



Ventura County Transportation Commission

Nov. 3, 2022

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Proposed In-Use Locomotive Regulation

Chair Randolph: ☺☺☺

On behalf of the Ventura County Transportation Commission (VCTC), I write to you to express our concerns regarding the California Air Resources Board's (CARB) proposed In-Use Locomotive Regulation.

VCTC is a member of the Joint Powers Authority (JPA) of the Southern California Regional Rail Authority (SCRRA), which operates the Metrolink service. Like transit agencies across the state and nation, VCTC continues to recover from the severe decline in ridership caused by the COVID-19 pandemic.

The proposed requirement of a spending account for zero-emissions equipment will require passenger rail agencies and transit agencies like VCTC to divert critical operating funds that are needed to maintain and expand service. The pandemic combined with the ability of more employees to work remotely or on hybrid schedules mean ridership and fare revenues have been greatly reduced. Many agencies have yet to restore service to prepandemic levels and already are experiencing higher costs to operate the service that remains. Requiring agencies to set aside operating funds undoubtedly will result in more service cuts and will eliminate the possibility of a return to prepandemic service levels, leaving riders with fewer public transit options such as passenger rail.

Likewise, imposing a useful life requirement of 23 years for locomotives could force passenger rail agencies to repay federal funds if locomotives are retired earlier than the 30-year federal life standard, again potentially inflicting financial harm on the rail agencies. It is unlikely that operators will be able to absorb these costs without negative impacts to ridership, service and budgets.

We share California's goal to accelerate and deploy zero-emission technology as soon as feasible and help reduce harmful emissions. Currently no zero-emissions locomotive technologies exist that have been deemed safe for public passenger rail service. Zero-emissions locomotives will require time and public incentives to achieve the same market availability as on-road hybrid and zero-emissions technologies.

Any regulation should include consistent off-ramps available to other public transit operators under the Innovative Clean Transit Rule (ICT). Likewise, current regulation language imposes a 2030 date for passenger rail agencies and affords a five-year delay for freight rail operators. Regulation should provide a consistent 2035 zero-emissions purchase date between freight and passenger rail agencies.

We appreciate the opportunity to comment on the proposed In-Use Locomotive Regulation. If you need any additional information, please contact Darrin Peschka, VCTC program manager of government and community relations, at dpeschka@goventura.org or 805-642-1591, ext. 108.

Sincerely,

A handwritten signature in blue ink, appearing to read "Martin Erickson".

Martin Erickson

Executive director

[Faint, illegible text, possibly a stamp or watermark]