

November 14, 2024

The Honorable Mike Lee
363 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Troy E. Nehls
1104 Longworth House Office Building
Washington, D.C. 20515

Dear Senator Lee and Congressman Nehls:

On behalf of the Intermodal Association of North America (IANA), a leading transportation trade association representing the combined interests of the intermodal freight industry, I am writing to express our support for the *Stop California from Advancing Regulatory Burden Act*, or the *Stop CARB Act* (S. 5038 and H.R. 9574).

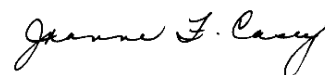
As the only transportation trade association that represents the combined interests of intermodal freight providers and customers, IANA has more than 1,000 corporate members, including railroads, ocean carriers, ports, intermodal truckers and over-the-road highway carriers, intermodal marketing and logistic companies, and suppliers to the industry. IANA's associate (non-voting) members include shippers, academic institutions, government entities, and non-profit trade associations.

Regulatory consistency enables interstate commerce, allowing freight operators to move across states safely, efficiently, and cost effectively. The California Air Resources Board's (CARB) numerous waiver requests to federal law undermine the importance of a national regulatory approach that has benefitted the intermodal industry and consumers alike. Of particular consequence to freight movement, CARB's requested waivers pertaining to its In-Use Locomotive Regulation and the Advanced Clean Fleets (ACF) Regulation stand to upend the seamless flow of goods as operators would be forced to use different equipment in the state of California. In addition to the national fluidity challenges these regulations would pose if such waivers were granted, CARB's regulations also call for the purchase of equipment that is not yet commercially available in some instances.

The Stop CARB Act would restore a unified, federal regulatory approach by repealing California's waiver exemption. Recognizing that states have unique needs and challenges that may be addressed through their respective governing bodies, the federal government is charged with regulating interstate commerce through the Constitution. A departure from such governance will result in increased costs, transit times, and potentially, increased environmental impact due to the rerouting of freight.

IANA applauds your leadership on this important legislation. If I can be a resource on this topic, please do not hesitate to contact me at jcasey@intermodal.org or 301-982-3400 ext. 349.

Sincerely,



Joanne F. Casey
President and CEO
Intermodal Association of North America

CC: Stop CARB Act Co-Sponsors