



## Problem

Between 1991 and 1997, America's freight railroads and Amtrak faced sweeping regulatory proposals from federal, state, and local agencies to reduce locomotive emissions, especially in Southern California. The Association of American Railroads (AAR), the railroads' trade organization, wanted to pursue cost effective solutions and avoid costly interventions. AAR wanted to achieve uniform national regulations based on the appropriate statutory authorities and the limits of known technologies, while avoiding a patchwork of different state and federal regulations. The railroads also sought to build support for this approach from a coalition of state and federal regulators, politicians, unions, and shippers.

## Solution

CEA worked with industry, government, and environmental groups to find a long-term solution that served the needs of all parties. Specifically, CEA:

- Coordinated the railroad industry's position before five agencies at the federal, state, and local levels by incorporating policy, legal, technical, and communications perspectives.
- Served as the project manager of a cross-functional team of railroad officials to comprehensively assess the impact of the various regulatory initiatives.
- Initiated dialogue and educated key decision makers to build trust and develop a mutual understanding between regulators and railroad executives.
- Developed an economic and technical analysis of various proposals to determine their impact on the railroad industry and emissions in the Los Angeles area.
- Worked with AAR staff and advisors to build consensus among the nation's railroads for a proposal to regulate emissions in a comprehensive yet practical manner.
- Helped to shape a successful communications campaign to educate the public and government officials about the advantages of rail transportation.

## Results

Working with legal counsel, technical experts, and AAR staff, CEA helped the railroads establish consensus among state and federal regulators that a comprehensive nationwide regulatory scheme was the only appropriate structure for the regulation of locomotive emissions. In December 1997, EPA promulgated a locomotive emissions regulation that, when fully implemented, would avoid conflicting state and local requirements and would establish an aggressive yet achievable emissions reduction program over the next fifteen years.