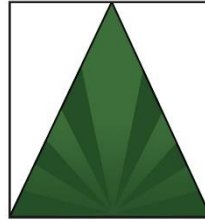


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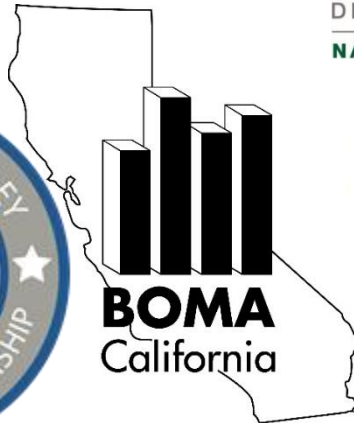
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International Council of Shopping Centers



March 24, 2020

Mr. Richard Corey  
Executive Officer  
California Air Resources Board  
P.O. Box 2815  
Sacramento CA 95812

**RE: Transport Refrigeration Unit Regulation**

Dear Mr. Corey:

Given the unprecedented events related to the COVID-19 virus outbreak which are confronting the State of California and the nation, the undersigned organizations request an immediate pause to your agency's development of its Transport Refrigeration Unit Regulation. This pause will allow the companies affected by the proposed regulation to focus on ensuring the nation's supply chain provides essential goods like food, beverages and medicine to the residents of the state. Although the duration of this event is unknown, we believe a delay is warranted and appropriate.

As you are aware, draft regulatory language was first released on March 12, 2020 for a two-week comment period. Much has happened since this release including social distancing, school closures, work-from-home requirements, and stay-in-place orders. Operational impacts have been especially acute in the industry sectors subject to this regulation, including grocers, retailers, food distributors and refrigerated fleets.

While our organizations would like to continue to work with your staff on the development of the regulation, these efforts to minimize the spread of the virus are limiting our ability to provide additional information. For example, while we would like to have CARB staff visit cold storage warehouses to discuss how the proposed language would impact these facilities, it is simply not possible at this time. In addition, collecting and submitting data to support changes to the proposed language cannot be a priority at this time.

Finally, even when the extraordinary public health protection measures being enacted at this moment ease, it is widely believed that the precipitous drop in economic activity tied to these events will result in a prolonged recessionary period which will likely coincide with the rule's largest capital expenditures to achieve compliance.

The efforts to keep us safe, healthy and supplied are shared by government, private citizens and businesses alike. The members of our organizations will continue to do their part in these difficult times. In this current crisis, we ask for your help in allowing us to focus on supplying the State of California, together, by temporarily pausing rule development.

Respectfully,

California Trucking Association  
American Trucking Associations

Agricultural and Food Transporters Conference  
BOMA California  
Britton Konynenburg Partners  
California Business Roundtable  
California Chamber of Commerce  
California Food Producers  
California Grocers Association  
California Manufacturers & Technology Association  
California Railroads  
California Retailers Association  
Glendora Chamber of Commerce  
Inland Action  
International Council of Shopping Centers  
La Verne Chamber of Commerce  
Los Angeles County Business Federation  
Majestic Realty Co.  
NAIOP of California  
Pacific Merchant Shipping Association  
Pacific Mountain Logistics  
San Gabriel Valley Economic Partnership  
Sierra Pacific Warehouse Group  
Western Growers