



November 4, 2022

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Health Groups in Strong Support of Proposed In-Use Locomotive Regulation

Dear Chair Randolph and Board Members:

On behalf of the undersigned health organizations, we write to urge the California Air Resources Board (CARB) to approve a comprehensive in-use locomotive rule. This is a life-saving regulation, especially for communities living adjacent to railyards who are disproportionately exposed to locomotive pollution, including cancer-causing diesel particulate matter (DPM)s.

The American Lung Association's [State of the Air 2022](#) report found that California is home to eight of the ten most particle-polluted cities in the United States, and six of the American cities most impacted by ozone.¹ This rule provides a major step forward for cleaner air broadly and is especially critical to address existing fleets and as expansions of rail traffic are considered. This rule is needed to meet federal clean air standards and to accelerate clean technologies and health protections in our most vulnerable communities.

¹ American Lung Association. State of the Air 2022. Most Polluted Cities List. April 2022.
<https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

Meet Clean Air Act and State Implementation Plan Commitments

In September, CARB approved the State Implementation Plan (SIP) to attain health-protective National Ambient Air Quality Standards for Ozone, with the locomotive standard representing the single largest source of ozone-forming nitrogen oxide (NO_x) emission reductions in the plan. CARB must follow through on the SIP commitment and adopt the In-Use Locomotive Rule to fulfill its Clean Air Act obligations.

We applaud CARB's commitment to reducing pollution and transitioning to zero-emission technologies to protect health and reduce disparities. In addition to the needed NO_x reductions illustrated in the 2022 Ozone SIP, we also note that disadvantaged communities have consistently identified the need to reduce emissions from railyards in AB 617 Community Emission Reduction Plans² due to the significant local health impacts of DPM.³ In fact, the staff report states, "the transition to tier 4 locomotives and resulting emission reductions will result in a 91 to 93 percent reduction in average cancer risk in 2045" in communities within one mile of representative railyards. Cancer risk reduction is one of many estimated health benefits of the proposed rule.

Ensure All Locomotives Transition to Cleaner Technologies

This is a critical rule based on the extremely slow pace of upgrades to locomotive fleets leading to prolonged negative health consequences for too many vulnerable Californians. The final rule must apply to all locomotive types (Switchers, Passenger Locomotives, Industrial Locomotives and Line Haul "Class 1" Locomotives) to protect health and ensure all segments of this highly polluting industry transition to cleaner technologies. The proposal provides a comprehensive approach to reducing and eliminating locomotive-related health risks for Californians:

1. Requires locomotive operators to deposit funds into trust accounts for purchase of cleaner technologies (Tier 4 or Zero-Emission locomotives) based on operators' usage and the health harms caused by their associated emissions;
2. Sets a 30-minute idling limit for locomotives with automatic idle controls to reduce neighborhood level exhaust;
3. Prohibits the use of locomotives in California after 23 years of age to reduce harms from the oldest, most polluting classes of locomotive engines as of 2030;
4. Requires zero-emission operation for new locomotives on the following schedules:
 - a. 2030: Switcher, industrial and passenger locomotives built on or after 2030 would need to operate in zero-emission mode while operated in California
 - b. 2035: Line Haul Class 1 locomotives built on or after 2035 would need to operate as zero-emission while operated in California.

² California Air Resources Board. Community Air Protection Program. Community Hub: Tracking progress of CARB actions to support Assembly Bill (AB) 617. Accessed October 26, 2022. <https://ww2.arb.ca.gov/capp-communities>

³ California Air Resources Board. Initial Statement of Reasons for the Proposed In-Use Locomotive Standard at p. 16. "DPM exposure leads to health effects, including premature death, hospitalizations, and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children; those most vulnerable to these health effects are children whose lungs are still developing and the elderly who often have chronic health problems." <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/locomotive22/isor.pdf>

We urge the board and staff to consider these elements of the rule as policy floors and to explore opportunities to accelerate timelines within the locomotive classes and further limit idling where possible to improve the health outcomes of the final rule.

Deliver Health Benefits of Cleaner Locomotives

As proposed, the in-use locomotive rule will significantly reduce cancer risk and is estimated to generate major public health benefits throughout California. The emission benefits will be especially critical in communities most impacted by rail pollution today. The CARB staff report estimates that the proposal will generate \$32.3 billion in (non-cancer) health benefits from 2024 to 2050 including:

- 3,233 lives saved
- 1,486 emergency room visits avoided
- 597 fewer hospital admissions for respiratory illness
- 500 fewer hospital admissions for cardiovascular illness

We thank you for your work on this regulation to ensure emissions are reduced from locomotives. Please contact William Barrett at the American Lung Association with any questions at William.Barrett@lung.org.

Sincerely,

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