



Clerks' Office  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, California 95814

*August 18, 2023*

RE: In-Use Locomotive Regulation – Second Notice of Public Availability of Modified Text

To Whom It May Concern:

On behalf of the Southern California Regional Rail Authority (Metrolink), I write to you to offer comments regarding the modified text for the In-Use Locomotive regulation.

Metrolink and California's passenger rail agencies are leading the deployment of emissions-reducing technologies like deploying the cleanest available Tier 4 locomotives and converting to 100 percent fossil-free renewable fuel. We recognize that further progress toward zero emissions will require robust incentive funding, a multi-agency response, and a policy framework that accounts for the conditions and needs of passenger rail agencies.

The modified text of the regulation released on August 8 provides additional clarification for operators across the state. Of note, we appreciate the below points in the revised text.

1. Conformity between CARB and local air district reporting requirements.
2. Providing flexibility for operators to determine usage in either megawatt-hours or using the provided fuel consumption formula.
3. Providing operators an additional two years to secure incentive funding and purchase equipment in the context of the Spending Account, an Alternative Compliance Plan, or Alternative Fleet Milestone Option.
4. Including a review of safety improvements needed for the operations of zero-emissions equipment as part of the 2027 and 2032 assessments.

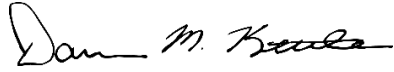
The availability of incentive funding at all levels of government will be a central part of the regulation's long-term success. Passenger rail agencies will require direct, dedicated, and long-term predictable funding to ultimately achieve the goals of the In-Use Locomotive regulation. Even with the availability of new state and federal transportation funding – operators like Metrolink continue to rely on oversubscribed discretionary grant programs with funding levels insufficient to award otherwise meritorious applications. More action is needed to achieve our technology and equipment goals.

Thank you for your time and consideration of Metrolink's comments. We value the close partnership between our agencies and appreciate the additional clarifications provided in the modified text. There is more work to do and resources are needed to see the full potential of the deployment of reduced-emissions and zero-emissions locomotive



equipment across the state. Metrolink looks forward to working with CARB and industry partners toward that shared goal.

Sincerely,



Darren M. Kettle  
Chief Executive Officer

