**MAJESTIC REALTY CO.**

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April 19, 2006

Ms. Catherine Witherspoon
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
VIA FACSIMILE: (916) 322-3928

Dear Ms. Witherspoon:

Thank you for the opportunity to provide additional comments to the Proposed Emission Reduction Plan for Ports and Goods Movement in California (Plan) as it is considered by the California Air Resources Board at the upcoming meeting on April 20-21, 2006. We appreciate all the dedicated service and hours of hard work that is evident in the Plan and also appreciate the opportunity to participate with you as a member of the Goods Movement Integration Committee over the past year. We look forward to continuing to work with you to further develop and refine a comprehensive plan to meet our mutual objectives and the clear goal of Governor Schwarzenegger to attain clean air and promote goods movement throughout California.

Majestic Realty Co. believes strongly that the goods movement and logistics industry is a vital sector of the state and nation's economy. Essential infrastructure must be developed to move goods from California's ports to serve our population's needs, as well as the rest of the country. We share your goal of identifying effective solutions and pursuing every means possible to achieve these solutions, but we question the timing of an emission plan without a goods movement plan

From our perspective, we all suffer from the inefficiencies of the "silo" mentality of our elongated supply chain with its limited capacities. What we all need is a coordinated goods movement system. We strongly believe that we must work collaboratively with the system stakeholders, neighboring communities, environmental groups, and labor to develop a cleaner environment and efficient goods movement. There is no "us versus them" – we must all strive together to build a strong economy and clean the air as these goals are not mutually exclusive, rather, a necessity for all of us. We all live and work here. We must achieve our solutions together.

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We have a few concerns/suggestions and hope that we can engage in mutual dialogue as you further refine the Plan. First, the underlying technical analyses seem to be in question. Since the proposed regulations and solutions are largely based on these analyses, it seems prudent to engage in extensive peer review to make certain that the assumptions are accurate. The solution strategies will likely be less effective with inaccurate or incomplete information and/or measurement tools. We rely heavily on the technical analyses provided by your staff, but recognize that there are many technical resources from the various stakeholders that might shed more light on possible solutions.

Secondly, we question why the existing OEHHA/CARB procedures for evaluating Diesel Particulate Matter emissions were ignored. We could not find an explanation for why the risk assessment presented in the Plan sharply deviated from procedures that would be applicable to other sources of diesel emissions. Consequently, health risks from sources related to Goods Movement cannot be fairly compared to health risks from other sources since the analyses and evaluations will be different.

Most importantly, we believe that the underlying premises for the cost benefit analyses are also insufficient and incomplete. We would feel more confident with a more in-depth analysis of the true economic impacts. And overall, more focus on the possible solutions.

We look forward to continuing to work with you. We recognize and appreciate the solution-oriented mindset of your staff and board. Since we live in a global economy, we would like to see more time spent on finding ways to develop incentive programs that will yield faster and more far reaching results. Please let us know how we can become better partners towards our mutual goal of facilitating goods movement and cleaning the air.

Sincerely,

Fran Inman

MAJESTIC REALTY CO.

Fran Inman
Senior Vice President