

From: [Gonzalez, Layla@ARB](mailto:Gonzalez_Layla@ARB)
To: [ARB Clerk of the Board](#)
Subject: FW: Input Re. Proposed Regulation Order In-Use Locomotive Regulation
Date: Thursday, March 16, 2023 2:37:56 PM

Hello! This was submitted to me today. This gentleman called me as well to let me know the docket kept timing out when he tried to submit comments. Please make sure this gets in the In-Use Locomotives Regulation 15-day comment docket. Thank you!

Layla

From: Marty Westland <martywestland@att.net>
Sent: Thursday, March 16, 2023 1:34 PM
To: Gonzalez, Layla@ARB <Layla.Gonzalez@arb.ca.gov>
Subject: Input Re. Proposed Regulation Order In-Use Locomotive Regulation

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3/16/2023

To: C.A.R.B.

From: Marty Westland, Director, Carson and Colorado Railway, POB 194, Independence, CA 93526
e-mail: martywestland@att.net Ph. 406-587-2775 (let ring 8x to leave msg.)

Suggestions for "In-Use Locomotive Regulation":

Re. Sec. 2478.2 Exemptions Locomotives meeting the following classifications are exempt from this Locomotive Regulation including all registration, recordkeeping and reporting requirements: (a) Locomotives propelled by engines with a total continuous rated power of less than 1,006 horsepower(hp). For locomotives... (continue as written).

Explanation: It needs to be clearly stated that no registration, reporting or recordkeeping is required for exempt locomotives. The addition of the term "continuous" to describe the power of the locomotive will tend to prevent confusion when assessing steam locomotives. Steam locomotives were typically rated by tractive effort, not horsepower.

Re. 2478.11 (g) Historic Railroad Report. No later than July 1 of each Calendar Year, An Historic Railroad Operator...shall submit...

Explanation: I suspect the authors mistakenly lined-through the "July 1" language, which is necessary to define when the report must be submitted.

Re. Sec. 2478.13 (a)(2) I would suggest: "...Fleet does not use more than 20,000 gallons of fuel..."

Explanation: 10,000 gallons of fuel is significant for a diesel engine powered locomotive, but larger steam locomotives will consume this amount of fuel in a few days, perhaps only hours, of operation. However, it

must be recognized that these historic examples (in operating condition) are very few, are used very infrequently, and their NOx contribution is nil. Can an exemption be carved out specifically for steam locomotives? I am appealing to the sensibility of the Board to create a niche for a very small part of the historic collection in California. Fuel cost alone will limit the usage of steam locomotives, especially the larger survivors.

Thank you for your consideration.

Sincerely,

Marty Westland, Director

Carson and Colorado Railway, Independence, California