

## **Comment 1 for Proposed Repeal of the In-Use Locomotive Regulation (2025locorepeal) - 45 Day.**

First Name: Umair

Last Name: Abbas

Email Address: Umair.siddiquie@gmail.com

Affiliation: Global Environmental Advocacy Group

Subject: Urgent Opposition to the Proposed Repeal of the In-Use Locomotive Regulation

Comment:

Dear Esteemed Board Members,

I am writing to vehemently oppose the proposed repeal of the In-Use Locomotive Regulation, a vital safeguard for our environment and public health. This regulation is not just a policy--it's a lifeline for communities burdened by the harmful emissions from locomotives. Repealing it would be a devastating step backward, jeopardizing the air quality and well-being of countless residents, especially in underserved areas near rail operations. The science is clear: locomotive emissions contribute significantly to air pollution, exacerbating respiratory illnesses, heart conditions, and environmental degradation. By maintaining this regulation, you have the power to champion cleaner technologies, reduce healthcare costs, and ensure a healthier future for generations to come. Repealing it, however, would signal a disregard for the urgent need to combat climate change and protect vulnerable populations. I implore you to act with foresight and responsibility. Strengthen, don't dismantle, this critical regulation. Show the public that you prioritize their health, their environment, and their future over short-term industry pressures. The stakes are too high for anything less. Thank you for heeding this urgent call to action. I trust you will make the right decision to preserve the In-Use Locomotive Regulation.

Sincerely,  
Umair Siddiquie

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2025-05-10 05:55:14

No Duplicates.

## **Comment 2 for Proposed Repeal of the In-Use Locomotive Regulation (2025locorepeal) - 45 Day.**

First Name: Quinn

Last Name: Rickert

Email Address: nv03xn5hy@mozmail.com

Affiliation:

Subject: Public Comment in Support of Repealing the In-Use Locomotive Regulation  
Comment:

I am writing to express my support for the California Air Resources Board's (CARB) proposal to repeal the In-Use Locomotive Regulation.

The primary reason for my support is the clarity this repeal will provide to all locomotive operators in California. As stated in the notice, the absence of the necessary Clean Air Act authorization from the Environmental Protection Agency for the original regulation created a situation of uncertainty.

Repealing the regulation, as proposed, will definitively clarify that locomotive operators in California are not required to comply with the provisions of the In-Use Locomotive Regulation. This clarity is essential for operators to make informed decisions and plan their operations effectively without the ambiguity of a regulation that lacks federal authorization.

Ensuring a clear and predictable regulatory environment is crucial, and this proposed repeal directly addresses that need. I commend CARB for taking this step to provide certainty to the affected industry.

Thank you for the opportunity to comment on this important matter.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2025-05-13 18:55:04

No Duplicates.

**Comment 3 for Proposed Repeal of the In-Use Locomotive Regulation  
(2025locorepeal) - 45 Day.**

First Name: Steve

Last Name: Roberts

Email Address: SteveRoberts@astound.net

Affiliation: Rail Passenger Association of California

Subject: Repeal of the In-Use Locomotive Regulation

Comment:

Attached please find comments from the Rail Passenger Association of California and Nevada (RailPAC) regarding the Repeal of the In-Use Locomotive Regulation. Thank you for the opportunity to comment on this matter.

Steve Roberts, President RailPAC

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-2025locorepeal-UDNXMFckUmNVDFQ9.pdf'

Original File Name: CARB In-Use Loco Reg RailPAC Comments 6-16-25.pdf

Date and Time Comment Was Submitted: 2025-06-16 14:13:42

No Duplicates.

## **Comment 4 for Proposed Repeal of the In-Use Locomotive Regulation (2025locorepeal) - 45 Day.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for Sierra

Subject: Comment By Sierra Northern Railroad and Sierra Railroad Company

Comment:

Dear Chair Randolph,

The attached letter and accompanying exhibits set forth Sierra Northern Railway's and Sierra Railroad Company's comments in support of the California Air Resources Board's Proposed Repeal of the In-Use Locomotive Regulation. Sierra Northern and Sierra Railroad appreciate the opportunity to provide these comments to CARB.

For more than a decade, Sierra Northern has directly engaged with CARB staff and leadership to collaboratively develop and implement an industry-informed, cost-effective, and feasible strategy for reducing greenhouse gas and criteria pollutant emissions in the short line railroad industry. In a landmark achievement in March of this year, Sierra successfully completed testing of the first four-axle hydrogen-fueled, zero emission switching locomotive in the U.S. at Sierra's railyard in West Sacramento as further described and illustrated in Exhibit A of this Comment.

Sierra Northern and Sierra Railroad support CARB's Proposed Repeal for multiple reasons. As stated in the Initial Statement of Reasons, the Proposed Repeal provides more certainty to California locomotive operators. In addition, the Proposed Repeal avoids protracted and expensive litigation. Most importantly, the Proposed Repeal enables the more rapid implementation of voluntary and commercially viable strategies to achieve criteria and GHG pollutant reductions in the short line rail industry.

Please see the attached comment and exhibits for Sierra Northern's and Sierra Energy's full comment.

Best Regards,

Graham Noyes

Noyes Law Corporation

419 Broad Street, Suite E

Nevada City, CA 95959

[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-2025locorepeal->

AnEFagFlBSRQJFU0.pdf

Original File Name: Sierra IUL Comment and Exhibits.pdf

Date and Time Comment Was Submitted: 2025-06-16 14:41:06

No Duplicates.

**Comment 5 for Proposed Repeal of the In-Use Locomotive Regulation  
(2025locorepeal) - 45 Day.**

First Name: bill

Last Name: magavern

Email Address: bill@ccair.org

Affiliation:

Subject: CCA Comment letter on Loco Rule Repeal

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-2025locorepeal-AmFSN1Y2BwtQNQlm.pdf'

Original File Name: CCA Comment letter on Loco Rule Repeal 6.16.25.pdf

Date and Time Comment Was Submitted: 2025-06-16 15:12:48

No Duplicates.

**Comment 6 for Proposed Repeal of the In-Use Locomotive Regulation  
(2025locorepeal) - 45 Day.**

First Name: Tyler

Last Name: Mosher

Email Address: tmosher@nctd.org

Affiliation: North County Transit District

Subject: NCTD Comment Letter on the Proposed Repeal of the In-Use Locomotive Regulation  
Comment:

Attached please find comments from the North County Transit District. Thank you for the opportunity to comment on this matter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-2025locorepeal-BmgFYFYjBDNXDgNv.pdf'

Original File Name: NCTD Letter of Support - Repeal of In-Use Locomotive Regulation.pdf

Date and Time Comment Was Submitted: 2025-06-16 16:44:33

No Duplicates.

**Comment 7 for Proposed Repeal of the In-Use Locomotive Regulation  
(2025locorepeal) - 45 Day.**

First Name: Clerk

Last Name: Board

Email Address: Non-web submitted comment

Affiliation: RailPAC

Subject: Proposed Repeal of the In-Use Locomotive Regulation

Comment:

Please see attached comment submitted to Clerk's Office via email  
for the 2025locorepeal docket during the comment period.

Sincerely,

Brian Yanity, Vice President-South

Rail Passenger Association of California and Nevada (RailPAC)

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-2025actpooling-  
UTNRJVE5WWtSOgVa.pdf'

Original File Name: Brian Yanity comment received via email.pdf

Date and Time Comment Was Submitted: 2025-06-17 11:18:12

No Duplicates.



## **Comment 1 for Proposed Repeal of the In-Use Locomotive Regulation (2025locorepeal). (At Hearing)**

First Name: Yessenia

Last Name: Moreno

Email Address: ymoreno@earthjustice.org

Affiliation: Earthjustice

Subject: CARB must double-down its efforts to reduce harmful pollution from rail.

Comment:

Please find attached a comment letter calling for CARB to double down its efforts to reduce harmful pollution from rail, submitted on behalf of environmental justice and environmental groups.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-2025locorepeal-VzQHYFMgUmNSCwJu.pdf>

Original File Name: CARB Letter re Loco Rule Repeal\_6.26.25\_Final.pdf

Date and Time Comment Was Submitted: 2025-06-26 15:41:51

No Duplicates.