



September 17, 2021

Chair Laura Shell and Honorable Commissioners
Los Angeles County Regional Planning Commission
VIA ELECTRONIC SUBMISSION

Re: Draft Green Zones Ordinance

Dear Chair Shell and Honorable Commissioners:

On behalf of the California Retailers Association (CRA), I wish to express our significant concern with the proposed Los Angeles County Revised Draft Green Zones Ordinance. The ordinance creates new and imprecise development standards which will introduce more uncertainty in the already lengthy conditional use permit process while providing only marginal benefits. We are concerned the proposed ordinances lack understanding about how these facilities operate and lack legal authority to regulate mobile sources during a time when our supply chain is already stretched thin.

The California Retailers Association is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, on-line marketplaces, restaurants, convenience stores, supermarkets and grocery stores, chain drug, and specialty retail such as auto, vision, jewelry, hardware, and home stores. CRA works on behalf of California's retail industry, which prior to the pandemic operated over 400,000 retail establishments with a gross domestic product of \$330 billion annually and employs over 3 million people—one fourth of California's total employment.

Requiring in the immediate term that no less than 15 percent of trucks used in warehouse operations be zero-emission or near zero-emission on-road haul trucks is not practical. The technology is still not available for most on-road trucks and there are no heavy-duty electric trucks presently available nor expected in the next five years that are viable options. Further complicating this issue is the fact that many warehouse facilities do not own on-road truck fleets and do not control the fleets of companies that move goods. In most cases, the facility operator has zero control over the vehicles that will be moving products. Moreover, the issue of mobile-source pollution is not within the County's authority but is rather the domain of the California Air Resources Board (CARB).

The proposed ordinance will also restrict outdoor operations of all covered activities within certain hours of the day, which is an unrealistic hinderance to shipping and receiving of goods specifically in sectors with perishable items. Many facilities don't have the physical ability to receive all of their

deliveries at once and rely on a schedule that keeps goods coming in and out to keep the shelves stocked. This time constraint would also force hundreds of trucks to travel during peak traffic times or sit in idle somewhere until a delivery can be received.

The commercial/industrial and distribution industry provides a broad range of well-paying jobs for those of every level of education and skillset. This proposal comes at a time when numerous other jurisdictions are implementing major new regulations, restrictions, and fee on warehousing of their own, including CARB, the South Coast AQMD and possibly the State Legislature. We urge the Regional Planning Commission to analyze the costs, realistically assess environmental consequences, and review the impacts on the families of the workers and the supply chain of this proposal, and in the context of recently enacted measures by other jurisdictions.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve McCarthy". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Steve McCarthy
Vice President, Public Policy