



SOUTHERN CALIFORNIA RAILWAY MUSEUM
P.O. BOX 548 • PERRIS, CA 92572
WWW.SOCALRAILWAY.ORG

DIRECT EMAIL: gastarre@gmail.com
DIRECT DIAL: (818) 489-2700

April 8, 2021

California Air Resources Board
Freight Transport Branch
freight@arb.ca.gov

phone 816 322 8382

Re: Proposed Regulation of Diesel Locomotives

Dear Ladies and Gentlemen:

We have become aware that California Air Resources Board is proposing to adopt to Title 13, California Code of Regulations, Chapter 9, Article 8, Section 2478 (2478.1 – 2478.19) provisions for the control of diesel locomotive operation in California. As we read the proposed regulation, all locomotives would have to be less than 23 years old. If older than 23 years, the only exemptions are for locomotives under 1006 horsepower, used in the instruction of diesel mechanics, operated less than 10 hours per calendar year, or military locomotives.

What is not addressed is the use of vintage historic diesel locomotives used by non-profit educational public benefit organizations (i.e. museums), maintained, displayed, and operated by museums, such as the Southern California Railway Museum.

Southern California Railway Museum is one of a handful of museums in California operating historic locomotives as part of its educational function. In the case of SCRM, we operate the locomotives as part of providing a hands-on riding experience on vintage coaches. The educational aspect of our operation is very strong as visitors are provided a ride on vintage equipment and also given an oral lesson in the history of the equipment, including the locomotive. It is our intention to keep and maintain these locomotives long beyond 2035 so that future generations can learn the lessons of transportation history.

Our customary operation of the locomotives is to use one of our historic locomotives on Saturdays and Sundays when we provide our interpretive rides. Among our policies, unless we plan to depart within five minutes of arrival upon return from a trip, we shut down the locomotive. From time to time we may have need for a second locomotive to move cars around our museum complex as part of moving cars into and out

of maintenance facilities. It is highly unusual for us to operate a series of locomotives more than 25 hours in a week, and most of them operate significantly less than that.

An exemption needs to be created for museum and historic locomotives. They are few in number in California and do not contribute a significant impact on the air quality of California. For the most part, these historic locomotives are operated as part of an educational program. They are not involved in the transportation of commerce, be it freight or passenger. They are not hauling heavy loads and are maintained to the best standards possible for older technologies.

Except for the California State Railroad Museum, other preservation efforts, such as SCRMM, are nonprofit entities that have taken a terrible beating during the recent pandemic. Though safety and being a good community citizen are paramount in the operation of a museum railway, additional regulations and reporting make it difficult to financially justify the continued preservation of historic locomotives, including steam locomotives and first generation diesel locomotives.

If this regulation were enacted as presently proposed, movie and television productions which use period locomotives, both steam and diesel, would be effectively barred from being filmed in California. Additionally, rare appearances of large steam and diesel vintage locomotives, which always attract large crowds of all ages, would also be also be banned, harming tourism.

To learn more about our operations, please do not hesitate to contact me. We look forward to working with you to carve out a workable exemption for historic locomotives.

Very truly yours,

Robert H. Winn

Robert H. Winn
Vice President/Chief Executive Officer/General Manager
Southern California Railway Museum

Gary A. Starre

Gary A. Starre
Member, Board of Directors, Asst. Division Manager Operations
Southern California Railway Museum

GS/g

Cc: heritagerailalliance@wildapricot.org
tom@tomjacobsonlaw.com
rodfishburn@earthlink.net
jasonshoemaker@att.net