

October 4, 2017

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The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Mail Code: 1101A
Washington, DC 20460

Dear Administrator Pruitt,

On behalf of the National Association of Clean Air Agencies (NACAA) we write to express our support for more rigorous federal emission standards for locomotives, which contribute substantially to air quality and public health problems nationwide.

NACAA is a national, non-partisan, non-profit association of state and local air pollution control agencies in 45 states, the District of Columbia and four territories. The members of NACAA have primary responsibility under the Clean Air Act for implementing our nation's clean air program. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. This letter is based upon that experience. The views expressed in this letter do not necessarily represent the positions of every state and local air pollution control agency in the country.

NACAA has a long record of support for federal measures to reduce emissions from locomotives, and more stringent, health-protective standards for remanufactured locomotives and a Tier 5 standard for new locomotives that would include zero-emission operation capability are consistent with that record. Accelerating current locomotive standards would improve air quality everywhere in the country by reducing emissions of oxides of nitrogen, a precursor to ozone and fine particulate matter, and protect public health by reducing diesel particulate matter emissions.

NACAA believes technologies to significantly reduce emissions from line-haul, switch and passenger rail operations can be deployed on both new and existing locomotives to provide critical emission reductions along rail lines and in communities near rail yards.

The Clean Air Act precludes states and localities from regulating emissions from locomotives. Lacking this authority, state and local air agencies are entirely dependent on the U.S. Environmental Protection Agency (EPA) to set federal standards that will reduce emissions from this source category. Any state or local agency may petition EPA to adopt new or more stringent federal standards for a particular source category.

On April 13, 2017, the California Air Resources Board (CARB) submitted a petition to EPA requesting that the agency exercise its authority to develop and promulgate more stringent federal emission standards for new and remanufactured locomotives that would not only help state and local air agencies across the country achieve and sustain clean air goals but, more importantly, also translate into significant public health and welfare benefits throughout the nation. NACAA supports CARB's petition.

If you have any questions, please contact either of us or Nancy Kruger, Deputy Director of NACAA.

Sincerely,



Steven E. Flint
(New York)
Co-Chair
NACAA Mobile Sources and Fuels Committee



Erik C. White
(Auburn, CA)
Co-Chair
NACAA Mobile Sources and Fuels Committee

cc: Sarah Dunham (Acting Assistant Administrator, EPA Office of Air and Radiation)
Christopher Grundler (Director, EPA OAR Office of Transportation and Air Quality)
Richard Corey (Executive Officer, California Air Resources Board)