

April 10, 2024

The Honorable Michael S. Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW; 1101-A  
Washington, DC 20460

**Re: CARB's Clean Air Act Authorization Request (EPA-HQ-OAR-2023-0574)**

Dear Administrator Regan:

We urge you to deny the California Air Resources Board's (CARB) application to exempt its In-Use Locomotive Regulation (Regulation) from the Clean Air Act.

The overreach of the CARB Regulation is stunning. It would mandate zero-emissions locomotives in some cases by 2030 and across-the-board by 2035, even though the technologies necessary to achieve these reductions do not exist.

Despite moving 40% of the nation's long-distance freight by ton-mile, the sector accounts for only 0.6% of U.S. GHG emissions. Moreover, railroads are an essential freight transportation option for American businesses — including those in manufacturing, agriculture, retail, and energy production — in which scale of operations is critical to competing in the global market.

Allowing the Regulation to move forward would cause enormous and destructive impacts to America's supply chains and economy, and likely increase greenhouse gas emissions.

- **California Regulation Would Be National Regulation.** A very large portion of the locomotive fleet moves through the state of California each year, so railroads operating as far away as Montana, Pennsylvania, North Carolina, and even Maine and Florida would be forced to comply with California's standard.
- **The CARB Regulation Threatens the U.S. Supply Chain.** Railroads are developing new technologies to reduce emissions, but there are no viable, zero-emission locomotives that could be deployed at scale to meet the demands of the CARB Regulation. Without proven technology in place, the logistical challenges of complying with this Regulation would be enormous and

complicate critical supply chains for energy products, food, intermodal deliveries, and service to America's ports.

- **Freight Would Be Forced from Rail to Roads.** It is hard to envision a scenario whereby trains would stop at the California border to change locomotives without significant impact on national supply chains, making diversion of freight off the rail network the most likely outcome.
- **The CARB Regulation Would Drive Short Line Railroads Out of Business.** In California alone, short lines handle more than 260,000 carloads per year. Nationally, short line railroads handle 20 percent of rail cars at origin and destination, serving virtually every industry. Short lines do not have the capacity to replace their entire locomotive fleets to comply with the deadlines.
- **The CARB Regulation Would Harm the Largest Railroads and their Customers.** Estimates suggest that Class I railroads would be required to deposit as much as \$800 million per year, per railroad, for compliance with spending account provisions of the proposal. This capital drain could force major infrastructure improvements to be shelved, including those designed to reduce operations emissions and improve safety. Moreover, Union Pacific recently estimated that a fleet renewal as stipulated by the CARB Regulation would lead to more than \$14 billion in cost increases passed on to consumers.

Ultimately, the CARB Regulation would undermine efficiency and dramatically slow commerce, thereby undermining the integrity of the integrated supply chain and the reliability of railroads to meet demand. Ironically, it would also harm ongoing efforts to reduce greenhouse gas emissions in the freight rail industry. We urge you to reject CARB's application.

Sincerely,

U.S. Chamber of Commerce  
Agricultural Retailers Association  
Aiken Chamber of Commerce  
Alaska Chamber  
Albany Area Chamber of Commerce (OR)  
Arkansas State Chamber of Commerce / Associated Industries of Arkansas  
Ascension Chamber of Commerce  
Associated Industries of Florida  
Berkeley Chamber of Commerce  
Billings Chamber of Commerce

Brea Chamber of Commerce  
Buckeye Valley Chamber of Commerce  
Buellton Chamber of Commerce  
Burlington Chamber of Commerce  
Cadillac Area Chamber of Commerce  
California Business Roundtable  
California Farm Bureau  
Campbell County Chamber of Commerce  
Canby Area Chamber of Commerce  
Carlsbad Chamber of Commerce  
Central Fairfax Chamber of Commerce  
Chamber Southwest Louisiana  
Chandler Chamber of Commerce  
Chicagoland Chamber of Commerce  
Chino Valley Chamber of Commerce  
Columbia Montour Chamber of Commerce  
Colusa County Chamber of Commerce  
Corsicana & Navarro County Chamber of Commerce  
Davis Chamber of Commerce  
Decatur Chamber of Commerce  
Detroit Regional Chamber  
Duchesne County Chamber of Commerce  
Eden Prairie Chamber  
Edwardsville/Glen Carbon Chamber of Commerce  
Fort Worth Chamber of Commerce  
Fountain Hills Chamber of Commerce  
Gateway Chambers Alliance  
Georgia Chamber of Commerce  
Glendora Chamber of Commerce  
Green Oaks, Libertyville, Mundelein, Vernon Hills Chamber of Commerce  
Grant County Chamber of Commerce  
Greater Binghamton Chamber of Commerce  
Greater Cheyenne Chamber of Commerce  
Greater Coachella Valley Chamber of Commerce  
Greater Flagstaff Chamber of Commerce  
Greater Grass Valley Chamber of Commerce  
Greater High Desert Chamber  
Greater Lafayette Commerce  
Greater Lawrence Chamber of Commerce  
Greater Mankato Growth

Greater North Dakota Chamber  
Greater Omaha Chamber  
Greater Phoenix Chamber  
Greater Rochester Chamber of Commerce  
Greater Shreveport Chamber  
Greater Spokane Valley Chamber of Commerce  
Greater Topeka Chamber  
Habersham County Chamber of Commerce  
Harbor Association of Industry and Commerce  
Huber Heights Chamber of Commerce  
Illinois Chamber of Commerce  
Indiana Chamber of Commerce  
Inland Empire Economic Partnership  
Iowa Association of Business and Industry  
Joliet Region Chamber of Commerce & Industry  
Kalispell Chamber of Commerce  
Kentucky Chamber of Commerce  
Kingman Area Chamber Of Commerce  
Louisiana Association of Business and Industry (LABI)  
Laguna Hills Chamber of Commerce  
Laguna Niguel Chamber of Commerce  
Lewistown Area Chamber of Commerce  
Long Beach Area Chamber of Commerce  
Longview TX Chamber of Commerce  
Los Angeles Area Chamber of Commerce  
Los Angeles County Business Federation (BizFed)  
Loudoun County Chamber of Commerce  
Maryland Chamber of Commerce  
Minneapolis Regional Chamber  
Minnesota Chamber of Commerce  
Missouri Chamber of Commerce and Industry  
Modesto Chamber of Commerce  
Montana Chamber of Commerce  
Moses Lake Chamber of Commerce  
Murrieta/Wildomar Chamber of Commerce  
Nebraska Chamber of Commerce & Industry  
Nevada Farm Bureau Federation  
New Jersey State Chamber of Commerce  
Newark Regional Business Partnership  
Newport Beach Chamber of Commerce

North Carolina Chamber of Commerce  
North Country Chamber of Commerce  
North San Diego Business Chamber  
Norwalk Chamber of Commerce  
Orange County Business Council  
Oregon Business & Industry  
Palm Desert Area Chamber of Commerce  
Palos Verdes Peninsula Chamber of Commerce  
Payson Santaquin Area Chamber of Commerce  
Pennsylvania Chamber of Business and Industry  
Pocatello-Chubbuck Chamber of Commerce, Inc.  
Port Hueneme Chamber of Commerce  
Prattville Area Chamber of Commerce  
Queen Creek Chamber of Commerce  
Queens Chamber of Commerce  
Rancho Mirage Chamber of Commerce  
Rio Rancho Chamber of Commerce  
Roseburg Area Chamber of Commerce  
San Angelo Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Marcos Chamber of Commerce  
Santa Barbara South Coast Chamber of Commerce  
Santa Paula Chamber of Commerce  
Santee Chamber of Commerce  
Schuylkill Chamber of Commerce  
Simi Valley Chamber of Commerce  
South Bend Regional Chamber  
South Dakota Chamber of Commerce & Industry  
South Valley Chamber of Commerce  
St. Paul Area Chamber  
Streetsboro Area Chamber of Commerce  
The Chamber of Grand Forks / East Grand Forks  
The Greater Houston Partnership  
The Greater Springfield Chamber of Commerce  
The Mansfield Area Chamber of Commerce  
Tulare Chamber of Commerce  
Union County KY Chamber of Commerce  
Utah Valley Chamber of Commerce  
Vegas Chamber  
Washington County (MD) Chamber of Commerce

West Ventura County Business Alliance  
White Pine Chamber of Commerce  
Will County Center for Economic Development  
Willits Chamber of Commerce  
Yorba Linda Chamber of Commerce