



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

November 7, 2022

California Air Resources Board (CARB)
Board of Directors
1001 I Street
Sacramento, CA 95814
[Submitted via Comments to the Board]

Re: Proposed In-Use Locomotive Regulation – Comment Letter

Dear CARB Board of Directors:

On behalf of the Los Angeles County Metropolitan Transportation Authority (LA Metro), I write to you regarding the California Air Resources Board (CARB) proposed In-Use Locomotive Regulation.

As the transportation planner, coordinator, designer, builder, and operator for the country's largest, most populous county, LA Metro takes seriously our vital role in the fight against climate change and in meeting global, state, and local transportation sector targets.

Metro's own goal is to become a zero-emissions agency by 2050. We are committed to achieving a 79% reduction in operational GHG emissions from the 2017 baseline by 2030. We are in the midst of deploying complex strategies including transitioning Metro's fleet to zero emissions technology and decarbonizing our energy and fuel supply. Another major strategy to cut transportation emissions is reducing vehicles miles traveled by Los Angeles County drivers through providing low and zero emissions modes of transit. In this work, Metrolink is a key partner for us in encouraging mode shift.

LA Metro is also the largest funding partner in the Southern California Regional Rail Authority (SCRRA) Metrolink commuter rail system, so the financial impact of regulations on Metrolink impacts us as well.

In responding to the details of CARB's proposed In-Use Locomotive Regulation, we want to first express that LA Metro supports CARB's goals to reduce locomotive emissions through investments in the cleanest available Tier 4 locomotives.

Second, we echo Metrolink's comments in asking that public agencies not be held to a Spending Account or Useful-Life Requirement as a means of further emissions reductions, and that flexibility be provided in how agencies finance their implementation of climate goals. Just as transit agencies are still recovering from ridership declines due to the COVID pandemic, commuter rail agencies are also getting back on their feet and we want to make sure that Metrolink has the financial ability and flexibility to provide service to our shared customer base at this time.

Third, we encourage you to reevaluate the impacts on the financial health of agencies of an imposed useful life requirement for locomotives of 23 years given this will be significantly shorter than the federal 30-year life standard. This proposal could force agencies to repay Federal funds if locomotives are retired early.

Finally, we ask that CARB provide a sufficient level of funding required for the development of locomotive technologies as was provided to other public transit modes. There are mature commercial markets for hybrid and zero-emissions buses and personal vehicles in part because of decades of significant public investment at the Federal and State levels in alternative technologies in these sectors, in partnership with private industry. Rail will require the time and incentive pilot funding afforded to the development of other zero-emissions technologies.

LA Metro and SCRRA are committed to accelerate and deploy zero-emissions technologies as soon as is feasible. We appreciate your attention as the CARB Board of Directors seeks to reduce emissions from the rail sector. Please contact Michael Cano at 213.418.3010 or canom@metro.net if we may be of any assistance in your efforts.

Thank you,



James de la Loza
Chief Planning Officer
LA Metro