



American Short Line and Regional Railroad Association

Friday, May 29, 2026

The Honorable Gary Palmer
Chair
House Energy & Commerce Subcommittee on Environment
U.S. House of Representatives
Washington, DC 20515

The Honorable Paul Tonko
Ranking Member
House Energy & Commerce Subcommittee on Environment
U.S. House of Representatives
Washington, DC 20515

Dear Chair Palmer and Ranking Member Tonko:

On behalf of the American Short Line and Regional Railroad Association (ASLRRA), which represents the nation's approximately 600 small business freight railroads and railroad suppliers, we write to express our strong support for H.R. 3194, the Lifting Overburdensome Commerce Obstructions and Motives (LOCOMOTIVES) Act, introduced by Representatives John Moolenaar (R-MI), Jay Obernolte (R-CA), and Craig Goldman (R-TX). On May 15, 2025, a companion bill, S. 1779, was introduced in the Senate by Sen. Joni Ernst (R-IA). S. 1779 has 26 cosponsors and is pending consideration in the Senate Environment & Public Works Committee.

This legislation would provide important regulatory certainty for interstate freight rail operations by clarifying that states may not seek waivers under the Clean Air Act to impose locomotive emission standards more stringent than federal requirements. Maintaining a consistent national regulatory framework is critical for the freight rail industry, particularly for small business short line railroads that operate across state and regional supply chains.

In 2023, the California Air Resources Board (CARB) requested a waiver from the Environmental Protection Agency (EPA) for its In-Use Locomotive Regulation. ASLRRA strongly opposed that request because the regulation would have imposed unrealistic compliance timelines, substantial financial burdens, and operational requirements that are not technologically feasible for many small railroads. Had it been implemented, the rule would have threatened the viability of some short line railroads operating in California and disrupted essential freight service relied upon by local industries, manufacturers, agricultural producers, and shippers.

While freight railroads remain committed to environmental stewardship and continued emissions reductions, locomotive regulation must remain nationally uniform and technologically achievable. Interstate rail transportation is inherently federal in nature, and a patchwork of state-specific locomotive

requirements would create significant operational, legal, and economic challenges for rail carriers and the broader supply chain.

The LOCOMOTIVES Act appropriately addresses this concern by closing a loophole in current law that could allow one state to effectively establish a de facto national locomotive standard outside the existing federal regulatory framework. ASLRRA joins the Association of American Railroads, the Supply Chain Federation, and numerous stakeholders across the freight transportation sector in supporting this legislation.

We appreciate the Subcommittee's attention to this important issue and respectfully urge Congress to support the LOCOMOTIVES Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Baker', written in a cursive style.

Chuck Baker
President
American Short Line and Regional Railroad Association (ASLRRA)

CC: House Energy & Commerce Committee