



October 28, 2025

U.S. Environmental Protection Agency

William J. Clinton Building

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Dear U.S. Environmental Protection Agency:

The undersigned health and medical organizations write to identify an opportunity for meeting EPA's first pillar of Clean Air, Water and Land for Every American. We ask to work with you to reduce harmful air pollution from the nation's aging locomotive fleet.

The United States is ready for new locomotive standards that can greatly improve public health and reduce cancer risk. As you know, locomotives emit oxides of nitrogen (NOx), carcinogenic diesel particulate matter and fine particulate matter. Over 13 million Americans live and work near major rail operations, where they breathe air contaminants that trigger illness, hospitalization and premature death. ¹

Many of the nation's locomotives are long overdue for upgrades to cleaner, more efficient technology. Data supporting EPA's 2020 National Emission Inventory shows that Class I, II

¹ United States Environmental Protection Agency. Summary and Analysis of Comments: Control of Emissions of Air Pollution from Locomotive Engines and Marine Compression Ignition Engines Less than 30 Liters Per Cylinder. March 2008. [Summary and Analysis of Comments: Control of Emissions of Air Pollution from Locomotive Engines and Marine Compression-Ignition Engines Less than 30 Liters per Cylinder \(EPA420-R-08-006\)](#)

and III line-haul fleets are dominated by Tier 2 and earlier standards from over 25 years ago. Of the 16,787 locomotives in Class I line-haul fleets, only 7% meet the more efficient Tier 4 standards – standards that were adopted a generation ago.²

EPA has an opportunity to set new targets for emissions that reflect new technologies and the ongoing investment and deployment of zero-emission technologies. A “Tier 5” standard that ensures clean-up is long overdue.

While Tier 4 locomotive standards reduce harmful particulate matter by 90% and NOx emissions by 80% compared to their Tier 2 counterparts, it is clear these standards are not driving change in the nation’s fleet.³ Due to regulatory loopholes, the oldest and dirtiest engines continue to be remanufactured with emissions standards effectively frozen in the time of their original manufacture. This failure to modernize puts railroad workers and nearby communities at continued risk of significant health harms such as asthma attacks, heart attacks and strokes. EPA has an opportunity to close these loopholes and finally require older, high-polluting locomotives to meet stronger, up-to-date standards requiring modern technology.

Advancing public health, reducing cancer risk and pushing the rail sector toward a cleaner and more efficient future is of the utmost importance, and we urge EPA to act without delay to modernize emissions standards for locomotives through a new Tier 5 standard that avoids endless rebuilds of dirtier engines and reflects the growth of modern technologies in this field.

Signed,

Alliance of Nurses for Healthy Environments

American Academy of Pediatrics

American College of Chest Physicians

American College of Physicians

American College of Physicians California Services Chapter

² Federal Register. Locomotives and Locomotive Engines; Preemption of State and Local Regulations. November 2023. [Federal Register :: Locomotives and Locomotive Engines; Preemption of State and Local Regulations](#)

³ United States Environmental Protection Agency. Information about EPA Strategies to Reduce Air Pollution from Locomotives. November 2022. [Information about EPA Strategies to Reduce Air Pollution from Locomotives - Regulatory Update \(EPA-420-F-22-030, November 2022\)](#)

American Lung Association
American Public Health Association
American Thoracic Society
Asthma and Allergy Foundation of America
Breathe California
Breathe California Sacramento Region
Breathe Southern California
California Nurses for Environmental Health and Justice
California Thoracic Society
Children's Environmental Health Network
Climate Health Now
Climate Psychiatry Alliance
Connecticut Health Professionals for Climate Action
Faith in Place
Illinois Clinicians for Climate Action
International Society for Environmental Epidemiology
Mothers & Others for Clean Air
New Jersey Association of County and City Health Officials
New Jersey Environmental Health Association
New Jersey Society for Public Health Education
New Jersey State Society of Physician Assistants
Oncology Advocates United for Climate and Health International
Physicians for Social Responsibility
Regional Asthma Management & Prevention