



ASSOCIATION OF AMERICAN RAILROADS
425 Third St., SW, Suite 1000
Washington, D.C. 20024

Michael J. Rush
Senior Vice President
Safety and Operations

Phone: (202) 639-2503
E-Mail: mrush@aar.org

July 18, 2016

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814
(916) 322-8277

SUBMITTED VIA

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=sjvsip2016&comm_period=N

RE: Proposed 2016 State Strategy for the State Implementation Plan

The Association of American Railroads (AAR) and its member companies appreciate the opportunity to comment on the California Air Resources Board's (CARB) Proposed 2016 State Strategy for the State Implementation Plan ("Proposed SIP").¹ AAR has several members that operate in California; however, all AAR members have an interest in discussions that involve technological advances to locomotives.

AAR and its members remain committed to working with regulators to reach meaningful and carefully considered resolutions to environmental concerns in California and nationally. As you are aware, over the last two decades, AAR and its members made significant investments in California and voluntarily agreed to enforceable measures that were effective in significantly reducing diesel particulate matter and NOx emissions from locomotives and other rail

¹ The Association of American Railroads ("AAR") is a national, non-profit trade association that represents the Nation's major freight railroads. AAR's membership includes freight railroads that operate 83 percent of the line-haul mileage, employ 95 percent of the workers, and account for 97 percent of the freight revenues of all railroads in the United States. AAR's membership also includes passenger railroads that operate intercity passenger trains and provide commuter rail service. AAR is the Nation's leading railroad policy, research, standard setting, and technology organization. AAR and its members are committed to operating the safest, most efficient, cost-effective, and environmentally sound rail transportation system in the world.

operations in the state. With that context in mind, AAR provides the input below on the Proposed SIP.

First, AAR agrees with CARB that any discussion about changes to the emission limits for the next generation of new and retrofit locomotive emissions standards should be, if at all, convened by the U.S. Environmental Protection Agency (EPA). Changing locomotive technology in one state does not simply impact one state. Railroads operate across state lines. Any changes to the technology will require a uniform approach by regulators. As such, all stakeholders should be given the opportunity to be involved and provide input.

Second, any consideration of future standards must be predicated on a detailed analysis of cost effectiveness as well as energy efficiency. In addition, CARB's discussion of the challenges that EPA and other stakeholders may need to consider in developing new locomotive standards is helpful, but the discussion should also be framed by the safety implications of any proposed solutions as well as the environmental benefits.

In conclusion, emission standards should encourage the most environmentally beneficial form of transportation, rather than unreasonably burdening it. Creating costly, technologically infeasible, or unsafe mandates will not benefit the environment, protect the public, and could potentially harm the U.S. economy. Every effort should be made in future discussions to clearly acknowledge significant technological obstacles and to devise practical, cost effective, and safe environmental solutions.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Rush". The signature is written in a cursive style with a horizontal line above the name.

Michael J. Rush