

Good morning, Chair Delgado and members of the Governing Board. My name is Jacob Brint, and I represent the California Retailers Association. The California Retailers Association is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, convenience stores, supermarkets and grocery stores, chain drug, and specialty retail such as auto, vision, jewelry, hardware and home stores. The California Retailers Association works on behalf of California's retail industry, which currently operates over 164,200 stores with sales in excess of \$571 billion annually and employing 2,776,000 people— nearly one fifth of California's total employment.

We represent national retailers that depend on reliable and efficient port operations to keep store shelves stocked and meet consumer demand. We support the Cooperative Agreement as drafted by the Ports of Long Beach and Los Angeles because it delivers actual emissions reductions without disrupting the supply chain that millions of businesses and families rely on.

Proposed Rule 2304 would impose regulatory uncertainty, slow infrastructure investment, and risk driving cargo to other, less heavily regulated ports and states. That change in cargo destination means higher prices, longer delays, and fewer choices for consumers. I urge the Board to pause the rulemaking process and instead direct staff to engage in negotiations with the Cities and Ports on a collaborative, enforceable agreement, one that could be ready for consideration by the Harbor Commissions and this Board by October.

The Ports' proposal includes clear commitments: funding for zero-emission trucks, electrification of equipment, and significant workforce training investments – all without compromising cargo flow. I would add that it contains real emissions reductions, unlike PR 2304. If the goal is to clean the air, then the Cooperative Agreement is a significantly better solution. Let's continue on the path of collaboration and results, not confrontation and risk.

The California Retailers Association urges you to support the Cooperative Agreement and reject a one-size-fits-all rule that puts our economy in jeopardy. Thank you.