



July 6, 2016

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RE: 2016 CALIFORNIA SUSTAINABLE FREIGHT DRAFT ACTION PLAN

To the Interagency Partners:

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 are submitting 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 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, which aided in developing what we refer to as "guiding principles", 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**; reliance on the ports, especially from small business; 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 arterials is especially significant in order to maintain a competitive, thriving economy. Thank you for your efforts. We look forward to continue working with you.

Sincerely,

Gary Toebben
President & CEO