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August 23, 2023

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95811

RE: CARB In-Use Locomotive Regulation Second 15-Day Notice Comments

Dear Chair Randolph:

On behalf of the Peninsula Corridor Joint Powers Board (Caltrain), I am pleased to offer our comments on the newly proposed modifications for the In-Use Locomotive Regulation. Caltrain shares the California Air Resources Board's (CARB) ambitious air quality and emissions reductions goals, and we are doing our part to achieve them. We are steadily making progress on our Electrification Project and look forward to transitioning the portion of our corridor between San Francisco and San Jose from diesel to electric operations in Fall 2024.

We appreciate CARB's continued willingness to meet with Caltrain staff and answer questions that arise as we develop our Alternative Fleet Milestone Option (AFMO) to comply with the regulation. This valuable feedback loop allows Caltrain to ensure we are accurately interpreting the regulation to meet the desired goals.

Regarding the Second Notice of Publicly Available Modified Text, we want to specifically thank CARB for the following changes:

Extended Timelines

We appreciate the new effective date of January 1, 2024, that allows rail operators additional time to comply with the In-Use Locomotive Regulation. These extra few months are valuable as we continue developing our AFMO plan and receive and incorporate feedback.

Caltrain agrees that shifting the first reporting and recordkeeping requirements from July 1, 2024, to July 1, 2026, for consistency with the Spending Account deadlines is a logical adjustment to the regulation. Although Caltrain plans to comply with the regulation via the AFMO rather than the Spending Account, the new reporting and recordkeeping are still applicable to Caltrain, and the extended deadlines will allow staff additional time to manually collect this information.

Calculating Usage & Megawatt Hours

Caltrain thanks CARB staff for providing more clarification in the proposed modified text that "usage" can be determined either by megawatt hours (MWh) or by fuel consumption. Caltrain has commented on this in prior letters, and we are pleased to see the clarification in this version of the

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August 22, 2023

Page 2

regulation.

We recently raised concerns with CARB staff about the requirement to have a properly functioning MWh meter on Board rather than the alternative of calculating usage based on fuel consumption for agencies opting to comply with the regulation through the AFMO. We are pleased to see the requirement for a MWh meter has been clarified and acknowledgement that the meters are not necessary as operators can calculate usage using based on fuel consumption.

Caltrain additionally alerted CARB staff that our ability to report the total MWh of operation since the locomotive's build date was not possible given that we have historically not been required to report this data, and therefore do not have this information available. We appreciate the deletion of that requirement in this modified version of proposed text.

We want to thank CARB for the opportunity to provide comments on the Second Notice of Publicly Available Modified Text, and we look forward to our continued partnership on the In-Use Locomotive Regulation in the future. For any questions regarding this letter, please contact Devon Ryan, Government and Community Affairs Officer, ryand@samtrans.com, (650) 730-6172.

Sincerely,



Michelle Bouchard
Executive Director

cc: Members, California Air Resources Board
Dr. Seven Cliff, Executive Director, California Air Resources Board
Heather Arias, Chief, Transportation and Toxics Division, California Air Resources Board
Jamie Callahan, Chief of Staff, Office of Chairwoman Liane Randolph, California Air Resources Board
Peninsula Corridor Joint Powers Board of Directors