repowering/replacing locomotives with the cleanest engines available. Tie grants to retirement of older units or upgrade of units, with clawbacks for noncompliance.

2. **Integrate Locomotive Actions into SIP & Scoping Plan Updates**

- Formally incorporate locomotive emission targets into the next SIP revision, ensuring they contribute to ozone attainment deadlines.
- In the 2027 Scoping Plan update, highlight rail electrification pilots, zero-emission switcher projects, and comprehensive inventory improvements.

- Preserve annual recordkeeping and reporting requirements (activity, emissions, idling) to build a robust, enforceable dataset.

3. Prioritize Class III & Industrial Locomotives

- In conjunction with air quality management districts, deploy ambient monitoring around major rail corridors to verify exposure levels and guide future regulations.
- Develop an interim regulation that phases down pre-Tier 0 switchers/industrial units by a near-term deadline.
- Maintain the 30-minute automatic shut off idling cap for all locomotives equipped with shutoff devices.

III. Conclusion

Repealing the In-Use Locomotive Regulation will undermine California's environmental, health, and equity goals. While it is not currently possible to maintain this lifesaving rule, we respectfully urge the Board to renew your commitment to ensuring that California continues to lead the nation in cleaning up rail emissions and protecting its most vulnerable communities.

Thank you for consideration of these comments.

Respectfully,



Bill Magavern
Policy Director

Polash Mukerjee
Volunteer Policy Consultant