

MOJAVE INLAND PORT
A Pioneer Partners 2000 LLC Project

March 10, 2023

Clerks' Office, California Air Resources Board
1001 I Street, Sacramento, California 95814
<https://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed In-Use Locomotive Regulation; Public Comment Request- SUPPORT

On behalf of the Pioneer Partners 2000 LLC Project, the Mojave Inland Port, please accept this letter of support of the Proposed In-Use Locomotive Regulation currently under consideration by the California Air Resources Board. Specifically, we'd like to call attention to 2478.3. Definitions: ff "Zero Emission (ZE) Capable Locomotive" & gg "Zero Emission (ZE) Configuration" along with Zero Emission Credits in general. We support these clarifications in hopes that it will give a greater understanding to the industry and possibly incentivize a reassessment of operations to further California's Air Quality goals.

As proposed at the Mojave Inland Port, construction plans include the installation of multiple charging stations for locomotives, trucks, and cars to provide service to the trains, trucks, and service vehicles using the Port. Having dedicated charging stations for locomotives and tractor-trailer rigs at the Mojave Inland Port will further California's renewable energy mandates and will facilitate a more rapid conversion to electric-only trucks and locomotives, both of prime benefit to the Southern California airshed.

Additionally of note in furthering these goals, we have conducted an analysis of the air quality impacts of moving containers from the Ports of Los Angeles and Long Beach to the Mojave Inland Port using two modes of transfer— trains and tractor trailers (trucks). Please see the complete report at: www.mojaveinlandport.com. Much of our analysis relies on work already conducted by CARB itself. Even a conservative assessment of the data concludes that Locomotive/Rail is a clear winner for clean goods movement.

We applaud CARB's efforts to offer a clear guidance for In-Use Locomotive operations in California. For these reasons, the Mojave Inland Port Project is in strong support of this proposed regulation. Should you have any questions about this matter, please contact: Sean Henschel at 916-952-2419 and Sean@resolutecompany.com.

Sincerely,

Richard C. Kellogg, Jr.

Chair, Pioneer Partners 2000, LLC

Cc: Steven S. Cliff, Ph.D. Executive Officer, CARB
Eric Fredericks, Freight Policy Manager, CalSTA
Union Pacific
BNSF