

GRAND RAPIDS CHAMBER

The Honorable Hillary Scholten
1317 Longworth House Office Building
Washington, DC 20515

July 9, 2024

Dear Representative Scholten,

We write to express our concerns about the potential harms our state and local employers will face if the EPA approves the California Air Resources Board (CARB) Clean Air Act Authorization Request [EPA-HQ-OAR-2023-0574]. This rule will negatively impact the U.S. logistics network, with Michigan being disproportionately affected due to its key role in the national flow of goods.

We are equally concerned about the rule's impact on cross-border trade with Canada. The United States and Canada enjoy the world's largest and most comprehensive trading relationship that supports millions of jobs in each country and constitutes a \$1.95 trillion bilateral trade relationship. According to USDOT, over 11% of this trade, or \$214 billion, is facilitated by rail. Allowing California and other states to set their own rules would undermine this trade and millions of jobs in Michigan and nationwide.

Freight rail is the most fuel-efficient mode of moving goods on land and 75% more fuel-efficient than trucks. Rail currently carries about 40% of U.S. long-distance freight while contributing just 1.7% of transportation-related emissions of greenhouse gases. In fact, the CARB regulation could lead to more carbon emissions over time. CARB has acknowledged that high compliance costs would likely force many short lines to cease operating, cutting some rural communities off from vital rail service entirely. Michigan is home to 25 short line railroads that would be replaced with trucks if compromised.

Michigan's freight rail infrastructure connects our manufacturers and farmers to domestic and foreign customers. Our 29 privately owned freight railroads cover more than 3,400 miles, moving 73.6 million tons of freight in 2021 – the equivalent of 4.1 million truck loads.

By mandating unviable zero-emission locomotive technology starting in 2030, the CARB Clean Air Act Authorization Request would disrupt interstate commerce as well as international trade, costing jobs and economic opportunity. Please support Michiganders by urging the EPA to reject the CARB waiver.

Sincerely,



Joshua Lunger
Vice President of Government Affairs

GRAND RAPIDS CHAMBER

The Honorable Gary Peters
Hart Senate Office Building
Suite 724
Washington, D.C. 20510

July 9, 2024

Dear Senator Peters,

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Joshua Lunger
Vice President of Government Affairs

GRAND RAPIDS CHAMBER

The Honorable Debbie Stabenow
731 Hart Senate Office Building
Washington, D.C. 20510-2204

July 9, 2024

Dear Senator Stabenow,

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Joshua Lunger
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