



Office of the Metropolitan Council

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July 2, 2024

The Honorable Troy Carter
United States Representative
Louisiana 2nd Congressional District
442 Cannon House Office Building
Washington D.C., 20515

Dear Congressman Carter:

I am writing to bring to your attention a critical issue that could significantly impact transportation in the Baton Rouge area. The Environmental Protection Agency (EPA) is currently evaluating the "In-Use Locomotive" rule proposed by California's Air Resources Board (CARB) for a Clean Air Act waiver. CARB requires this waiver to enforce its proposed regulation.

The policy aims to prohibit locomotives older than 23 years from operating in California by 2030 and mandates the use of "zero-emissions" locomotives, which, in reality, do not yet exist. This policy overlooks the fact that locomotives have lifespans that last for decades. Furthermore, the "zero-emissions" standards prescribed by California are based on prototype technologies that are not ready for daily use. There are approximately 25,000 locomotives on the national network, with about 60 percent passing through California annually. Even if the technology were available, we currently lack the capacity to retrofit and manufacture enough locomotives within the specified timeframe. Essentially, this regulation would ban thousands of locomotives from accessing the West Coast.

Should thousands of locomotives be barred from operating in California, the supply chain attempting to access West Coast ports and distribution centers would face significant disruptions, resulting in delays and increased costs for consumers and local businesses. Additionally, if the EPA approves the CARB regulation, other states might follow suit, leading to a patchwork of different state regulations. It is inappropriate for a California agency to dictate transportation policy for Louisianans.

The impact of this policy on the Baton Rouge area could be especially severe. As a major east-west freight junction, Baton Rouge relies heavily on rail access. If the western rail network can no longer reliably access California, eastern shippers may resort to transporting more cargo by truck, leading to increased congestion, pollution, and wear and tear on our roadways. Reliable rail access is crucial to the port, supply chain, and businesses throughout the region, and a national supply chain disruption will have significant downstream effects on our community.

Page 2

I urge you to closely monitor this policy and its potential impacts on Baton Rouge. Please advocate for the EPA to reject this waiver request. Thank you for your due diligence and consideration.

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a final horizontal stroke, positioned above the printed name.

Rowdy J. Gaudet
East Baton Rouge Metro Council
District 3