



March 16, 2023

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Support for the Proposed In-Use Locomotive Regulation**

Dear Chair Randolph and Members of the Board:

On behalf of the American Lung Association, I am writing to express our support for the California Air Resources Board (CARB)'s proposed In-Use Locomotive rule and to urge the Board to adopt the rule. The proposed rule is vital to CARB's continued work to clean the air and to address disparities in pollution burdens caused by locomotive operations in California.

California is home to the most pollution-impacted communities in the United States and climate change is making the job of cleaning our air more difficult. Transportation sources are the major source of pollutants threatening health in California communities, including ozone- and particle-forming oxides of nitrogen (NO<sub>x</sub>), cancer-causing diesel particulate matter (DPM) and greenhouse gas emissions that cause climate change. The American Lung Association supports the proposed rule to ensure all locomotive types – passenger, switchers, industrial, and line haul – move to cleaner operations in support of attaining clean air standards and reducing harms in vulnerable communities.

The updated proposal would reduce and eliminate locomotive pollution through cleaner and zero-emission operations standards implemented over time. Key elements of the proposal also include an emissions-based spending account to fund the transition to cleaner locomotives, an engine idling limit, and prohibition on the use of legacy locomotives within California fleets. While we appreciate that the proposal has been updated to provide additional compliance options following stakeholder input, we encourage the Board to carefully review any reductions in emission benefits that could occur as a result, and must carefully monitor for foregone or delayed benefits as a key element of implementation.

Further, we urge the Board and staff to continue to review opportunities to strengthen the rule throughout the implementation phase. Potential avenues for a more-health protective rule could include updated technology reviews to strengthen in-use compliance requirements in various locomotive sectors; review of data to support shorter idling requirements, and other provisions to accelerate and expand the critical health protections offered by the rule.

The transition to cleaner locomotive operations was identified as the leading pollution-reduction strategy in the State Implementation Plan (SIP) and must be approved and implemented without delay. The health benefits of this rule are substantial, and vital for communities impacted by nearby rail operations:

- CARB staff estimates that a fleetwide transition to Tier 4 locomotives would reduce cancer risk on average by 91 to 93 percent by 2045 for people living within a mile of railyards.
- Total estimates of non-cancer health benefits are significant and include an estimated \$32.3 billion in monetized public health benefits from 2024 to 2050, over 3,200 lives saved, and nearly 1,500 emergency room visits avoided.

Implementing the proposed standards will greatly reduce catastrophic health emergencies and disparities in communities across California.

The American Lung Association urges CARB to approve this rule without delay to support attainment of clean air standards and to reduce unjust toxic air pollution exposures caused by locomotive operations. Please contact me with any questions at [Mariela.Ruacho@Lung.org](mailto:Mariela.Ruacho@Lung.org).

Sincerely,

Mariela Ruacho  
Manager, Clean Air Advocacy  
**American Lung Association**