



LOS ANGELES AREA
CHAMBER OF COMMERCE

July 7, 2016

Elaine Houmani
CFAC Coordinator
Office of Freight Planning, Division of Transportation Planning
California Department of Transportation
1120 N Street - MS 32
P.O. Box 942874
Sacramento, CA 94274-0001

RE: 2016 CALIFORNIA SUSTAINABLE FREIGHT DRAFT ACTION PLAN

Dear Ms. Houmani:

On behalf of the Los Angeles Area Chamber of Commerce, our more than 1,650 members and the more than 650,000 people they employ throughout the region, we would like to submit a few comments in response to the California Sustainable Freight Draft Action Plan (Action Plan); the document represents a significant benchmark in the development of comprehensive freight and the goods movement sector policies and programs, in addition to environmental needs while promoting economic growth and well-being for all Californians.

The following comments are a collection of the Chamber's stakeholders from the goods movement sector which aided us in developing what we refer to as "guiding principles" below, which we hope the final Action Plan will reflect: (1) **No Declining Facility Caps**; we do not support regulatory proposals that will place emissions caps on facility operations. Facility Emissions Caps effectively limit throughput and economic activity, and this concept is antithetical to supporting California's competitiveness as a global trade gateway and should not be included in the final action plan. (2) **No Stranded Assets**; CARB should assure companies that they will be able to fully amortize past and future investments in technology for the useful life of the equipment, avoiding stranded assets. If an industry is required to buy new technology/equipment, they should be permitted to use that equipment for its useful life. (3) **Do no harm**; the Action Plan must assure that the transition to new technologies will not be made at the expense of jobs. (4) **No Technology before proven in use**; new technologies must be safe, proven, and reliable to ensure the supply chain system continues to deliver a product that meets customer, community, and regulatory needs. (5) **Economic importance of the Goods Movement sector**; small businesses rely on the Ports; secure employment for those with HS diploma or less.

With the goods movement sector contributing to nearly one-third of the regional economy, efficient transportation of goods through transit corridors and arterials is especially significant to the region in order to maintain competitive, thriving economy. The Chamber applauds DOT efforts in composing a substantive, comprehensive document. We look forward to continue working with you.

Sincerely,

A handwritten signature in cursive script that reads "Gary Toebben".

Gary Toebben
President & CEO