

July 10, 2024

Hon. Representative Greg Stanton
207 Cannon HOB
Washington, DC 20515

Re: EPA-HQ-OAR-2023-0574 California Air Resources Board (CARB) Clean Air Act Authorization Request

Representative Stanton,

We are writing to express concerns regarding the proposed waiver from federal law that would allow the California Air Resources Board (CARB) to enforce zero-emission railroad locomotives beginning in 2030. While this proposal is specific to California, it has broader implications for rail operations in Arizona and across the nation, potentially setting a precedent for other states to adopt similar regulations and disrupting rail interconnectivity.

Our region's economy is growing, and local and state leaders rely on our rail network to handle this growth sustainably, benefiting both the environment and the quality of life in our communities. However, the CARB rule threatens Arizona's railways and the resilience of the supply chain by imposing significant operational burdens on railroads.

If other states adopt the locomotive rule, as possible if authorized by the EPA, it would create a fragmented regulatory landscape, hindering rail interconnectivity, efficiency, and increasing operational costs. Higher rail costs would shift the freight market, driving goods away from railways and onto Arizona highways, increasing emissions and congestion on publicly funded roadways.

Arizona's economy is particularly tied to the goods moving in and out of Southern California ports. These connections power industrial development, such as the future PIRATE facility in Mesa. Unworkable and costly policies made by California will quickly impact the entire system, undermining rail investment and expansion in Arizona when it is most needed.

We urge the EPA to carefully evaluate the potential consequences of approving the CARB regulation and to reject the waiver. If you have questions, please reach out to my office at (480) 644-3004 or District4@mesaaz.gov.

Sincerely,



Jennifer Duff
Councilmember, District 4



Julie Spilsbury
Councilmember, District 2



Mark Freeman
Councilmember, District 1