



April 20, 2014

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

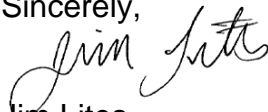
**RE: Comments for the California Air Resources Board Sustainable Freight
“Pathways to Zero and Near-Zero Emissions” Discussion Draft**

Dear Chairwoman Nichols:

On behalf of the California Airports Council (CAC), we write to express our appreciation for the time and effort dedicated by the Air Resources Board (ARB) to prepare the sustainable freight discussion draft for stakeholder review and comments. The CAC is comprised of the 33 commercial service airports in the state, facilitating over 190 million passengers in 2014. Eleven of our member airports rank in the top 100 busiest airports in the nation and altogether our airports handle over 12% of the nation’s airline passenger traffic.

The CAC supports the study of zero and near-zero emission technologies as well as implementation of incentives that support a low-carbon future for California’s transportation system of passenger and freight movement. However, as the ARB continues investigation towards a sustainable freight solution, we **strongly** encourage forming a collaborative partnership with more airports and airlines to ensure future policies and regulations do not negatively affect commerce for our industry. Per the Clean Air Act, 42 U.S.C. § 7401 et seq., the Federal Aviation Act, 49 U.S.C. § 40101 et seq., and the Airport Noise and Capacity Act, 49 U.S.C. § 47521 et seq., state regulation of aircraft and aircraft engines and of airport emissions that impinges upon aircraft operations is federally preempted. It is imperative that strategies for sustainable freight must not be in conflict with directives of the Federal Aviation Administration.

Thank you for this opportunity to provide comments. We look forward to working with the ARB to discuss best options for emission reductions in California’s aviation infrastructure and equipment as we have more time to review the discussion draft.

Sincerely,

Jim Lites
Executive Director

1510 14th Street, Sacramento, CA 95814
Tel. 916.553.4999 Fax 916.447.4947
www.calairportscouncil.org