

November 7, 2022

California Air Resources Board

P.O. Box 2815

Sacramento, California 95812

**Re: Comments on In-Use Locomotive Regulations**

Dear Chair Randolph and Members of the Board:

The San Joaquin Valley Railroad provides rail freight services in the area served by the Kern Economic Development Corporation (Kern EDC). This railroad is a very important and fundamental part of our efforts to attract new companies and jobs to our region and is an important partner in our efforts.

Kern EDC represents a coalition of business, education, and government leaders dedicated to ensuring a diverse and strong economic climate for Kern County. Kern EDC focuses it collaborative efforts on the recruitment of new business opportunities and assisting in the retention and expansion of existing businesses.

Many new manufacturing or logistics operations require direct rail access and a high level of customized rail freight service. This is exactly what smaller short line freight railroads like San Joaquin Valley Railroad do best. These smaller railroads link areas not served by BNSF or Union Pacific in California to the national railroad network. They are an excellent catalyst for local growth and employment.

It has been brought to our attention that California Air Resources Board is considering new locomotive regulations that would place a massive financial demand on these small, short line operations. Considering the importance of small railroads, and the very low percentage of air pollution and GHG emissions they create in the state, risking their financial ability to survive is not good public policy. If these railroads cannot operate and maintain their tracks, freight shipments like those handled our region will have no choice but to ship via trucks, which would only increase highway congestion levels.

Based on these points, we strongly encourage you exempt these smaller freight railroads from the new in-use locomotives under consideration for adoption.

Thank you for your time and consideration of this critical matter.

Sincerely,



Richard D. Chapman

President & CEO