



May 22, 2017

The Honorable Scott Pruitt, Administrator  
U.S. Environmental Protection Agency  
Office of the Administrator, Mail Code: 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

RE: Development and Promulgation of a Tie 5 Locomotive Standard

Dear Administrator Pruitt:

The San Bernardino County Transportation Authority (SBCTA) wishes to express its support for the California Air Resource Board's (ARB) petition to the United States Environmental Protection Agency (USEPA) to develop and promulgate a Tier 5 standard for locomotives.

SBCTA is the regional transportation planning agency for the largest geographic county in the continental U.S. The agency serves 24 cities and the County of San Bernardino, with a population of approximately 2.1 million residents. The County is also part of the four-county region comprising the South Coast Air Quality Management District (SCAQMD).

As you are aware, the South Coast Air Basin remains an extreme non-attainment area for ozone. Although the Basin has made astonishing progress on improvements to air quality since 1990, large areas of the Basin do not meet current ozone standards. In addition, a substantial portion of San Bernardino County's economy is based on logistics, distribution and freight transportation. Our area serves the regional and national economies by being a gateway for goods to and from the Los Angeles and Long Beach port complex. Some 40% of the nation's containerized freight comes through these ports, and an estimated 75% of that flows out of the state, the bulk of which is transported through San Bernardino County.

With that in mind, it's not surprising that the County is very focused on both improving air quality and supporting the significant logistics-based industry that drives the region's economy. However, current locomotive operations contribute to the region's mobile-source based NOx emissions, the primary precursor to ozone. Encouraging the development of a Tier 5 locomotive standard to a zero or near-zero level will signal the opportunity for manufacturers to create the technology to achieve the emission reductions needed from the rail industry.

We would be delighted to discuss these matters further, at your convenience. Feel free to contact me via email at [rwolfe@gosbcta.com](mailto:rwolfe@gosbcta.com) or by phone at (909) 884-8276.

Sincerely,

Dr. Raymond W. Wolfe  
Executive Director,  
San Bernardino County Transportation Authority