March 31, 2017

Hon. Jerry Brown, Governor
State of California
State Capitol
Sacramento, CA 95814

Re: Air Resources Board Actions in Contradiction to Administration Policies and the Principles of the Sustainable Freight Action Plan

Dear Governor Brown:

It is with great disappointment that the undersigned organizations and businesses submit this letter to you.

Your Sustainable Freight Action Plan specifically concluded that “[t]here is no direction to implement a freight facility performance targets measure in either ARB’s Mobile Source Strategy or Proposed 2016 State Strategy for the State Implementation Plan.” On Thursday, March 23rd, the Air Resources Board (ARB) reversed course, without any public notice, public participation, or analysis from its staff, and adopted Resolutions 17-7 and 17-8, contrary to this critical Freight Plan policy, as part of its approval of the 2016 state SIP.

These resolutions are a direct rejection of the Sustainable Freight Action Plan, your Executive Order, and local concerns expressed in the South Coast Air Quality Management Plan.

Since 2014, a broad coalition of freight stakeholders, representing one-third of the State’s economy and jobs, consistently expressed concern with Indirect Source Rules (ISRs) and freight facility performance targets. The imposition of these types of measures will limit investment in California’s transportation infrastructure, reduce jobs, hurt the competitiveness of California’s freight system, increase vehicle miles traveled and overall emissions, especially GHGs, decrease freight system efficiency, and ultimately delay emissions reductions.

Given these actions by the Board, just months after your Sustainable Freight Action Plan was finalized, we request your assistance in restoring the integrity of the Plan, your policies, and the process. If CARB’s actions are allowed to stand, the goodwill and collaborative process supporting the Administration’s climate and transportation infrastructure policies will be badly damaged. We respectfully request that you direct the Board to reconsider its action, pass a State Implementation Plan without any facility-based measures, and act in a manner from this point forward consistent with the Sustainable Freight Action Plan.

We request a meeting regarding this serious matter with your office as soon as possible.

Sincerely,
American Trucking Association
BizFed - Los Angeles County Business Federation
BNSF Railway Company
California Association of Port Authorities
California Business Properties Association
California Farm Bureau Federation
California Retailers Association
California Short Line Railroad Association
California Trucking Association
Coalition for Responsible Transportation
Foreign Trade Association
Future Ports
Harbor Association of Industry and Commerce
Harbor Trucking Association
Inland Empire Economic Coalition
International Council of Shopping Centers
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Maersk Line
NAIOP of California, the Commercial Real Estate Development Association
NAIOP Inland Empire
NAIOP SoCal
National Retail Federation
Pacific Merchant Shipping Association
Retail Industry Leaders Association
San Gabriel Valley Economic Partnership
South Bay Association of Chambers of Commerce
SSA Marine
Union Pacific Railroad

cc: Ms. Nancy McFadden, Executive Secretary
Mr. Mike Rossi, Senior Advisor for Jobs & Business Development
Chair Mary Nichols, Air Resources Board