

NORTH COUNTY TRANSIT

SAN DIEGO RAILROAD

June 16, 2025

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

Re: Comment on Proposed Repeal of In-Use Locomotive Regulation

Dear Chair Randolph:

On behalf of North County Transit – San Diego Railroad (NCTD), I write to you regarding the California Air Resources Board (CARB) proposed repeal of the In-Use Locomotive Regulation (Regulation). I appreciate your attention and consideration of potential impacts of the proposed Regulation on NCTD and other passenger rail operators. I respectfully ask that CARB repeal the Regulation.

NCTD fundamentally shares CARB's goal to reduce locomotive emissions and remains completely committed to offering public transit services that limit the harmful effects of air pollution on the public. In fact, NCTD's transportation services are effective reducers of greenhouse gas emissions (GHG) and NCTD's commuter rail service, known as the COASTER, is the San Diego region's most efficient tool in reducing vehicle miles traveled (VMT). On average, COASTER customers travel approximately 26 miles per trip and based on pre-COVID data, the COASTER reduced VMT by approximately 19.4 million in Fiscal Year (FY) 2018.

NCTD has also taken aggressive steps toward achieving emissions reduction goals by improving operational efficiencies and transforming its fleet. COASTER service currently operates with nine Tier IV locomotives which are among the cleanest passenger locomotives in the nation and reduce emissions by nearly 90% compared to Tier-0 locomotives. Additionally, NCTD is actively pursuing options to procure zero emission trains to operate its SPRINTER hybrid rail service. This would represent a complete overhaul the existing diesel multiple-unit SPRINTER fleet and replacement with zero emission vehicles.

NCTD's proactive transition to Tier IV and zero emission rail operations demonstrates its commitment to reducing locomotive emissions. It is within that context that I raise NCTD's concerns with the Regulation. First, requiring passenger rail operators, to pay into a Spending Account would divert critical operating and maintenance funds needed for rail, bus, and Americans with Disabilities Act (ADA) paratransit services. This punitive requirement is counterproductive to achieving clean air objectives because it would directly divert funding from public transit services that play a critical role in achieving the State's GHG reduction goals.

In general, the Regulation is based upon the presumption that passenger rail equipment needs can be met using zero emission technology within the proposed timeframe of the Regulation. However, this technology is not currently available at the scale necessary to comply with the Regulation. NCTD urges CARB to continue its coordination with passenger rail rolling stock manufacturers, passenger railroads, other subject matter experts, and federal partners to understand the feasibility of zero emission locomotives for passenger railroads.

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810 Mission Avenue
Oceanside, CA 92054



(760) 966-6500
(760) 967-2001 (fax)



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As written, the Regulation will delay the adoption of cleaner rail technology by the public sector by limiting public agencies' ability to efficiently move towards a zero emissions goal. CARB and the Legislature should instead establish a grant program to fund the pilot implementation of zero emission locomotives and multiple-unit trains, as well as associated infrastructure. The establishment of pilots would allow NCTD and other passenger rail operators to determine which zero emission technology can serve as an adequate replacement to ensure no disruptions of service to customers. NCTD encourages CARB to consider how its regulatory framework can help advance such pilot programs that will accelerate the adoption of zero emission technologies. CARB should work to address the impediments that will prevent zero emission locomotives from being a commercially viable technology for the foreseeable future, with or without regulation.

Finally, the proposed Regulation does not reflect the collaborative relationship that should exist between CARB and passenger rail agencies to achieve the shared goal of fighting climate change and protecting public health. NCTD operates one of the few passenger rail operations with the characteristics necessary for the potential capability of today's battery-electric and hydrogen technology options. These characteristics include the length and topography of NCTD's rail line, as well as the co-habitant intercity, freight and other commuter rail operators with which NCTD's shares its railroad. These factors make NCTD a test environment for the feasibility of zero emission technology adoption statewide and beyond. NCTD embraces the important role it can play to help move the development of zero emission rail technology forward. This proactive strategy, however, will only succeed if a collaborative approach with CARB exists.

Thank you for your consideration. I look forward to CARB's discussion on potentially repealing the Regulation. If you have any questions, please contact Mary Dover, NCTD's Chief of Staff at 760-967-2895 or via e-mail at mdover@nctd.org.

Sincerely,



Shawn M. Donaghy
Chief Executive Officer

cc: Members, California Air Resources Board

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(760) 967-2001 (fax)



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