

MULTI-COUNTY GOODS MOVEMENT ACTION PLAN VOLUME 1, APPENDIX C: COMPENDIUM OF PUBLIC COMMENTS AND PROJECT PARTNER RESPONSES

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March 17, 2008 marked the conclusion of the 30 day period for stakeholder comments on the draft Multi-County Goods Movement Action Plan (“MCGMAP” or “Action Plan”). To solicit input throughout the development of the MCGMAP, a series of multi-county stakeholder advisory group meetings were held from the outset of the project. In addition, two anecdotal opinion surveys were conducted, several briefings and presentations were made to key stakeholders and twelve multi-county public workshops were held.

In general, stakeholders view this Action Plan as a good initial step toward addressing multi-county goods movement issues and consider the multi-jurisdictional partnership to be the catalyst for establishing the Southern California Consensus Group and other collective efforts that have proven to be successful in addressing good movement challenges throughout the region. Throughout the development of the Action Plan, stakeholders stressed the importance of developing plans for localized studies that go beyond the macro-analysis that was done in the MCGMAP. In addition, stakeholders expressed that they would like the project partners to maintain an open dialogue with all stakeholders; explore the use of community friendly alternative technologies to transport goods; secure new goods movement fund sources; and expand outreach and dialogue to the goods movement industry to assure there will be a balanced approach to improving mobility, mitigating community and environmental impacts and preserving economic vitality throughout the region.

This Appendix C contains copies of letters that were written about the Action Plan for which broad topical responses have been provided. The written comments, as well as the feedback obtained during the multi-county public workshops, reflect a variety of issues, perspectives and concerns expressed by stakeholders that are in some instances beyond the scope of this study effort. The attached letters also contain comments about issues that were not addressed in the MCGMAP and suggestions for subsequent study efforts. The letters and comments received will further define local priorities and the next steps needed to develop projects and requisite mitigation measures throughout the multi-county study region.

Also included in this appendix are Tables 1 and 2. Table 1 contains the source of written comments about the draft Action Plan. Table 2 contains abbreviated comments received during the multi-county public workshops. Both tables are sorted by the following topical response categories for ease in matching comments to responses:

- 1- Planning Processes and Community Outreach,
- 2- Potential Goods Movement Improvements, Strategies and Projects
- 3- Impacts and Mitigation
- 4- Rail-Related
- 5- Alternative Technologies for Freight
- 6- Funding
- 7- Security
- 8- Environmental Justice
- 9- Next Steps

Attached herein are Tables 1 and 2, a summary of the comments followed by general topical responses and copies of the letters that were received.

COMMENT SUMMARY & TOPICAL RESPONSES

1- Comment Summary for Planning Processes and Community Outreach Topic: there were a number of inquiries about the MCGMAP, its relationship to other regional plans and local project programming documents/processes, the role and purview of the agencies that were involved in developing the plan, and the outreach and plan approval process.

RESPONSE: The Multi-County Goods Movement Action Plan (MCGMAP or Action Plan) provides an overview of the region's goods movement challenges, the partner agencies' collective vision, and principles, recommended actions, and strategies. It also contains lists of recommended preliminary regional and county specific goods movement infrastructure improvements that are in various planning stages and in some instances controversial. Participating County Transportation Commissions and other agencies will continue with the development of projects and strategies identified in the MCGMAP. There is no priority to the projects/strategies included on the lists contained in the Action Plan for funding or any other purpose. Inclusion on any list does not imply approval of any project/strategy until public participation has concluded and environmental and other clearances are obtained from regulatory agencies.

Discussions with regional stakeholders will continue in an effort to move forward with the actions proposed in the MCGMAP. More detailed technical analyses will be completed, as recommended by the MCGMAP, in order to identify and prioritize regional goods movement projects and environmental and community mitigation measures that stretch across county and jurisdictional boundaries. Further, the MCGMAP is not intended to supplant local planning efforts. Local agencies and jurisdictions are encouraged to use the MCGMAP as a roadmap for future planning efforts. The project partners will continue to act as regional planning entities and will work with local jurisdictions to ensure that the principles and actions of the MCGMAP are implemented at all levels.

The MCGMAP partners are the transportation and planning agencies that co-managed the development of the Action Plan. These agencies include Los Angeles County Metro (Metro), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC), San Bernardino Associated Governments (SANBAG), San Diego Association of Governments (SANDAG), Southern California Association of Governments (SCAG), Ventura County Transportation Commission (VCTC), and Caltrans Districts 7, 8, 11, and 12. The MCGMAP partners plan, fund, maintain, operate, construct and implement multi-modal transportation projects which include goods movement related projects. The project partners developed four core mandates and six implementation principles (described in the Action Plan) that build upon the principles set forth in the Statewide Goods Movement Action Plan and provided the framework for the MCGMAP.

Other organizations, such as the Ports of Los Angeles and Long Beach, have authority to plan and construct transportation and facility improvements within their respective jurisdictions, while the South Coast Air Quality Management District (SCAQMD) and other air districts develop and implement plans to improve air quality throughout the region. Also, regional, state, and federal agencies have varying regulatory authorities over the trucking and rail industries, but the MCGMAP partners have little ability to regulate the operations, business practices, or pollutant emissions of the private sector goods movement operators, and no authority to regulate shippers and ocean carriers. As a result, the MCGMAP partners have focused primarily on goods movement infrastructure including environmental mitigation while acknowledging the essential roles and responsibilities of others.

Stakeholder participation and outreach was an essential component in the development of the MCGMAP. Two survey instruments were utilized and a project website (<http://www.metro.net/mcgmap>) was established to inform and engage stakeholders. Meetings and workshops were convened to gather input and share findings. Representatives from community advocacy and health organizations, air quality regulatory agencies, the ports, the trucking and railroad industries and other transportation agencies at all levels of government were invited to participate in the Stakeholder Advisory Group (SAG) meetings. Additionally, smaller one-on-one meetings were held with many of these groups to confirm data and obtain individual perspectives on issues related to goods movement. SAG meetings and county workshops provided a forum for stakeholders to comment on the content of the Action Plan and to express concerns about the impact on local communities, air quality, the environment and the transportation system.

The MCGMAP is a living document that will be revised and updated when major changes occur and if resources are made available. Adoption of this Action Plan by the project partners indicates regional consensus on a program of improvements and mitigation strategies that are needed to effectively address goods movement. As the goods movement system in the region continues to develop more outreach and coordination must occur among the project partners and stakeholders, including reaching out to new stakeholder groups not initially included in the MCGMAP effort.

2- Comment Summary for Potential Goods Movement improvements, Strategies and Projects Topic: Stakeholders were particularly interested in the level of detailed analysis that was performed, the range of alternatives and options that were studied and the existing capacity of the infrastructure. There were also a number of comments about factors and issues that were not addressed in the MCGMAP (e.g. air quality analysis, clustering of warehouses and other logistics practices, reverse flows, inland ports, east-west freight corridor definition, and the plan's evaluation criteria). Additionally, some stakeholder inquired about specific projects contained (and not contained) in the MCGMAP and specific route improvements.

RESPONSE: Given the broad scope and large study area of the MCGMAP, analyses of potential strategies and investments were done at a regional level rather than a local or project-specific level. While detailed project-level analyses were not a part of this effort, they are nevertheless critical and will be conducted as part of subsequent project development efforts. Through the stakeholder outreach process additional items were identified as needing further study (e.g., secondary and tertiary truck movements, reverse flow or empty containers, clustering of warehouses and the feasibility of inland ports remote from residences and sensitive land uses). These items will be analyzed in subsequent study efforts as referenced in the Next Steps section of the Action Plan. Further, SCAG will be conducting the comprehensive Regional Goods Movement Plan and Implementation Strategy that will include environmental mitigation and analysis of alternative technologies for transporting freight, reverse flows and a needs assessment of warehousing to augment the MCGMAP effort. The SCAG study will also serve as a precursor to a Regionally Significant Transportation Improvement Study (RSTIS) that will evaluate the feasibility of implementing a dedicated east-west freight guideway system and/or regional truck lanes on and off current freeway alignments. The RSTIS project area will extend the I-710 South study to an inland destination, possibly in the High Desert Area. The Action Plan notes that many projects and strategies described are at different stages of development; therefore,

substantial additional evaluation and analyses must occur as a part of required environmental clearance procedures, as well as to fully address the concerns of the region's stakeholders.

In terms of capacity of the existing infrastructure, all indications point to a future demand in international freight flows that will exceed even the most aggressive efforts by the ports, railroads, and transportation agencies to accommodate it. As referenced in the Action Plan, container volumes through the San Pedro Bay ports are projected to nearly triple from 15.7 million TEUs (twenty-foot equivalent units) in 2006 to 42.5 million TEUs by 2030. These forecasts are constrained by anticipated port capacity at a level significantly below the TEU demand projected for the ports in federally sponsored analyses. The study area's ports, airports, rail lines and intermodal terminals have existing capacity constraints that undermine the efficiency and productivity of the system as a whole. Furthermore, the existing roadway and rail networks are at or reaching capacity. As a result, the system today is susceptible to disruptions to the movement of goods, causing delays that reduce the quality of services and increase costs to consumers, not to mention substantial delays and congestion for all highway users. This mobility challenge is further exacerbated by the fact that the roadways, and rail networks that accommodate the movement of goods are often the same as those utilized by motorists and passengers for the movement of people.

Regarding the evaluation criteria, a qualitative evaluation of goods movement projects/strategies was conducted for the Action Plan. This analysis grouped a comprehensive list of 249 projects/strategies (the complete list is included in Appendix B of the Action Plan) into 15 categories of projects ranging from increased highway and rail capacity to changes in operational and institutional practices. The 15 categories of projects were then qualitatively evaluated using 26 evaluation criteria.

In the qualitative analysis of the categories of projects/strategies, the evaluation examined each category independently. The purpose of this independent evaluation was to show that each category of project/strategy performed differently across a variety of evaluation criteria. Many stakeholders indicated, and the MCGMAP recognized, that many projects/strategies within various categories may complement or contradict each other; therefore, combinations of projects/strategies and or categories would better serve the region. In order to evaluate the complex relationships of combined projects/strategies or categories, more detailed analysis was required.

This detailed analysis examined the relationship of various projects/strategies or categories when implemented together, as a bundle of projects. Five of the 15 categories (construction of additional freeway lanes/capacity, freeway operational/safety improvements, shuttle trains / alternative technologies including additional intermodal terminals, construction of dedicated truck lanes, and the use of Long Combination Vehicles on dedicated facilities) were modeled using the SCAG Travel Demand Forecasting Model and other more detailed analytical tools. This analysis modeled 12 bundles of projects/strategies and estimated potential cost which was kept constant at a cost per mile basis, quantified truck volumes, the number of hours of delay reduced for both autos and trucks, the number of warehouse acres in proximity to each corridor, the number of schools within 1/3 mile of the bundle, and the number of residential acres within 1/2 mile of the bundle.

However, due to the limitations of the analytical tools available, all bundles were modeled using a container forecast volume of 42.5 million TEUs by 2030. All analyses were completed from a regional perspective. Analyses were completed with the understanding that further detailed corridor-specific analyses would be required. It is recommended that the future detailed analysis should quantify factors

not included as part of this effort, such as design, right-of-way considerations including number of displaced properties, impact on commercial properties adjacent to corridors, right of way, cost, etc. The macro level analysis of dedicated truck lane systems, advanced technology and other bundles rendered preliminary information that warrants further investigation and outreach to affected communities to be conclusive. For more information about this analysis, refer to Chapter 6 of the Action Plan.

To support the actions, vision and market segmentation approach, the partner agencies identified two project lists: regional and county specific. The projects identified vary in terms of stage of development and implementation timeline; some can be implemented in the short-term while others require additional planning and project development. The projects on both lists are considered essential; neither list is viewed as taking precedence over the other but rather as complementary efforts to address the effects of goods movement in the region. The list of "Preliminary Regional Goods Movement Projects/Strategies" focuses on region-wide projects that provide environmental mitigation or ground access (rail, highway, and intermodal) improvements to and from the international gateways and the multi-county goods movement distribution centers and corridors (existing and proposed) within the Southern California region. The list of "Preliminary County-Specific Goods Movement System Projects/Strategies" includes improvements that are located within a single county and connect to the regional and statewide goods movement system of corridors and distribution centers and fill in gaps in the goods movement network. In addition, each of the Action Plan County chapters contain additional projects and strategies of a more localized nature. Queries about project selection, additional projects and specific route improvements should be directed to the appropriate transportation planning agencies.

3- Comment Summary for Impacts and Mitigation Topic: There were a number of questions and concerns about the goods movement impacts that were analyzed (e.g. community, air quality, economic, health and other local impacts) in the MCGMAP. There was also a question about the number of jobs that have been created as a result of the goods movement industry. In terms of mitigation, there were a number of questions from stakeholders that were interested in air quality and emissions control measures including comments on how to accelerate implementation of those measures that were noted.

RESPONSE: The region is faced with multiple mobility, environmental, community impact, funding, and economic challenges. While the scope of work for the Action Plan was limited to identifying the economic impacts of goods movement in terms of the logistics industry, and best existing practices to mitigate goods movement impacts, the project partners established a multi-county environmental working group to obtain more guidance from professionals that work in the environmental planning field. It was determined that this group will be an excellent resource for the project partners when the follow-up work pertaining to environmental and community mitigation begins. Further, the Action Plan identified two types of mitigation measures that must occur: Project-specific and Regional Mitigation Measures. The Action Plan suggests examples of project specific mitigation measures include use of the best available technology and best practices during construction; compliance with natural resource statutes and adopting "smart" design and good planning principles (e.g. landscaped buffering, noise barriers, exterior light shielding and positioning, separating incompatible land uses, and wetlands protection). The Action Plan recommends regional mitigation measures that can include accelerating funding and implementation of air quality plans, strengthening fuel and engine standards and adopting

institutional policies that support environmental and community benefits (e.g. designate quiet zones for rail corridors, amend zoning to avoid incompatible land uses and establish mitigation banking and/or a pool funds to alleviate impacts). Regional mitigations by their nature, will require continued coordination among goods movement stakeholders to ensure success. The MCGMAP also recommends a coordinated effort among the public and private sector to simultaneously and continuously improve the movement of goods and the associated environmental and community impacts. This is especially important given the CARB 2005 statistic that cites approximately \$20 Billion expended in healthcare costs related to health effects from PM and Ozone pollution from freight transport.

In addition, the Action Plan supports the air quality plans prepared by the Ports, the California Air Resources Board (CARB), and the South Coast Air Quality Management District (AQMD). However, as stated in the Action Plan Executive Summary, the MCGMAP partners cannot fully implement many of the plan's recommended strategies on their own. Therefore, to fully realize the benefits of this plan, continued collaboration and consensus building among the MCGMAP partners and other public and private sector stakeholders will be critical. To that end, one of the next steps in MCGMAP is to initiate an activity, in conjunction with the ports, CARB, and AQMD, to generate public and/or private funds to accelerate implementation of air quality improvement strategies being undertaken by these and other entities. Many of the air quality improvement plans are in place, but substantial funding is needed to enable and incentivize the acceleration of the emissions cleanup. It is expected that some of these implementation-oriented discussions will occur through the Southern California National Freight Gateway (SCNFG) Cooperation Agreement. The SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy will also provide some additional support in this direction. Furthermore, aircraft emissions are also a contributing source of emissions and will be addressed as part of ongoing emission reduction efforts.

The Action Plan does not specifically propose modifications to the dates in the current SIP (State Implementation Plan), Ports of Los Angeles and Long Beach Clean Air Action Plan (CAAP), or Air Quality Management Plan (AQMP). However, it is supportive of other actions that can be taken to accelerate the emissions cleanup, such as relocating the cleanest available train engines and truck fleets to Southern California facilities where that opportunity exists, generating additional funds for enabling and incentivizing the location of newer goods movement technology in Southern California, and using the leasing oversight of the ports to incentivize reduced emissions from marine vessels.

Reference was made in the prior responses to possible mechanisms for accelerating air quality initiatives, including expediting vehicle retrofit or replacement. In addition, the Environmental Justice Analysis and Outreach for the MCGMAP has been initiated, one products will be a guidebook of strategies that local governments and other agencies may use to avoid, minimize, and/or mitigate the impacts of goods movement. (Refer to #8, for more information.)

The MCGMAP partner agencies expect to be involved in discussions, through the SCNFG and other means on actions that can be taken to expedite the implementation of various emission reduction strategies. Concepts for accelerating emission reduction strategies will need to be brought forward and discussed with the public and private sector entities that are in a position to take action and implement the needed changes.

As stated in the Action Plan, implementation of the recommended goods movement projects rests with the individual entities, both public and private, that have funding and implementation responsibility. Most of these projects are multiple years from being implemented, and project-level environmental reviews will be conducted at the appropriate time. The Action Plan views the recommended infrastructure projects to be needed to keep up with the growing freight demand, but also recognizes that each project will need to move forward in a way that avoids, minimizes, and/or mitigates environmental impacts.

In terms of employment and other economic gains, it was found that despite its impacts, international trade provides significant benefits to the region. The logistics industry provides both direct and indirect benefits to the region's economy. Economic studies show that logistics activity is responsible for \$90.7 billion, or 6.6%, of the nearly \$1.4 trillion in economic activity annually in Southern California. The indirect or induced impact represents another \$170 billion or 12.4%. Each logistics job supports 2.2 new jobs in the economy. This contribution to the economy is significant and is important to achieving the MCGMAP vision and maintaining the economic vitality of the region.

4-Comment Summary for Rail-Related Topic: There were a number of stakeholders interested in the railroads, railroad operations and rail capacity improvements (e.g. intermodal facilities, on dock and near dock facilities). In addition, some stakeholders inquired about specific grade separation projects and passenger rail services, train idling and electrification that was noted.

RESPONSE: The railroads have been an active participant in the SAG meetings. The MCGMAP recognizes the importance of freight rail to the region's goods movement system. Therefore, the Action Plan calls for increased intermodal and on-dock and mainline rail capacity in order to maximize the share of goods moving by rail. However, while there is a need for additional rail intermodal capacity, any such facility must undergo required environmental impact analyses before implementation. It is important to note that rail projects must demonstrate public benefits in order to qualify for public funding. Also, given the importance of rail for goods movement, it is important to continue dialogue and cooperation between the public and private railroad companies in order to implement the most efficient, cost-effective, and environmentally friendly solution possible.

Also, the MCGMAP does not endorse any specific advanced technology, but recommends additional evaluation of technology options. The MCGMAP partners recognize that any specific operational solution or technology option dealing with line-haul freight is highly complex, will be driven by the operational needs of the logistics industry, must involve cost-effective solutions, and must represent a feasible transition from current technologies. At the same time, the MCGMAP partners recognize the need to make major advances in freight-hauling capacity while at the same time improving the environment. Both the public and private sectors must be involved in exploring these options. In conjunction with rail capacity improvements, the MCGMAP also recommends strategies and projects to reduce the community and environmental impacts of goods movement. For example, the Action Plan recommends construction of grade separation projects as well as expediting fuel and engine standards. Queries about specific grade separation projects should be directed to the appropriate transportation planning agencies.

The MCGMAP seeks to build upon successful rail projects already undertaken in the region, including the Alameda Corridor and the Alameda Corridor East. Through similar coordinated efforts, the project partners believe that the goals of the MCGMAP can be achieved.

5- Comment Summary for Alternative Technologies for Freight Topic: There were a number of comments from stakeholders requesting more analysis of alternative technologies. In addition, there was interest in maglev systems and zero emission technology.

RESPONSE: Assessment of specific types of technology was not within the scope of MCGMAP. Efforts underway by the Ports of Los Angeles and Long Beach, SCAG, as well as the I-710 Environmental Impact Report/Environmental Impact Statement will focus on analysis of alternative technologies and alignments based upon further evaluation. However, as part of MCGMAP analyses, an alternative technology bundle was modeled to reflect impacts as a result of reduction in truck trips due to the utilization of an alternative technology. The MCGMAP analyzed the potential benefits of an unspecified alternative technology system extending from the Ports of Los Angeles and Long Beach to an inland port generally located at the intersection of the I-10 and I-15 freeways. An operational target of 1.35 million annual container lifts was used, which translates into 5,400 trucks per day. This is approximately the volume handled by the BNSF Hobart Yard in Commerce, which is currently the largest such facility in the study area. An estimate of 5,400 trucks per day appears reasonable, given that the Southern California Association of Governments' "Inland Port Feasibility Study" Task 1 and 2 report estimates that in 2010, 4,500 truck trips per day will occur between San Bernardino and Riverside Counties and the Ports of Los Angeles and Long Beach. However, it is possible to increase the volume handled by an inland port and associated alternative technology system if distribution centers are clustered around the inland port and the port can attract other market segments. As a result, the MCGMAP recommends further analysis of the inland port strategy and evaluation of the feasibility of implementing a dedicated freight guideway system and /or regional truck lanes in the study area. This analysis would include a comparative evaluation of the air quality impacts and related benefits for each alternative, as well as the identification of market conditions required to develop an inland port facility. Market conditions will ultimately drive the decisions for location, system connectivity, and lift capacity of an inland port.

6-Comment Summary for Funding Topic: Stakeholders were particularly interested in the region getting its fair share of funding for goods movement infrastructure improvements and mitigation measures. A number of stakeholders inquired about user fees, collection of user fees, incentives and disincentives, and the potential for seeking other funding sources including the private sector.

RESPONSE: The goods movement system is significantly underfunded. Projects and programs identified in this Action Plan show funding needs on the order of \$50 billion over the next 25 years. This will require funding commitments from all levels of government as well as the private sector.

Despite accommodating most of the nation's international trade volumes, Southern California has received a disproportionately low share of federal and state funding for goods movement. Moreover, the private sector's role in funding regional and nationally significant goods movement projects to date has been limited. It is imperative that new avenues of goods movement funding for projects be pursued, including other state appropriations, federal funds, and private sector contributions consistent

with the impacts of the benefits they derive from the use of the transportation system. For example, next year the Congress is expected to act on national transportation reauthorization legislation. While it is unclear at this point what direction that legislation will take regarding meeting the nation's goods movement needs, organizations such as the Coalition for America's Gateways and Trade Corridors and the American Road Transportation Builders' Association have developed recommendations regarding goods movement issues that could be considered by the Congress. Among those recommendations are:

- A separate title dedicated to goods movement policy issues including potential funding sources
- Potential freight-related funding sources to be considered are:
 - a fee on containers entering our ports
 - an increase in federal customs fees
 - a mileage tax on truck travel
 - a ton-based freight fee on all modes (truck and rail)

On the state level, with the passage of Proposition 1B, a \$19.9 billion transportation bond issue, in November 2006, \$2 billion was made available for goods movement projects. (Some of the projects submitted for funding appear in the Action Plan). Working with the California Transportation Commission (CTC), the Southern California Trade Corridors Improvement Fund (TCIF) Working Group, a partnership of public sector goods movement stakeholders garnered \$1.64 billion out of a total of \$3 billion made available by the CTC for TCIF. Furthermore, the San Diego Border Region received \$400 million of this amount for goods movement projects (For more information on TCIF, please refer to Appendix D.)

User Fees are an approach for obtaining additional funding from specific users of designated facilities or systems. In some cases user fees can be synonymous with tolls or congestion charges, while others may view user fees as the cost associated with transporting goods using a specific or preferred mode of transport. The underlying premise is that specific users pay for the privilege of using a system or facility which provides some benefits in terms of increased speeds or reduced congestion. Ongoing efforts by the private sector, Ports, state, the federal government, and other stakeholders to obtain fair-share contributions and user fees must be coordinated and developed to work in concert together. Any discussions of fair-share contributions or user fees must ensure that economic, environmental, and operational impacts are addressed in an equitable and balanced manner. If agreed upon there would be a need to establish structures to manage user fees and revenue that are acceptable to both public and private sector stakeholders.

Also on the state level, the Legislature is considering container fee legislation to be implemented in 2009, which would impose a \$30 fee on each shipping container processed at the Ports of Long Beach, Los Angeles and Oakland. The fee would fund congestion management and air quality projects related to the ports. It is estimated that for the Ports of Los Angeles and Long Beach, \$100 million would be generated in 2008-09 and \$340 million annually thereafter. The legislation would also permit the ports to bond up to \$5 billion of the proceeds from the container fee.

The MCGMAP proposes a strategic approach for involving public and private sector groups. The MCGMAP also recommends methods for public and private sector entities at various levels, from initial planning to project operations. The participation of the private sector, particularly our nation's railroads, in the development of solutions to our region's goods movement problems is essential. Forging a

partnership with private corporations who own the rail rights-of-way will be put to the test with the implementation of Proposition 1 B grade separation projects. A major topic to be discussed at that time will be the sharing of the cost of those projects based on which party benefits and which party is the most impacted.

7- Comment Summary for Security Topic: There was one inquiry about homeland security and whether the new security measures have resulted in more traffic delays at the ports.

RESPONSE: MCGMAP Tech Memo 3 and Chapter 3 in the Action Plan reference the importance and significance of goods movement security, as well as programs that have been initiated to enhance the safety and security of goods movement. The MCGMAP partners do not have any direct authority over goods movement security. Instead, security is handled by a collection of federal, state, and local agencies, such as the U.S. Department of Homeland Security/Customs and Border Protection, U.S. Coast Guard, and other local, state, and federal law enforcement agencies. As a result, the MCGMAP emphasizes the importance of goods movement security but recognizes that security is beyond the scope of this plan as well as the partner agencies' roles and responsibilities. There are, however, significant losses of output and jobs as a result of increased delays at seaports, landports, and airports. These delays could be attributed in part to changing security measures, causing an impact on local, regional, and national productivity.

8- Comment Summary for Environmental Justice Topic: There was one inquiry about the multi-county environmental justice study.

RESPONSE: The MCGMAP partners recognize the local and community impacts of goods movement. As a result, the project partners have embarked upon the Goods Movement Environmental Justice Analysis and Community Outreach project. The goal of the project is to expand the region's understanding of goods movement impacts, and identify best practices and/or solutions that support community based approaches to address the disproportional impacts of goods movement that are largely borne by minority and low income communities. The project will result in a guidebook that documents the strategies for minimizing the impacts of goods movement. In addition, the guidebook will contain one case study in each county (Los Angeles, Riverside, San Bernardino and Ventura) that will examine impacts and potential mitigation strategies. This project is expected to be completed in late 2008/early 2009. Depending on the outcome of this project, it is possible that the MCGMAP partners could embark on subsequent phases of this work.

9- Comment Summary for Next Steps Topic: There were a number of stakeholders that offered comments and suggestions about the next planning steps. In addition, there were views expressed about landuse conflicts, port diversion and private sector planning horizons versus public transportation planning horizons that were noted.

RESPONSE: The project partners are particularly mindful of the various roles that the ports, railroads, regulatory agencies, business community and the logistic industry play in the goods movement system. It is with the utmost respect that the project partners, acting on behalf of the communities that are

impacted by the decisions that are made by this industry, develop short and long term transportation plans to improve mobility so that Southern California residents can continue to enjoy a superior quality of life. While it is not the intention of the partner agencies to engage in strategic planning for the goods movement industry, collective efforts such as this provide a better understanding of a very complex system and allow planners to make more informed decisions.

Further, the success of the partnership between public and private sector interests that has developed through this study rests with all of the participants. It is for that reason that all stakeholders will play an integral role in the next steps in terms of promoting partnership and advocacy, reducing environmental and community impacts, improving mobility and securing funding as described in the Action Plan. Also ongoing support to groups such as Mobility 21 and the Coalition for America's Gateways and Trade Corridors and others in their efforts to develop dedicated federal and state goods movement funding sources will be crucial.

COPIES OF CORRESPONDENCE

TABLE 1: WRITTEN COMMENTS ON ACTION PLAN SORTED BY TOPICAL RESPONSE CATEGORIES

1. PLANNING PROCESSES AND COMMUNITY OUTREACH		
Topic	Perspectives & Concerns	Source – Correspondence
<p>MCGMAP Plan Approval and Integration into Other Plans</p>	<ul style="list-style-type: none"> ▪ "It appears that our comments to the SANDAG Freight Working Group and actions of the SANDAG Board of Directors in adoption of the 2030 Regional Transportation Plan update in November 2007 have NOT been incorporated into the MCGMAP." ▪ "...the MCGMAP Draft Executive Summary 2007's Implementation Principles...appear to run counter to representations that the San Diego SANDAG 2030 RTP takes precedence in transportation planning and funding. If the MCGMAP is to be used as noted, it would appear that it requires proper environmental review. By not expressly noting this at all points in the MCGMAP this document is inaccurate and misleads other jurisdictions and agencies in their planning and budgeting." ▪ "[The MCGMAP does not reflect the 2007 San Diego adopted 2030 RTP showing the deletion of the GMAP designation for the area between the I-15 – I-805 intersection and the I-15 – SR-163 intersection.]" 	<p>City Heights Community Development Corporation</p>
	<ul style="list-style-type: none"> ▪ "Approval of the Plan should not include approval of specific projects that have not undergone all environmental reviews." 	<p>South Coast Air Quality Management District</p>
<p>Implementation Principles</p>	<ul style="list-style-type: none"> ▪ "...impacts from any proposed facility (such as impacts to sales tax base from any freeway widenings) should also be an implementation principle." ▪ "Another implementation principle should also the active input and participation from the private sector and include an environmental principle stating that all projects or strategies be environmentally protective or mitigate existing environmental deficiencies be considered for as the number one Implementation Principle." 	<p>Gateway Cities Council of Governments</p>

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS		
<p>Alternatives and Factors Analyzed and/or Considered</p>	<ul style="list-style-type: none"> ▪ Does the MCGMAP discussion of a dedicated freight guideway facility] “refer to I-15 all the way South into San Diego?” ▪ “In general some of the conclusions [shown on the summary of qualitative evaluations] with respect to the “most” benefit overlook the inter-dependency of the goods movement industry and the benefits of other aspects of goods movement – most notably the use of alternative technologies, improved railroad systems improvements, port hours of operations, efficiencies and ITS.” ▪ “[The] section [that] recommends truck lanes on I-710 and SR-60 freeways and is not acceptable to GCCOG.” ▪ [The discussion of mainline rail capacity increase] “...should have also mentioned other railroad systems that are needed to be able to use additional railroad mainline capacity.” ▪ “This [situation with the potential short-fall in Intermodal lift capacity which could be as much as 10.25 million TEUs annually] is significant and the plan should discuss or evaluate the situation of mode transfer to trucks if these railroad systems capacity constraints are not addressed.” ▪ “[The] discussion about the situation with truck lanes acceptability but should have referenced the guiding principles with respect to this issue from the SR-91/I-605/I-405 Corridor Cities Committee.” ▪ [Major items need to be adequately addressed, such as detailed technical analyses of truck lane feasibility, more input from the logistics sector, the capacity of freight movement corridors, detailed community impacts, safety for truck and rail, institutional building, other goods movement factors, improved data, inter-dependence of various logistics movements, goods movement emissions reductions, quantitative cost/benefit analyses of freight guideway facilities, alternative technologies, port growth, and environmental and community impact mitigation measures.] ▪ “Secondary/tertiary truck trips [should be] developed [and] evaluated as well as ultimate destination analyses.” ▪ “Logistics sector changes [should be evaluated].” 	<p>City Heights Community Development Corporation</p> <p>Gateway Cities Council of Governments</p>

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS - CONTINUED	
<p>Alternatives and Factors Analyzed and/or Considered</p>	<p>South Coast Air Quality Management District</p> <ul style="list-style-type: none"> ▪ "...we urge that any proposed infrastructure proposals include comparative analysis of implementation feasibility [e.g., available right-of-way or adaptability to zero or near zero emissions technologies]." ▪ "...we urge that the Action Plan also present an analysis of the air quality impacts and benefits of major alternative goods movement proposals, such as truck lanes and 'Alternative Technology' rail alternatives, or a combination of the two." ▪ "Despite the promise of this multi-county planning effort, we are concerned that an insufficient range of potential transportation systems has been analyzed to enable policy makers to design an optimal freight transportation system. In addition, the alternatives that were analyzed were not analyzed for air quality impacts, limiting key information available to policymakers. The Action Plan also needs to more fully describe mechanisms to achieve air quality goals, and must ensure that full project level review occurs before specific projects are assumed to be appropriate." ▪ "It should also be noted in the MCGMAP that according to page 6-30 in the same adopted SANDAG 2030 RTP 'Dedication or construction of additional lanes for HOV or other uses in the SR 15 Mid-City segment of I-15 is contingent on the completion and operation of BRT stations and system improvements pursuant to agreements between the State and City of San Diego.'"
	<p>City Heights Community Development Corporation</p>
	<p>Gateway Cities Council of Governments</p>
	<p>[Reverse Flow – Empty Containers]</p> <ul style="list-style-type: none"> ▪ "The plan does not address the impacts of reverse flow of goods (empty containers and exports)." ▪ "In the future, data should be developed for daily volumes for 40' containers as that is the most useful for planning purposes. Also, the time of day these containers are moved (or relocated) should have been analyzed."
<p>Action Sets</p>	<p>[More detail should have been developed for the four action sets.]</p>
<p>Logistics Industry Practices</p>	<p>"Rethinking existing warehousing and defining new paradigms for storage and transloading should be discussed with the logistics users."</p>
	<p>Gateway Cities Council of Governments</p>
	<p>Gateway Cities Council of Governments</p>

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS - CONTINUED	
Project information	<ul style="list-style-type: none"> ▪ "The 2030 San Diego RTP clearly states that 'I-15 between I-805 and SR 163 was removed from the GMAP network in November 2007.'"
3. IMPACTS AND MITIGATION	
Community, Environmental, Health and Other Local Impacts	<ul style="list-style-type: none"> ▪ "The MCGMAP does not appear to consider the problems of communities that are dissected by freeways that are designed for Goods Movement." ▪ "Clearly prioritize health of sensitive receptors, e.g. 'Health over Freight'" ▪ "Redirect – Reroute trucks and other mobile freight pollutants when schools are within 500 feet to the more restrictive 1/3 mile from a dedicated Freight Guideway or other designated GMAP." ▪ "A clearer strategy should be implemented to address [the problem of people closer to the pollution sources suffering greater health issues due to higher levels of pollution]"
	<ul style="list-style-type: none"> ▪ "In order to this plan to garner the public support needed to succeed, it must demonstrably improve current unacceptable environmental conditions, both regionally and in locations affected by specific goods movement facilities." ▪ "...aircraft emissions are described as not being a significant source of pollutants compared to other mobile sources. We disagree. Aircraft will soon be in the top ten NOx categories."

3. IMPACTS AND MITIGATION - CONTINUED		
Accelerating Control Measures	<ul style="list-style-type: none"> ▪ “The current SIP, CAAP, and AQMP Plans already contain unrealistic assumptions regarding the availability of new locomotive technology. The Draft Plan should not propose that the dates in the current SIP, CAAP, or AQMP be accelerated in advance of the dates promulgated by US EPA.” 	The California Railroad Industry
Control Measures	<ul style="list-style-type: none"> ▪ [The action plan must address key emission control issues such as] “how to ensure implementation of advanced control technologies for [emission] sources...how to expedite retrofit or replacement of heavy-duty trucks, locomotives and marine vessels...[and] how to ensure that the goods movement facilities are designed and sited so as to avoid unacceptable local and cumulative impacts.” ▪ “Such mechanisms [to implement the Action Plan’s environmental goals] should seek to implement any control measures that have not been adopted as regulations or other enforceable instruments by international, federal or state agencies, ports or other governments.” 	South Coast Air Quality Management District
4. RAIL-RELATED		
Electrification	<ul style="list-style-type: none"> ▪ “All previous studies of electrification in southern California raise insurmountable operational and cost-effectiveness issues that must be thoroughly considered in any public policy discussion. Electrification is cost prohibitive and would result in limited reduction of emissions.” 	The California Railroad Industry
Grade Separations	<ul style="list-style-type: none"> ▪ “Construction of the Colton Crossing grade separation will provide significant public benefits.” ▪ “Standard grade separation projects do not enhance velocity, throughput or capacity for railroad operations. Instead, such projects provide a distinctly public benefit by moving vehicles resulting from nearby development over or under rail lines. The National Highway Trust Fund, other federal sources, and contributions by the state and local sector are possible sources for funding these proposed improvements.” 	The California Railroad Industry
Intermodal Facilities	<ul style="list-style-type: none"> ▪ “Without the development and modernization of [the ICTF and SCIG] facilities, more containers will move by truck rather than by train. The development of the SCIG and the modernization of the ICTF are necessary to ensure that intermodal lift capacity is increased to minimize modal shift and maximize the use of rail transportation with its inherent environmental benefits.” ▪ “Major Transportation Facilities – This section does not mention (and should have) the ICTF and other Intermodal yards in Commerce and Vernon.” 	The California Railroad Industry Gateway Cities Council of Governments

4. RAIL-RELATED – CONTINUED		
Metrolink	<ul style="list-style-type: none"> ▪ “Any Metrolink expansion, if even possible on freight corridors, will have to be negotiated in the future by the interested parties.” 	The California Railroad Industry
On, Near Dock Rail Facilities	<ul style="list-style-type: none"> ▪ “The Railroads also support the conclusions from the Ports Rail Master Plan that even with full development of all on-dock rail facilities, additional near dock facilities will be needed in order to prevent more containers from moving by truck rather than rail.” ▪ “Additional near-dock rail facilities should not be assumed in the MCGMAP as there is significant local opposition to these additional facilities.” 	The California Railroad Industry Gateway Cities Council of Governments
Railroads	<ul style="list-style-type: none"> ▪ “Railroad system constraints (and resulting impacts)...need to be vetted with the railroads as a reality check.” 	Gateway Cities Council of Governments
Train Idling	<ul style="list-style-type: none"> ▪ “The Railroads, however, do not support local rules or regulations that restrict idle duration and such local rules and regulations are clearly preempted by Federal and State law.” 	The California Railroad Industry
5. ALTERNATIVE TECHNOLOGIES FOR FREIGHT		
Alternative Technology	<ul style="list-style-type: none"> ▪ “In general shuttle trains should not have been listed with alternative technology.” ▪ “While the Railroads are supportive of the development of new technology [such as maglev and linear induction motors], it seems unlikely that fixed guide-way system applications (such as maglev) will be feasible given costs, operating issues, and impacts on rail yard operations.” <p>[Bundle Analysis]</p> <ul style="list-style-type: none"> ▪ [The evaluation of alternative technology options should be greatly expanded to address issues such as increasing the capacity of an inland port, clustering new warehouse construction around an inland port, using the inland port as an “agile port,” the proximity of the alternative technology corridor to sensitive receptors, considerations of emissions and potential emission reductions related to increased emission control or electrification, maximizing on-dock rail and minimizing rail operations near residential areas, and the elimination or drayage of containers by truck from the ports to railyards, or the electrification of all means of container transport.] ▪ [In regards to the assumptions for the alternative technology bundle and the assumption of an inland port with a capacity of 5,400 lifts per day] “One reason for [the assumption of 5,400 lifts per day capacity] is that the Action Plan envisions this inland port as being limited to containers destined for locations within the region; those destined outside of this region would not utilize the facility.” 	Gateway Cities Council of Governments The California Railroad Industry South Coast Air Quality Management District

A31418 Multi-County Goods Movement Action Plan
 Appendix C: Compendium of Written Comments and Project Partner Responses
 Table 1: Written Comments on Action Plan
 April 28, 2008

9. NEXT STEPS - CONTINUED		
	<ul style="list-style-type: none"> ▪ "...should any jurisdictions pursue such guidelines [for the siting and designing goods movement related land uses and transportation facilities], we strongly encourage that this be undertaken as a joint effort between the local jurisdictions and practitioner groups, such as NAIOP and the Building Industry Association, to be most effective." ▪ "We do not believe that diversion to other ports is necessary, but rather that more efficient ways, both logistically and environmentally, should be found to move the goods." 	NAIOP
	<ul style="list-style-type: none"> ▪ "Future logistics facilities will be greatly influenced by local land use decisions, which may not reflect regional goods movement needs and priorities. These barriers need to be anticipated and addressed" 	Watson Land Company
	<ul style="list-style-type: none"> ▪ Regarding the Goods Movement Strategic Plan for Los Angeles County ▪ "The GCCOG is recommending that a community-based plan working with the most affected communities is a necessity and a first step. This effort needs to include input from all public sector and private sector stakeholders." ▪ [There is no explanation of why the proposed next steps will work.] ▪ "A more specific 'next steps plan' is needed that includes community and perhaps equally important industry input." 	Gateway Cities Council of Governments

TABLE 2: WORKSHOP COMMENTS ON ACTION PLAN SORTED BY COUNTY & TOPICAL RESPONSE CATEGORIES

Los Angeles County Workshops – December 3, 6, 13, 2007 and February 20, 2008

1. PLANNING PROCESS AND COMMUNITY OUTREACH		
Topic	Questions, Perspectives and/or Concerns	Source of Comments
Agency Coordination	<ul style="list-style-type: none"> ▪ It would be beneficial to include Kern County and Central Valley in the study process. 	Marilyn Beardslee, Kern Council of Governments
MCGMAP Plan Approval and Integration with Other Plans	<ul style="list-style-type: none"> ▪ What is the relationship with SCAG? 	Marilyn Beardslee
Outreach/Agency Coordination (Roles and Responsibilities)	<ul style="list-style-type: none"> ▪ Has AQMD been involved? 	Marilyn Beardslee
Agency Coordination (Roles and Responsibility)	<ul style="list-style-type: none"> ▪ Has SCAG's Regional Transportation Plan incorporated the efforts of the Multi-County Goods Movement Action Plan? 	General Comments
MCGMAP Plan Approval Process and Integration with Other Plans	<ul style="list-style-type: none"> ▪ What approval is being requested from the Boards in March – seems premature? ▪ Does the Action Plan focus on local projects or regional projects? How does it relate to the RTP? ▪ What effect does the Plan have? The use should be defined. 	LaDonna DiCamillo, BNSF Railway
Outreach	<ul style="list-style-type: none"> ▪ Gateway Cities has already adopted a mitigation plan for goods movement. Metro and other transportation agencies should work through area Councils of Governments to ensure strong local involvement in the above-mentioned grant program. <p>Outreach & Agency Coordination</p> <ul style="list-style-type: none"> ▪ What input have the ports and railroad had in the development of the plan process; and will there be one-on-one meetings held with these groups? 	General Comments Peter Greenwald, AQMD
		Sharon Neely, Alameda Corridor-East

1. PLANNING PROCESS AND COMMUNITY OUTREACH - CONTINUED	
Future planning	<ul style="list-style-type: none"> ▪ Elected officials shouldn't be making all of the decisions. Let the public decide what types of transportation modes they would support through their taxes. We should ask the public questions, such as, "Should we invest in Maglev? Should we consider an underground tunnel for goods movement?" These kinds of questions and the survey results should be included in the Action Plan.
2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS	
Alternatives and Factors Analyzed and/or Considered	<ul style="list-style-type: none"> ▪ Need to consider the agricultural business and warehouses in the Central Valley. ▪ A dedicated truck lane on Highway 58 eastbound would be a major elevation change, 350 to 4,000 feet. ▪ Consider the scenario of "What if Americans change their way of living through less consumption?" or if overseas industry/business bring manufacturing back to America. Americans may be forced into buying less because of increased prices. ▪ What would alternate be when Interstate 5 closes? Would Highway 58 be considered a safer route?
	Colleen Callahan, American Lung Association
	Marilyn Beardslee, Kern Council of Governments

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS - CONTINUED	
<p>Alternatives and Factors Analyzed and/or Considered</p>	<ul style="list-style-type: none"> ▪ How are secondary and tertiary truck trips quantified in the Action Plan? ▪ How do we account for shifts in freight volumes due to the economy or other factors? ▪ The Action Plan focuses on goods flowing from the Ports of LA/Long Beach to other locations. What about interregional movement between cities? What percentage of truck traffic do these interregional trips comprise? ▪ Several potential freight corridors are included in the Action Plan. Does the plan suggest whether these corridors are elevated, trenched or grade-separated? ▪ Has a detailed analysis been performed of the types of jobs that goods movement creates? ▪ Better land use and vertical building need analysis. ▪ A feasibility study for Interstate 710 is underway. These study results need to be considered as part of the Action Plan. ▪ What about moving cargo by air – such as by dirigibles? This would be an effective way to bypass congested highways and roads. ▪ Gateway Cities is working with the San Gabriel Valley COG to represent 61 cities in the region. This group is opposed to the I-710/Route 60/I-15 goods movement route that is included as an option in the Action Plan. There is no reason for that alignment to be selected as a truck route. Alternative technology also should be a bigger component of the Action Plan. The report should focus on function – non-polluting, community-friendly options. More specifics are needed to quantify air quality studies. In addition, cities along the Route 91/Interstate 405/Interstate 605 alignment are not supportive of these freeways being widened to accommodate the movement of freight. ▪ Support as much diesel out of goods movements as practical, i.e. through on-dock rail; electrify rail lines; grade separations through major arterial road crossings; cluster major distribution renters along rail lines (work with cities and counties – zoning). ▪ Describe east-west corridor as “area” to be studied “not route 60” e-w corridor. ▪ Is there a maximum number to limit imports to Ports of LA and Long Beach?
	<p>Colleen Callahan, American Lung Association</p>
	<p>Michael Milroy, The Planning Center/Sierra Club</p>
	<p>Harry Baldwin, SGVCOG Governing Board Gary Neely, Assemblyman Bob Huff’s Office</p>

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS - CONTINUED	
<p>Reverse Flow</p> <ul style="list-style-type: none"> ▪ Empty containers are a big problem. Stacked, rusting, empty containers create eyesores for the community and are "clutter." Empty containers should be spread around the nation, not left behind in our area. A complete inventory of containers is needed, included whether these containers are empty or full. ▪ Requested a percentage breakdown for inbound and outbound containers: Also commented that in terms of the empty containers, these should be restricted to traveling on non-peak traffic hours. <p>Warehouses</p> <ul style="list-style-type: none"> ▪ Does the Action Plan address clustering of warehouses, more efficient use of roadways, trucks vs trains, or intermodal lift constraints? 	<p>Colleen Callahan, American Lung Association</p> <hr/> <p>Gary Neely, Assemblyman Bob Huff's Office Colleen Callahan</p> <hr/> <p>Colleen Callahan</p> <hr/> <p>Sharon Neely, Alameda Corridor-East Peter Greenwald, AQMD</p>
<p>Logistics industry practices</p>	<p>What is the break-even point for shippers to send goods directly to the Midwest or east coast, rather than shipping them to the west coast and transporting them by truck or rail from here?</p>
<p>Project Information</p>	<p>Suggested the development of a Fact Sheet that is specifically for elected officials, which identifies how many dollars (\$) it would take for improvements.</p>
<p>Project List</p>	<p>What use will the project list provide?</p>
3. IMPACTS AND MITIGATION	
<p>Impacts (Community, Environmental, Health and Other local impacts)</p>	<ul style="list-style-type: none"> ▪ Public health costs are a significant impact from goods movement. These costs should be factored into the recommendations. ▪ A more detailed analysis of public health impacts should be evaluated for the Action Plan. Not enough detail is provided about this important issue. ▪ Train noise is more than a nuisance. It is a serious health issue that causes lack of sleep and other problems. This should be given more consideration in the Action Plan. ▪ This is out of the purview for the moment, but in the near future there needs to be an allocation of resources to utilize existing methodologies to enhance projects, transportation options and land uses for their public health benefits and risks. ▪ Get message (signals) to the rest of the country so that they understand the impacts of imports to our local Southern California community.
	<p>Colleen Callahan, American Lung Association</p> <hr/> <p>Michael Milroy, The Planning Center/Sierra Club</p>

3. IMPACTS AND MITIGATION – CONTINUED	
	<ul style="list-style-type: none"> - Concerned about impacts of truck replacement program, i.e. although rail will benefit the jobs for truck trips in moving freight will be reduced and/or eliminated. ▪ Seek changes to federal rules, i.e. ICC seeking to block part of the ports CAAP.
Mitigation	Pablo Ayala, Truck Driver Michael Milroy, The Planning Center/Sierra Club
4. RAIL-RELATED	
Grade Separations	<ul style="list-style-type: none"> ▪ [Need] more grade separations through the high desert corridor (from SR-14 to the I-15 where Highway 58 crosses to San Bernardino County.
Project list	Marilyn Beardslee, Kern Council of Governments Marilyn Beardslee
5. ALTERNATIVE TECHNOLOGIES FOR FREIGHT	
Alternative Technology	<ul style="list-style-type: none"> ▪ Are innovative projects like Maglev included in the plan for reducing vehicle emissions?
Railroads	<ul style="list-style-type: none"> ▪ Zero emission rail should be considered; this project completion schedule doesn't seem to allow sufficient time for a proposal to conduct zero emission rail.
6. FUNDING	
Funding	<ul style="list-style-type: none"> [Cost Distribution and Container Fees] <ul style="list-style-type: none"> ▪ How will project costs be distributed? Does the Action Plan recommend funding specifics, such as container fees?
7. SECURITY	
Security	<ul style="list-style-type: none"> ▪ Did the study address homeland security issues?
	Colleen Callahan

8. ENVIRONMENTAL JUSTICE	
Environmental Justice	<ul style="list-style-type: none"> ▪ What level of work is being done to promote environmental justice? ▪ Environmental justice organizations need to be invited to meetings that are being planned through the above-mentioned grant. The Los Angeles EJ Network and other groups should be invited.
9. NEXT STEPS	
Next Steps	<ul style="list-style-type: none"> ▪ What/Who will enforce the next steps?
David Liu, City of Diamond Bar, Public Works Department	

Orange County Workshops – January 14 and 17, 2008

1. PLANNING PROCESS AND COMMUNITY OUTREACH		
Topic	Questions, Perspectives and/or Concerns	Source of Comments
Agency Coordination	<ul style="list-style-type: none"> ▪ The new federal transportation act report was released two days ago. Can MCGMAP partner with this act? Agency Coordination & Alternatives and Factors Analyzed and/or Considered. ▪ Also, how about the High Speed Rail study and the Maglev study – are we coordinating with these studies? <p>Roles and Responsibilities</p> <ul style="list-style-type: none"> ▪ What is Orange County's role in goods movement? Orange County is not a major destination for the 40% of goods passing through Southern California. How much freight will be transported down I-5 and into Orange County? ▪ Is SCAG involved in this process? 	General Comments, OCTA Laguna Hills Public Workshop
MCGMAP Plan approval and integration into other plans	<ul style="list-style-type: none"> ▪ How does Mobility 21 fit in? ▪ What is the timeline and cost for implementing the types of improvements that are needed? 	General Comments

2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS		General Comments
Alternative technology	<ul style="list-style-type: none"> ▪ How can you compare a MAGLEV system to freight? 	General Comments
Alternatives and Factors Analyzed and/or Considered	<ul style="list-style-type: none"> ▪ Supervisor Pat Bates just had an accident on the freeway, due to a large truck. Trucks are not a safe, efficient way to transport goods. Need to take into account the opportunity costs and impact on safety and lives when preparing this plan. ▪ Need to separate trucks from cars on our roadways. Also need to separate passenger rail from freight. ▪ Have we researched the impact of the pipeline for LPG, and how air cargo affects the goods movement picture? ▪ Look at use of or conversion of carpool lanes to truck lanes (a) during non-peak hours (b) full conversion. ▪ Transportation and Mobility are not part of the top 5 challenges, why? I think they should definitely be included as the 6th challenge. ▪ How are you counting the aggregates and cars? Did you include the empty container return in the study? ▪ There are huge costs related to loss of time/efficiency by commuters and delays by freight operators. Has this cost been calculated? Do we have a giant computer to come up with a cumulative loss figure? We really need to quantify this for the public. [Reverse Flow] ▪ Your study focuses on containers, not cars, correct? How did you include the impact from cars in the study? 	General Comments Patrick Pepper Mayor Pringle (Anaheim)
Logistics industry Practices	<ul style="list-style-type: none"> ▪ It doesn't seem to make sense to pick up goods from the docks, put them on trucks and then move them to other loading facilities. Why is this done? ▪ Part of the problem is that everything may move to Mexico because they are building a Natural Gas facility. Due to the cheap labor, container shops may move as well. 	General Comments

3. IMPACTS AND MITIGATION		Roy Reynolds, PRT Strategies
Impacts (community, environmental, health, and other local impacts)	<ul style="list-style-type: none"> ▪ There is too much emphasis here on emissions. Is the deck shared by the environmentalists? 	
4. RAIL RELATED		
Grade Separations	<ul style="list-style-type: none"> ▪ The Imperial Grade Crossing, I had terrible time gathering information and figuring out who's responsible for the project. I did find it costs about 70 million dollars, which is just too much for that type of construction. [Environmental Mitigation] <ul style="list-style-type: none"> ▪ More aggressive environmental mitigation is needed, especially grade separations. OCTA is trying to get funding. What is the status? ▪ What is easier and less costly for grade separations – raising the roadway to clear the railroad tracks, or raising the railroad tracks to clear the roadway? 	General Comments

4. RAIL RELATED - CONTINUED	
Railroads	General Comments
<ul style="list-style-type: none"> ▪ To what extent is BNSF cooperating, have they taken a position yet? I live about 200 yards from the rail yard. I receive announcements from Lena Kent regarding other subjects but never the goods movement effort. ▪ Is the BNSF rail yard at capacity? ▪ BNSF is using their third rail as a "parking lot" for trains lined up trying to get into their Hobart Yard. These idling trains have forced local cities to construct huge walls to block these unsightly trains from view, but this doesn't help with the noise or pollution. This is affecting cities like Yorba Linda, Anaheim and La Palma that are in this area. Once the Imperial Highway overpass is built, BNSF will be adding a third rail to Esperanza Street down to Kellogg Drive. BNSF is doing whatever it needs to do to move more trains, regardless of the impact on neighboring communities. That is their goal - moving the freight, regardless of the consequences. ▪ In all of your strategies, are you looking at ways to include rail capacity as well? What are the funding sources? Could an extra track help, such as the Colton crossing? ▪ Will you please summarize BNSF relation to this effort? ▪ Railroads seem indifferent to residents as the trains roll by, blowing their horns in the middle of the night. Can the railroads be made to understand how grade separations benefit the public, and they should be part of this solution? ▪ Surprised that the railroads and ports are not more involved in this process. Have we considered congestion pricing as an alternative and to improve the flow of goods from the ports? 	
5. ALTERNATIVE TECHNOLOGIES FOR FREIGHT - N/A	

6. FUNDING		
Funding	<ul style="list-style-type: none"> ▪ Promote legislation through local (congress) and state (senators) representatives to require mitigation funds when trade agreements are signed. <p>[New Sources]</p> <ul style="list-style-type: none"> ▪ The MCGMAP seems to be a great study, but the bottom line is we can't build the improvements if we don't have the money. ▪ Is there any possibility of a consistent federal funding stream for goods movement? ▪ If we need \$50 billion in goods movement/mitigation improvements, we need to find a way of capturing \$5 billion per year for 10 years. What about private funding sources? <p>[Fair Share]</p> <ul style="list-style-type: none"> ▪ Can you please clarify what "Fair Share" means? Who decides what where "Fair Share" funding goes? <p>[Fair share, New Sources]</p> <ul style="list-style-type: none"> ▪ Are our legislators demanding our fair share of goods movement funding in Washington, DC? The next federal act is set for approval by late 2009, and Southern California needs a greater share for what we call "the nation's loading dock." ▪ What about the proposed new tax on gasoline? ▪ Congratulations to Wilbur Smith Associates for bringing together millions of people in seven counties – this helps us speak louder and say that "we're mad as hell and aren't going to take it any more." ▪ We need a big, fat dollar amount that we can tell the public – the cost of doing these projects vs. the cost of not doing them. <p>[Federal Role]</p> <ul style="list-style-type: none"> ▪ When is the Federal Government planning on getting involved? The CARB released studies that show 12,000 cases of cancer are registered yearly, this is serious! Safety is a great challenge! 	Patrick Pepper General Comments General Comments General Comments General Comments

7. SECURITY	
Security	<ul style="list-style-type: none"> ▪ Isn't security a factor in all of this? At least in terms of additional costs and delays in through the ports?
Project information	<ul style="list-style-type: none"> ▪ Where can folks access the technical documents?
8. ENVIRONMENTAL JUSTICE - N/A	
9. NEXT STEPS	
Future Planning	<ul style="list-style-type: none"> ▪ I share Mayor Pringle's concern that traffic and congestion aren't separately shared issues and specific problems to solve. Also, container transit and local truck traffic are issues that can be separately planned for and dealt with.
	Roy Reynolds
	General Comments

Riverside County Workshop – December 10, 2007

1. PLANNING PROCESS AND COMMUNITY OUTREACH		
Topic	Questions, Perspectives and/or Concerns	Source of Comments
Outreach and Agency Coordination	<ul style="list-style-type: none"> ▪ Need to coordinate with railroads. 	General Comment
2. POTENTIAL GOODS MOVEMENT IMPROVEMENT, STRATEGIES AND PROJECTS		
Alternatives and Factors Analyzed and/or Considered	<ul style="list-style-type: none"> ▪ Factors to consider for SR-86 / Mexico include federal funding, inter-commerce, and national security. ▪ Conception Plan is ok, but there were not any specifics given to make comments possible. However, I think there are better places for railyard/head/spars than Mira Loma in terms of mobility and environment. ▪ Mira Loma is not the best location for a warehouse. ▪ What was the criteria for Inland Ports? Why are there not more in Riverside County? ▪ How can we become an Inland Port along SR-86? 	<p>Steven Hernandez</p> <p>Stephen Anderson, Resident</p> <p>Steven Hernandez</p> <p>Tim Brown</p>
General Project Information	<ul style="list-style-type: none"> ▪ Proposed sound walls do not mitigate freeways or any impacts related to trains or trucks. ▪ How are projects prioritized? ▪ What are the limits for an additional lane on the I-10, east of Monterey? 	Betty Anderson, Resident
Project Information		Tim Brown
Project List (Additions)	<ul style="list-style-type: none"> ▪ Riverside County Proposed Goods Movement Projects – add third lane (additional lanes) to SR-86 NAFTA Corridor Interchange Construction. 	General Comment

3. IMPACTS AND MITIGATION		
Control Measures	<ul style="list-style-type: none"> ▪ Emission reduction targets – theoretically, air quality can worsen despite mitigation efforts. 	Scott Novak, Resident
Impacts (Community, Environmental, Health and Others)	<ul style="list-style-type: none"> ▪ How will environmental concerns and mitigations be addressed? ▪ Riverside projects are prioritized based on factors such as safety, likelihood of construction within a specified timeframe, and cost. Only a limited number of projects can be implemented within a short term, i.e. must consider impacts of construction and accessibility within the city. ▪ Cost distribution – mitigation benefits do not benefit the local community. ▪ Current improvements are not enough. ▪ Trains are still coming the local community, however, the proposed grade separations are only planned in other communities, Riverside, etc., but not in Mira Loma. ▪ Trucks from Mexico don't meet EPA standards – how will this be controlled? ▪ The proposed cleaner strategies will not offset the impact of increased truck traffic – the only solution would be to stop building. 	Thomas Boyd Rachel Lopez, Center for Community Action and Environmental Justice
	<ul style="list-style-type: none"> ▪ Has lived in Mira Loma for many years and has been affected by the encroachment on the quality of life - land use for development doesn't benefit Mira Loma (funds are used elsewhere) – there should be a benefit for infrastructure and improved quality of life. ▪ What type of requirements are imposed on trucks coming from the Mexican borders? ▪ Local frustration with trucks – submitted complaints to the City, however, there has been no change. ▪ Issue of local residents that drive out of area for employment; while those that work locally are driving from a distance. 	Colleen Smethers, Resident

4. RAIL RELATED		General Comment
Grade Separations	<ul style="list-style-type: none"> ▪ What grade separation project will be in Mira Loma, specifically in Bell Grave? 	
Train Idling	<ul style="list-style-type: none"> ▪ Idling is a problem for electric trains – electrification. 	Tim Brown
	<ul style="list-style-type: none"> ▪ What type of guarantee does the Action Plan provide? 	Colleen Smethers, Resident
	<ul style="list-style-type: none"> ▪ The Draft Action Plan only considers goods, what about people? 	Steven Hernandez
5. ALTERNATIVE TECHNOLOGIES FOR FREIGHT – N/A		
6. FUNDING		
Funding	<ul style="list-style-type: none"> ▪ Who decides how funds are distributed? ▪ Out of 61 grade separations, can't fund all of them. ▪ Attack a little bit at a time as funding is available. ▪ Has funding model changed? 	Colleen Smethers, Robert Tock, Jurupa Community Services District
7. SECURITY – N/A		
8. ENVIRONMENTAL JUSTICE – N/A		
9. NEXT STEPS – N/A		

San Bernardino County Meeting – January 9, 2008

1. PLANNING PROCESS AND COMMUNITY OUTREACH		
Topic	Questions, Perspectives and/or Concerns	Source of Comments
Outreach and Agency Coordination	<ul style="list-style-type: none"> ▪ As mentioned at the Palmdale workshop, Kern COG considers it of prime concern that Kern county's and the San Joaquin Valley's Goods Movement Plans and activities be wrapped into this Action Plan. SR58 from the coast to Barstow (and eastward when it becomes I-40) is one of the state's major corridors. Its role when I-5 closes at the Grapevine (because of weather or fires) is heightened. We have been working closely with SCAG's Goods Movement team for years and Kern COG very much desires that this relationship would be extended from Metro as that agency takes on an implementation role. ▪ BNSF/UP are expanding the Tehachapi pass – this means the trains will increase from 35 per day to 60. Action Plan needs to involve statewide strategies, including Kern County; the current partner agencies are not sufficient. 	Marilyn Beardslee, , Kern Council of Governments
2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS		
General Project Information	<ul style="list-style-type: none"> ▪ Define user fees, island port and evaluation criteria used in the Action Plan. 	Marilyn Beardslee
Alternative and factors analyzed and/or considered	<ul style="list-style-type: none"> ▪ Provide clarification on Dedicated Freight Guideway System – a high speed, high volume corridor, i.e. Maglev, Truck Lanes. 	Marilyn Beardslee
Alternatives and factors analyzed and/or considered	<ul style="list-style-type: none"> ▪ Define regional vs. intra-regional. ▪ Have there been noticeable changes since this Plan was developed, i.e. higher fuel prices. ▪ Infrastructure changes are long term – freight system, transportation system – given the projected growth, what will the capacity be? Will it accommodate projections? 	Marilyn Beardslee

3. IMPACTS AND MITIGATION	
4. RAIL-RELATED – N/A	
5. ALTERNATIVE TECHNOLOGIES FOR FREIGHT – N/A	
6. FUNDING	
Funding	<ul style="list-style-type: none"> ▪ [Need] more detail as to dollar allocation. ▪ Toll charges should be used to expand truck lanes and not wait for governmental funding. Private funding for projects such as E220, with toll charges, would allow this type of project to be built on a more timely basis. In addition, a truck toll lane Northbound on I15 from the Inland Empire to the High Desert (Victorville area) could be private funding to speed up the project. In summary, the users should pay for new freeways and widening of existing freeways for a toll truck lane, and not depend on taxpayers for funding. <p>[Fair Share]</p> <ul style="list-style-type: none"> ▪ The solution would include federal support and recognition of the impact and burden of goods on the area despite the fact that the majority of goods leave the area or imposing fees on goods through the ports. <p>[Federal Role, User Fee]</p> <ul style="list-style-type: none"> ▪ Final report needs to emphasize as strongly as possible that 77% of San Pedro port related traffic goes outside the seven county region. A large proportion of funding should be federal or user fee based. <p>[Project List]</p> <ul style="list-style-type: none"> ▪ For the San Bernardino project list, how do these projects intercept with the High Desert Corridor, Colton Crossing, Southern California Logistics Airport, and Intermodal Facilities. ▪ Does the San Bernardino project list included in the \$40 billion estimated cost identified in the Action Plan? <p>[User Fees]</p> <ul style="list-style-type: none"> ▪ Who would have the authority to impose user fees? A: Currently, it is the Ports or ACTA. This would still need to be defined.
	<p>Kent Hindes, Cushman & Wakefield</p> <p>Harold Wright, TPM Investments</p> <p>Marilyn Beardslee, Kern Council of Governments</p> <p>Carlton Waters, Urban Crossroads, Inc.</p> <p>Marilyn Beardslee</p>

7. SECURITY – N/A
8. ENVIRONMENTAL JUSTICE – N/A
9. NEXT STEPS – N/A

San Diego County Workshop – February 21, 2008

1. PLANNING PROCESS AND COMMUNITY OUTREACH		
Topic	Questions, Perspectives and/or Concerns	Source of Comments
Implementation Principles	<ul style="list-style-type: none"> ▪ Are your "Implementation Principles" the same as what is stated in the statewide goods movement plan? 	General Comments
MCGMAP Plan Approval and Integration with Other Plans	<ul style="list-style-type: none"> ▪ Which plan takes precedence? The MCGMAP or RTP? 	General Comments
2. POTENTIAL GOODS MOVEMENT IMPROVEMENTS, STRATEGIES AND PROJECTS		
Alternatives and Factors Analyzed and/or Considered	<ul style="list-style-type: none"> ▪ Are you targeting a truck strategy? 	General Comments
Alternative technology	<ul style="list-style-type: none"> ▪ Is the technology that you recommend that same as the State's plan? 	General Comments
3. IMPACTS AND MITIGATION		
Impacts (Community, Environmental, Health and Others)	<ul style="list-style-type: none"> ▪ You need to outreach to neighborhoods, such as Barrio-Logan, that are heavily impacted by truck traffic. ▪ There is a new border crossing (in San Diego County); you should be aware of this and reach out to this community. ▪ The City Heights (or "Mid-City") community off the I-15 Freeway is heavily affected. We will not allow truck traffic through this stretch of the freeway. The environmental and community impacts in the area are severe. This community wants to remain very involved with this process. ▪ Are "our" issues included in your Existing Issues document? Or just the macro issues? 	General Comments

4. RAIL-RELATED – N/A	
5. ALTERNATIVE TECHNOLOGIES FOR FERIGHT – N/A	
6. FUNDING	
Funding	<ul style="list-style-type: none"> ▪ What are the private sector funding strategies [did] you assume?
	General Comments
7. SECURITY – N/A	
8. ENVIRONMENTAL JUSTICE – N/A	
9. NEXT STEPS – N/A	



naiop
National Association of
Industrial and Office Properties

The Forum for Commercial Real Estate

SoCal Chapter

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March 17, 2008

Ms. Shahrzad Amiri
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2393

Re: Multi-County Goods Movement Action Plan

Dear Ms. Amiri:

The SoCal Chapter of the National Association of Industrial & Office Properties (NAIOP) is the largest commercial real estate organization in Southern California and one of the largest chapters in the United States, encompassing more than 1,200 members in Orange and Los Angeles Counties. The Chapter provides a unified voice to protect and enhance the commercial real estate industry and quality of life in Southern California. NAIOP SoCal is proactively involved in public policy and provides members with comprehensive educational programs and interactive business relationship opportunities. We appreciate the opportunity to provide our input on the draft Multi-County Goods Movement Action Plan.

Improving transportation and goods movement is NAIOP SoCal's highest priority because of the impact the issue has on NAIOP members and the overall economic vitality and quality of life in the region. As the representative of the Chapter's over 1,200 members and the 5.4 million workers who travel on the roadways to work in the office and industrial buildings in Los Angeles and Orange Counties and who provide the distribution facilities for the distribution of goods throughout the country.

NAIOP SoCal commends the Multi-County Goods Movement Action Plan ("MCGMAP") partners for guiding the preparation of this strategic plan, and is pleased to be a participant in the Stakeholders Advisory Group. We support efforts to have the Plan adopted by public agencies and to work closely with private sector organizations and individuals in its implementation.

NAIOP SoCal has reviewed the draft Plan, dated October 2007, from the perspective of our members, the majority of whom live and work in Southern California. We also have viewed the draft Plan as developers, owners and operators of industrial and office facilities. We find the Plan to be a well-prepared and constructive effort to address monumental challenges in the movement of goods facing our region in the coming decades. Our appreciation is extended to all the MCGMAP partners and Metro staff for this effort.

*An alliance of Southern California chapters serving the commercial real estate community:
Orange County / Los Angeles • Inland Empire • San Diego*

As a result of our review we would like to offer the following observations, comments and recommendations:

1. We agree that MCGMAP partners have defined roles and responsibilities, and cannot fully implement many of the strategies alone. We also agree with your recommendation that continued collaboration and consensus building is needed. However, we would like to encourage a high level of involvement with both private sector organizations, such as NAIOP, and elected officials at the state and federal levels, to effectively design and implement recommendations of the Action Plan. We feel this is critical, since the support from these two groups is essential in advocating that other regions that benefit from goods moving through Southern California should bear a share of the costs for various infrastructure and other improvements.
2. The Stakeholder Advisory Group has questioned whether our Los Angeles and Long Beach ports should necessarily shoulder the capacity burdens that have been projected in the MCGMAP. The question has been raised as to whether some of this port demand should be diverted to alternate locations, either along the West Coast or Mexico. We do not believe that diversion to other ports is necessary, but rather that more efficient ways, both logistically and environmentally, should be found to move the goods.
3. The MCGMAP recommends the development of guidelines for local jurisdictions to use in siting and designing goods movement related land uses and transportation facilities. We believe that sufficient guidelines already exist and are being utilized by local jurisdictions for zoning and land use planning. However, should any jurisdictions pursue such guidelines, we strongly encourage that this be undertaken as a joint effort between the local jurisdictions and practitioner groups, such as NAIOP and the Building Industry Association, to be most effective.
4. In view of the complexity of confronting the challenges of goods movement in Southern California over the next 25 years, we feel that the MCGMAP should encourage and explore innovative and creative solutions by both public and private sector groups. The MCGMAP takes a step in this direction by encouraging vehicle and equipment manufacturers to find cleaner alternatives to oil-based fuels, and by supporting the Regionally Significant Transportation Investment Study to evaluate the feasibility of a dedicated freight guideway system. We applaud this effort and encourage the MCGMAP partners to aggressively pursue these ideas.
5. NAIOP SoCal supports voluntary efforts to embrace sustainable building practices that will result in lowering greenhouse gas emissions, conserve water, non-renewable resources and produce more environmentally friendly workplaces. We feel that it is essential to work together with the MCGMAP and Stakeholder members to adequately address environmental issues associated with goods movement facilities, including warehousing and distribution buildings, offices and transportation improvements. NAIOP supports reasonable and attainable modifications to the California building codes to assist in the implementation of AB 32.
6. We agree that Southern California has been receiving a disproportionately low share of federal funding for transportation improvements, despite efforts by our elected and appointed officials, as well as private sector organizations. With the adoption of the MCGMAP, we feel that pertinent and salient data and analysis are now available to more adequately make a case for not only more federal funds, but also increased collaboration and cooperation at the

state and federal level for cost sharing of proposed improvements that provide benefits well beyond Southern California.

7. We agree that there should be continued discussions with private sector and stakeholders to seek support in addressing goods movement impacts and filling funding gaps. We believe that the discussions should focus on the use of incentives and the delivery of tangible system-wide improvements, and not a focus on user fees. It is vitally important to develop a clear and concise message on this issue and effectively communicate this to the public and policy and funding decision makers

We recognize that considerable effort has gone into the preparation of the MCGMAP and strongly urge the MCGMAP partners to aggressively pursue implementation through a concerted effort of public and private sector collaboration. NAIOP has been proactive in facilitating solutions to goods movement issues not only in Southern California, but nationally, through our national headquarters staff and proactive organizations, such as the Coalition for America's Gateway's and Trade Corridors. We look forward to the opportunity to assist in the implementation of the MCGMAP.

Thank you for the opportunity to comment on the final draft of the Multi-County Goods Movement Action Plan.

Sincerely,



James V. Camp
Legislative Action Committee Chair



Vickie Talley
Director of Legislative Action

cc: NAIOP SoCal Board of Directors
Orange County Transportation Authority Board of Directors and Executive Officer
Los Angeles County Metropolitan Transportation Authority Board of Directors and Executive Officer



MAJESTIC REALTY CO.

3191 Crossroads Parkway North, Sixth Floor • City of Industry, CA 91746-3467

Office: (562) 693-9581 • FAX: (562) 695-2229

DATE: March 17, 2008

TO: Multi-County Goods Movement Action Plan – Agency Partners.
Los Angeles County Metropolitan Transportation Authority
Orange County Transportation Authority
Riverside County Transportation Commission
San Bernardino Associated Governments
Ventura County Transportation Commission
California Department of Transportation – Districts 7, 8, 11 & 12
San Diego Association of Governments
Southern California Association of Governments

RE: Multi-County Goods Movement Action Plan Comments

In response to your request for comments regarding the final draft of the Multi-County Goods Movement Action Plan (MCGMAP), Majestic Realty Co. would like to begin by acknowledging the significant work that has gone into the preparation of this multi-county effort. We have appreciated the opportunity to participate as a member of the Stakeholder Advisory Group and look forward to our continued collaborations.

We believe that this focused effort speaks volumes to the importance of goods movement to our regional and national economy. In fact, it was this effort that laid the ground work for our region's timely TCIF submission. Without the work that had previously been done in bringing the various counties and agency partners together to discuss these complex issues, we do not believe that our region would have been able to submit a consensus request.

As we all know, our region's needs significantly outpace our current levels of available funding. Collaboration will be key as we continue to pursue integrated solutions. Future progress will require continued coordination across regional jurisdictions and levels of government, and with industry and community groups alike.

We encourage you to keep pressing forward for "simultaneous and continuous" system-wide solutions. Our multi-faceted supply chain is complex and this effort clearly reveals the need for comprehensive solutions.

Moving forward, we are committed to remain active stakeholders, working together to find solutions that are essential to support the future economic prosperity and enhance the quality of life throughout our region. We encourage you to continue to engage a broad base of industry partners in future efforts, so that we may continue to work toward systems-solutions that are comprehensive and sustainable.

Sincerely,

MAJESTIC REALTY CO.



Fran Inman
Senior Vice President

cc: Edward P. Roski, Jr



March 17, 2008

RE: Multi-County Goods Movement Action Plan (MCGMAP) Draft

Dear MCGMAP Member Agencies,

On behalf of the Inland Empire Economic Partnership, I would like to express our support and appreciation for the efforts of your agencies to develop a comprehensive and collective Southern California approach to our mutual issues.

The detailed technical analyses provided by the MCGMAP team has been ground breaking in the scope of details explored, and will certainly prove to the foundation of future endeavors in this area.

Beyond the technical merits of the draft plan and the effort involved, we would like to highlight the salutary benefits this process has brought to the Southern California region. By creating a mechanism to convene the disparate agencies for specific discussions related to goods movement and trade infrastructure, the MCGMAP process has doubtlessly helped to create and encourage the regional unity exemplified in the Southern California Consensus Group and its stalwart advocacy on Proposition 1B's TCIF on behalf of the impacted agencies and the residents and businesses contained within their areas of responsibility.

In this spirit, I congratulate you for the success of your efforts and for their contributions to Southern California. We look forward to the future progress of the MCGMAP collective and its individual agencies.

Sincerely,

Bill Carney
President & CEO



CITY HEIGHTS

Community Development Corporation

March 17, 2008

Michelle Smith, Metro Project Manager
South Counties GMAP Project Partners
One Gateway Plaza, MS 99-22-8
Los Angeles, Ca 90051

BY: Fed Ex and Email: goodmoves@metro.net

RE: Comments on Multi-County Goods Movement Action Plan

This is to provide comments on behalf of the City Heights Community Development Corporation (CHCDC) on the "Multi-County Goods Movement Action Plan" (MCGMAP). We have been directed to submit comments to you by Sam G. Morrissey, PE of Wilbur Smith Associates.

CHCDC has participated in a number of working groups (including the SANDAG Freight Working Group) and submitted testimony and formal comments to the San Diego Association of Governments (SANDAG) regarding the Goods Movement Action Plan (GMAP) for San Diego County with special concerns regarding the SR-15 segment of I-15. We also participated and presented comments and materials to the MCGMAP Public Workshop held in San Diego on February 21, 2008. It appears that our comments to the SANDAG Freight Working Group and actions of the SANDAG Board of Directors in adoption of the 2030 Regional Transportation Plan update in November 2007 have NOT been incorporated into the MCGMAP.

The MCGMAP Executive Summary (ES) repeatedly makes reference to the problems related to truck traffic pollution in neighborhoods and communities. This is mostly discussed in regard to trucks exiting freeways and intruding into local neighborhood streets. The MCGMAP does not appear to consider the problems of communities that are dissected by freeways that are designated for Goods Movement.

The SR-15 Mid City segment of I-15 in San Diego, between SR-94 and I-8, was reviewed and constructed in the late 1980s to 1990's. The freeway was opened for service in 2000. Memoranda of Agreement (MOA) in 1985 and of Understanding (MOU) in 1993 were signed between the City of San Diego and the State of California to provide for mitigations to some of the significant effects of the construction of a freeway cutting through the densely populated Mid City San Diego communities of City Heights, Normal Heights and Kensington. A summary is attached with includes pertinent excerpts of the 1985 MOA and 1993 MOU.

One of those mitigations in Section 9 in the SR 15 (40th Street Corridor) Memorandum of Agreement from May 1985 states that, "The State will, to the extent feasible, sign and direct truck traffic to the I-805 facility as an alternative to Route 15 through Mid City."

The 2007 San Diego adopted 2030 RTP clearly recognizes the significance of a high density community being dissected by a freeway. In recognition of the preexisting mitigation to divert truck traffic from I-805 the RTP section on GMAP and Appendix B, Figure 1b show the deletion of the GMAP designation for the area between the I-15 - I-805 intersection and the I-15 - SR-163 intersection. No alternative route is provided to provide for Goods Movement related traffic to recenter the I-15 freeway. A route was suggested to the SANDAG Freight Working Group and reiterated at FWG meeting in September 2007. This gap leaves an incomplete network by not providing a specific route for trucks running through the I-15. Page B-6, Table B.1 in the 2030 San Diego RTP clearly states that "I-15 between I-805 and SR 163 was removed from the GMAP network in November 2007".

It should also be noted in the MCGMAP that according to page 6-30 in the same adopted SANDAG 2030 RTP "Dedication or construction of additional lanes for HOV or other uses in the SR 15 Mid-City segment of I-15 is contingent on the completion and operation of BRT stations and system improvement pursuant to agreements between the State and City of San Diego."

The MCGMAP ES, Page 6 in the Draft Summary mentions that 1.4 million trucks worth of goods cross the Olay Mesa POE in both directions. These trucks are mainly fed into freeways I-5, I-805 and I-15. Various combinations of these freeways connect San Diego (the border and the Port) with Los Angeles and Riverside respectively. Since the current RTP GMAP does not call out a specific route to take, trucks seeking to use the designated GMAP route up I-15 will be likely to take SR-15 Mid-City segment, because it may appear to be the shortest route. Recommending an alternative route (such as taking I-805 north - SR-163 North - I-15 North or vice-versa) would appear longer but it may in fact be quicker and reduce air pollution levels in high density adjacent Mid City communities, including City Heights which has two schools located within 500 feet of the freeway.

MCGMAP ES Page 24 - Table 4: indicates the number of schools within 1/3 of a mile from identified Southern California route "bundles". According to studies, schools should not be located within 500 feet from a freeway. Special attention should be given to rerouting trucks along routes which are at least 500 feet away from schools and proper monitoring should be provided to assure that there are not adverse impacts to the sensitive receptors at these locations. In addition, the alternative routes suggested here to move freight from the Port of San Diego and the Border to Riverside should be identified as other "bundles" in the MCGMAP.

The MCGMAP states at page 2: "Given their defined roles and responsibilities, the MCGMAP partners cannot fully implement many of the plan's recommended strategies on their own..." but according to the MCGMAP Draft Executive Summary 2007's Implementation Principles, Page 5, "1. **Guideline:** The Action Plan is the master plan for goods movement in Southern California and is intended to be used as guidance in the preparation of state, regional, and local transportation plans. The Action Plan can also be a tool for local jurisdictions to make informed land use decisions." This would appear to run counter to representations that the San Diego SANDAG 2030 RTP takes precedence in transportation planning and funding. If the MCGMAP is to be used as noted, it would appear that it requires proper environmental review. The 2030 San Diego RTP has a certified EIR completed and it excludes the GMAP designation for the Mid City SR-15 segment of I-15. By not expressly noting this at all points in the MCGMAP this document is inaccurate and misleads other jurisdictions and agencies in their planning and budgeting.

The MCGMAP can and should include the following guidelines and provisions :

- 1.- Clearly prioritizing health of sensitive receptors , e.g. "Health over Freight"
- 2.- Providing specific recommendations, e.g. "Redirect -- Reroute trucks and other mobile freight pollutants when schools are within 500 feet to the more restrictive 1/3 of mile from a dedicated Freight Guideway or other designated GMAP"

With these priorities explicit it will be easier for cities (regions) to create local plans that are compatible with specific restrictions already in place and produce a multi county plan with gaps such as the one that can be found in the 2007 San Diego RTP.

Please clarify if MCGMAP Page 17, the Specific Actions, last point, "implement a dedicated Freight Guideway system... I-15 to Victorville". refers to I-15 all the way South into San Diego? If that is the case it should be considered that the 2007 San Diego RTP has deleted a segment of the I-15 as part of the Goods Movement Network between the I-15 - I-805 intersection and the I-15 - SR-163 intersection and an alternative has not been identified.

This issue should be clarified.

Page 20-21, Figure 6: Map of Potential Future System identifies the San Diego segment of the I-15 as a Dedicated Freight Guideway. Again, it should be noted that the adopted 2007 San Diego RTP has deleted a segment of the I-15 as part of the Goods Movement Network (between the I-15 - I-805 intersection and the I-15 - SR-163 intersection).

Page 3 in the Draft Action Plan - San Diego, Figure 1 is inconsistent in the I-15 segment between the SR-163 intersection and the SR-94 intersection of the San Diego Region GMAP.

Michelle Smith, Metro Project Manager RE: COMMENTS ON MCGMAP

Page 4 of 4

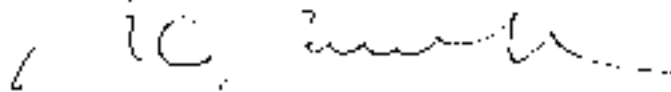
Table 9 in the Draft Action Plan – San Diego, which is based on Table B.1 of the San Diego Region RTP appendix B (Goods Movement Action Plan) does not take in consideration the Note on the bottom where it is stated that the I-15 between I-805 and SR 163 removed from GMAP in November 2007. This should be considered in order to draft a better and accurate Southern California GMAP.

Page 22, Stakeholders Outreach “Some stakeholders indicated that regional environmental and community impacts must be addressed and mitigated to a level beyond existing air quality attainment goals. However, the authority to increase air quality attainment goals rests with regulatory agencies such as the SCAQMD and CARB, not the MCGMAP partner agencies.”

Air quality attainment goals are regional and are measured within air basins, but we know that people closer to the pollution source directly breathe many pollutants before they spread outward. Those people are exposed to high levels of pollution and suffer the health issues described in page 7. A clearer strategy should be implemented to address this problem.

Thank you for the opportunity to comment about the Multi-County GMAP.

Sincerely,



Jay Powell, CHCDC Executive Director

Enc CHCDC Comments letter San Diego RTP
 CHCDC Comment letter San Diego RTP EIR

CHCDC Fact Sheet Summary Excerpts of Mitigations

SANDAG RTP documents and maps

THE CALIFORNIA RAILROAD INDUSTRY

March 17, 2008

Michelle Smith
Metropolitan Transportation Authority
1 Gateway Plaza
Los Angeles, CA 90012
Mailstop: 99-22-3

Re: Freight Railroad Comments on 2008 Draft Multi-County Goods Movement Action Plan

Dear Michelle:

On behalf of the Association of American Railroads and its Class 1 member freight railroads operating in California (BNSF Railway and Union Pacific Railroad, or the Railroads), we appreciate the opportunity to comment on the Draft Multi-County Goods Movement Action Plan (Draft Plan) strategies related to freight railroad operations. The Draft Plan addresses four (4) "action sets:"

1. Accelerate regional environmental mitigation
2. Relieve congestion and improve mobility
3. Improve operational efficiency
4. Develop equitable public/private funding strategy

The comments presented here will address the items pertaining to railroad operations in each of the action sets. Note that failure to comment on a particular item or portion of the Action Plan should not be interpreted as concurrence by AAR or the Railroads.

Action Item 1: Accelerate Regional Environmental Mitigation

Draft Plan	Strongly encourage EPA to rapidly finalize its proposed rulemaking for the Control of Emissions of Air Pollution from New Locomotive Engines and New Marine Compression-Ignition Engines Less Than 30 Liters per Cylinder.
Railroad Comment 1	EPA issued final regulations on March 14, 2008. The Railroads support these technology-forcing regulations. Leaders of environmental groups lauded the US EPA on their adoption of tough new locomotive standards. Janea Scott, staff attorney for Environmental Defense Fund, remarked "EPA deserves praise for issuing a final rule that is stronger than its original proposal." Richard Kassel, director of NRDC's Clean Fuels and Vehicles project said, "EPA has delivered a strong program that will go a long way towards solving the problem of diesel train and ship pollution in the future."

Draft Plan **Generation of public and/or private funds to accelerate the implementation of the air quality strategies contained in the Ports' Clean Air Action Plan, the California Air Resources Board's Emission Reduction Plan, the California Air Resources Board's Goods Movement Action Plan & the South Coast AQMD's Air Quality Management Plan.**

Railroad
Comment 2 The current SIP, CAAP and AQMP Plans already contain unrealistic assumptions regarding the availability of new locomotive technology. In some instances, these Plans propose that Tier 4 engines be introduced as early as 2012. However, When US EPA reviewed the technical information available, they concluded the new locomotive technology would not be available until 2015 at the earliest. The Railroads cannot dispatch new units to Southern California if they cannot purchase them. Even if Tier 4 locomotives were available earlier, because of the small number of brand-new locomotives produced annually the availability of these locomotives as early as 2012 would not make an appreciable difference in the region's air quality. The Draft Plan should not propose that the dates in the current SIP, CAAP or AQMP be accelerated in advance of the dates promulgated by US EPA.

Draft Plan **Investigation of the feasibility of advanced transportation technologies such as maglev and linear induction motors.**

Railroad
Comment 3 While the Railroads are supportive of the development of new technology, it seems unlikely that fixed guide-way system applications (such as maglev) will be feasible given costs, operating issues, and impacts on rail yard operations. The Railroads submitted comments to SCAG on the infeasibility of using a High Speed Rail Technology (HSRT) freight system in June and October 2007, and these comments are attached for your review.

Draft Plan **Implement engine idling restrictions for rail.**

Railroad
Comment 4 The Railroads support the reduction in unnecessary idling and have invested in idle reduction technologies since 2003. All new Tier 1 and Tier 2 locomotives are equipped with idle reduction devices. The Railroads are also retrofitting the intrastate locomotive fleet with devices to comply with the 2005 MOU with CARB. By June 30, 2008, all intrastate locomotives will be retrofitted with idle reduction devices that limit idling time to no more than 15 consecutive minutes unless extended idling is necessary for operational reasons. In addition, the Railroads voluntarily agreed in the 2005 MOU with CARB to exert their best efforts to limit the non-essential idling of locomotives not equipped with automatic idling reduction devices to no more than 60 consecutive minutes. The Railroads, however, do not support local rules or regulations that restrict idle duration and such local rules and regulations are clearly preempted by Federal and State law.

Draft Plan **Use low emission train engines or electrification.**

Railroad Comment 5 The Railroads have continuously invested in low emitting diesel and alternative fuel technologies for the past decade. BNSF currently operates four LNG switcher units in southern California, UP and BNSF have developed (with CARB) a diesel particulate filter application for two switcher locomotives, both BNSF and UP have invested in “green goat” hybrid battery switcher locomotives, and both BNSF and UP are currently operating low emitting “genset” switchers locomotives. Furthermore, both railroads have invested over \$300 million to purchase the cleanest available locomotives to comply with the South Coast fleet average agreement. As the Railroads purchase Tier 3 and Tier 4 locomotives, the fleet will continue to become even cleaner.

All previous studies of electrification in southern California raise insurmountable operational and cost-effectiveness issues that must be thoroughly considered in any public policy discussion. Electrification is cost prohibitive and would result in limited reduction of emissions.

In addition, ingress and egress from an electrified system presents safety and operational challenges relative to inadvertent contact with electric lines and lift machines avoiding catenaries.

The Railroads submitted comments to SCAG on the feasibility of freight electrification on February 15, 2008. A copy of these comments is attached to this letter. Please review these comments for more detail.

Action Item 2: Relieve Congestion and Improve Mobility

Draft Plan Fund and implement the use of on-dock rail according to the San Pedro Bay Ports Master Plans (Increase intermodal lift capacity).

Railroad Comment 6 Both BNSF and UP are on record supporting on-dock rail expansion at the Ports of Los Angeles and Long Beach. The Railroads also support the conclusions from the Ports Rail Master Plan that even with full development of all on-dock rail facilities, additional near dock facilities will be needed in order to prevent more containers from moving by truck rather than rail.

Draft Plan Increase intermodal rail lift capacity at near dock facilities

- **Modernize the Union Pacific Intermodal Container Transfer Facility (ICTF).**
- **Construct BNSF’s Southern California International Gateway (SCIG) near dock facility.**

Railroad Comment 7 Both BNSF and UP support the development of additional lift capacity near the Ports of Los Angeles and Long Beach. As indicated by the Draft Plan, and as clearly shown

in the Ports Master Rail Plan, even if all on-dock rail facilities are constructed in a timely manner, there still will be a need for additional lift capacity at both ICTF and SCIG. Without the development and modernization of these facilities, more containers will move by truck rather than by train. Both the BNSF and the Union Pacific projects are needed to increase intermodal rail lift capacity because container traffic moves under long term contracts to one Railroad or the other. Selection of rail carrier is often dependent as to which rail carrier serves a destination most efficiently, and each carrier does not serve all destinations. For this reason container traffic will not necessarily switch from one railroad to another but rather will move from train to truck. Both BNSF and UP have proposed to develop the cleanest intermodal facilities in the world. The Railroads agree with the Draft Plan when it states: "The biggest constraint to the movement of goods is intermodal lift capacity. Shifting freight from trucks to rail will require increased capacities and systems to allow more goods to quickly transfer from various modes (intermodal lifts); thereby minimizing the interim drayage truck movements." (chapter 6 pages 6-11) The development of the SCIG and the modernization of the ICTF are necessary to ensure that intermodal lift capacity is increased to minimize modal shift and maximize the use of rail transportation with its inherent environmental benefits.

Draft Plan
Railroad
Comment 8

Increase mainline rail capacity.

The Draft Plan recommends significant expansion of the railroad mainlines operating in the study region. The Railroads recognize that investment in rail expansion and rail efficiency is necessary to accommodate projected freight levels, but object to being taxed to fund those improvements. The Draft Plan proposes that the private railroads pay fees to a public entity to fund those investments. The Draft Plan is flawed inasmuch as it recommends that governmental planning organizations with little or no expertise in national freight rail operations serve as a strategic planning entity determining when and how private rail lines should be expanded. Network development and design is complicated and involves analysis of more than just mainline expansion in a single region. Decisions concerning investment in terminals, rail yards, locomotives, freight cars and siding capacity must be considered in light of trends across the spectrum of national freight demands, along with other investments in other areas outside of the SCAB region to prevent bottlenecks. While international intermodal freight is an important component of rail business, the Railroads have critical network needs (and capital demands) for a host of other customers around the country: wheat, corn and other agricultural products from the Midwest; coal and other minerals from mining operations around the country; industrial products; and automobiles. When and where rail capacity investment on individual rail systems is needed is a question that requires constant review and revision, is affected by changes in market demands and business cycles, and does not lend itself to the sort of long-term planning that may be more appropriate for a regional government agency

planning improvements to an existing highway system. It is imperative Railroads retain authority, and the flexibility that comes with that authority, to make changes to capital investment plans as warranted by changing circumstances over time. Accordingly, while the Railroads agree that continued investment in system capacity is necessary, having a public agency be involved in determining the need for investment and then taxing the industry to pay for these investments would not be economically efficient.

Draft Plan Eliminate rail bottlenecks - Construction of the Colton Crossing rail-rail grade separation.

Railroad
Comment 9 Construction of the Colton Crossing grade separation will provide significant public benefits. The Railroads have submitted a Public Benefits Analysis (January 2008) of the Colton Crossing project to Caltrans and the CTC, and this study is attached for further review.

Draft Plan Grade Separation - Implement the Alameda Corridor East (ACE) Trade Corridor railroad grade crossing improvement program for all counties involved.

Railroad
Comment 10 The Draft Plan identifies many new grade separation projects (projects which separate rail and road intersections). Standard grade separation projects do not enhance velocity, throughput or capacity for railroad operations. Instead, such projects provide a distinctly public benefit by moving vehicles resulting from nearby development over or under rail lines. The National Highway Trust Fund, other federal sources, and contributions by the state and local sector are possible sources for funding these proposed improvements.

Draft Plan Metrolink - “Passenger train (commuter rail) volumes [are projected to] escalate to 140 by 2025 from 58 in 2000, an increase of one and half times or 150%.”

Railroad
Comment 11 The Draft Plan proposes a significant increase in the number of Metrolink trains that would operate on private rail lines. Although the Draft Plan may provide for a funding mechanism to generate revenue to assist in the funding of such service, the assumption that such service level is achievable is premature. Any Metrolink expansion, if even possible on freight corridors, will have to be negotiated in the future by the interested parties.

Action Item 3: Improve Operational Efficiency

Draft Plan Develop public/private partnerships to research and develop advances in goods movement transportation technologies.

Railroad
Comment 12 The Association of American Railroads has published a “position paper” on public/private partnerships which is attached to these comments for your review.

Action Item 4: Develop Equitable Public/Private Funding Strategy

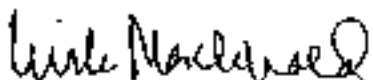
Draft Plan **Negotiate user fees with industry that can be included in a project-specific finance plan to improve goods movement and air quality. Fees discussed include container fees, fees to support revenue bonds, and gate fees.**

Railroad Comment 13 There are many freight projects that provide extensive public benefits—such as environmental enhancements and improved freight efficiency— that a private railroad would not otherwise fund, due to the constraints of capital budgets or the lack of a sufficient return on investment. Public funding in these instances is appropriate and does not represent a public subsidy of private beneficiaries, since a rail carrier would contribute financially commensurate with its benefit, if any.

Where the benefits lie solely with the private railroad, the Railroad supports the principle that it pay for these improvements. However, a fee on rail container movements should not be utilized to pay for projects with predominantly public benefits.

Thank you for the opportunity to provide comments. If you have any questions or concerns, please call me at 415-421-4213 x 12 or Peter Okurowski at 925-339-3500.

Sincerely,



Kirk Marckwald
Principal, California Environmental Associates
On behalf of the California Railroad Industry

cc:
Hasan Ikhata, SCAG
Mary Nichols, CARB

March 14, 2008

Ms. Shohrzad Amiri
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2393

Re: Multi-County Goods Movement Action Plan

Dear Ms. Amiri:

On behalf of Watson Land Company, I would like to offer support for public agency adoption and implementation of the "Multi-County Goods Movement Action Plan" (MCGMAP). As a Southern California based company with interests in diverse parts of the region, Watson Land Company understands the imperative of a strong and effective logistics system, which will generate unprecedented economic benefits for our area and the country. We are pleased to be a member of the MCGMAP Stakeholders Advisory Group and actively participating in the development of the Draft Plan.

We have reviewed the final version of the draft MCGMAP, dated January 31, 2007, which contains a very constructive framework for confronting the complex challenges associated with the movement of goods in the Southern California region. We believe that the MCGMAP has already stimulated a positive set of "actions" by initiating the Southern California Consensus Group, which is targeting the region's "fair share" of Proposition 1B Trade Corridor Improvement Fund (TCIF) revenues. It is our understanding that the high priority projects identified by Consensus Group and nominated for TCIF funding by the California Transportation Commission are consistent with the MCGMAP program. Both public agencies and the private sector now have a unique opportunity to build on this Consensus Group program foundation, and aggressively pursue other elements of the MCGMAP.

Let me offer a few additional comments on implementation of the MCGMAP:

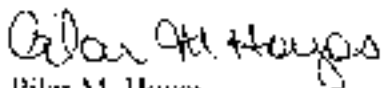
- 1). While the Plan contains an "Implementation Principle" regarding land use compatibility, we strongly urge that more consideration be given to implementing creative and effective solutions associated with market driven land use decisions. Future logistic facilities will be greatly influenced by local land use decisions, which may not reflect regional goods movement needs and priorities. These potential barriers need to be anticipated and addressed.

- 2). In the section of MCGMAP identifying the "action sets," there is a proposal for development of a private sector funding strategy. Further, "Action Set 4" proposes a "private sector contribution" targeted to support future projects. It is important for Metro to place this private sector role within the context of other "fee" driven policy discussions currently under way. For example, Metro has been developing a congestion impact fee for future consideration by the Board of Directors. To date, there has been no discussion on how the potential impact fee would relate to the "user fee" envisioned in the MCGMAP. In addition, as currently drafted the proposed impact fee could be imposed on some of the same facilities indemnified in the MCGMAP as important elements of the regional logistics system. In addition, we want to emphasize that the collection of fees without a streamlined process for building the infrastructure for which it is intended would render this only a "plan" without action and results.
- 3). MCGMAP contains a section entitled "Next Steps" which references a proposal to include Mobility 21 and other organizations in the development of new federal funding sources to support priority goods movement projects in Southern California. While this advocacy activity is important, we urge that the role for Mobility 21 and other organization including the Southern California Leadership Council be extended into other aspects of the MCGMAP. It is important to forge a sustained and effective working framework for wide-range private sector participation, in order to translate this policy document into reality.

Thank you for the opportunity to comment on the MCGMAP.

We look forward to our continued working relationship with Metro.

Sincerely,



Pilar M. Hoyos
Vice President, Public Affairs



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • <http://www.aqmd.gov>

March 17, 2008

To: MCGMAP Project Partners and Consultants

Re: SCAQMD Staff Comments on Draft
Multi-County Goods Movement Action Plan

Thank you for the opportunity to submit these comments on the Draft Multi County Goods Movement Action Plan (“Action Plan”). The staff of the South Coast Air Quality Management District has participated in the Stakeholder Advisory Group for the Plan since its inception. This planning effort holds great promise because the project partners are multijurisdictional and can take a regional perspective to create *a vision for an optimal freight transportation system for Southern California*. The infrastructure that the project partners construct is important for air quality because the public health impacts of diesel exhaust are significant and localized, making infrastructure design, capacity and emissions control critical. Moreover, controlling emissions from goods movement is essential if this region is to attain federal air quality standards, and key emission control technologies such as rail electrification are inextricably tied to infrastructure.

We commend the project partners for their thought and analysis, and, in particular, for including the following among the objectives of the plan: achievement of “simultaneous infrastructure and air quality improvement;” accelerating regional environmental mitigation through project-specific mitigation *and* broader regional “powertrain” cleanup strategies; maximizing on-dock rail; and encouraging land use decisions that separate goods movement infrastructure and sensitive receptors such as residential areas, schools, and hospitals.

Despite the promise of this multi-county planning effort, we are concerned that an insufficient range of potential transportation systems has been analyzed to enable policy makers to design an optimal freight transportation system. In addition, the alternatives that were analyzed were not analyzed for air quality impacts, limiting key information available to policymakers. The Action Plan also needs to more fully describe mechanisms to achieve air quality goals, and must ensure that full project level review occurs before specific projects are assumed to be appropriate.

We thus urge that the Action Plan be augmented, as described below. We appreciate that some of the issues described below are designated in the Action Plan for further study.

The AQMD staff would be pleased to assist in any way we can in this effort. Our goal in providing these comments is to assure that the Action Plan fulfills its potential and garners the public consensus necessary for successful implementation. These comments are consistent with AQMD staff comments submitted by letter dated August 1, 2007.

Background: Air Quality Needs. The 2007 SCAQMD *Air Quality Management Plan* (AQMP) plainly shows that expeditious implementation of advanced control technologies for goods movement sources will be needed for this region to timely attain federal annual PM_{2.5} and 8-hour ozone ambient air quality standards by applicable deadlines (2015 and 2024, respectively), and to reduce local toxics risks. Even with aggressive implementation of advanced control technologies, the AQMP still contains a substantial “black box” of yet-to-be-defined NO_x and VOC measures. These black box measures account for 54% of the total emission reductions needed to attain the federal ozone standard in 2024. In addition, EPA recently established a new 24-hour PM_{2.5} ambient standard with a likely attainment deadline of 2019, as well as a more stringent ozone standard. Preliminary analysis indicates that implementation of the AQMP measures to achieve the annual PM_{2.5} and previous 8-hour ozone standards will leave the region 49% above the new 24 hour standard in 2020 unless further emissions controls are implemented. Finally, recent health risk assessments have found high cancer risks – over 700 in a million – near Southern California railyards, due to diesel particulate matter emissions from locomotives, trucks and cargo handling equipment. The AQMD’s recent Multiple Toxics Exposure Study (MATES III) similarly found regional cancer risks of 1,200 in a million, again primarily due to diesel particulates.

Key Goods Movement Emission Control Issues. In light of the above factors, the key air quality issues that the Action Plan must address are —

- how to ensure implementation of advanced control technologies for sources such as marine vessels and locomotives since federal and international standards for such sources have historically been inadequate to meet the needs of this region,
- how to expedite retrofit or replacement of heavy-duty trucks, locomotives and marine vessels since the most stringent regulatory emissions standards generally apply only to new units, and these sources have long useful lives, and
- how to ensure that the goods movement facilities are designed and sited so as to avoid unacceptable local and cumulative impacts from toxic air contaminants, chiefly diesel particulate matter.

Comments on Action Plan. We submit the following comments in the spirit of seeking an Action Plan that will successfully reduce congestion and address the issues described above.

- 1. Public Support is Critical.** As is recognized in the technical memoranda, many goods movement plans and projects have been met with community concerns and

opposition due to environmental impacts. Such concerns have been grounded in forecasts of doubling and even tripling of cargo movement, and in the large and growing body of evidence that air emissions related to goods movement activities — notably particulates and diesel exhaust — are contributing to serious health impacts. These impacts include thousands of premature deaths per year from regional particulates, significant cancer risks near transportation corridors, asthma, risk of permanently reduced lung function among children growing up in high particulate areas, heart disease, and other impacts. Concerns over such impacts have delayed implementation of goods movement infrastructure projects perceived as capacity enhancing. *In order for this plan to garner the public support needed to succeed, it must demonstrably improve current unacceptable environmental conditions, both regionally and in locations affected by specific goods movement facilities.* Comments to assist in achieving these goals follow.

- 2. Defining a Vision for an Optimal Freight Transportation System: Additional Infrastructure Scenarios Should be Considered and Air Quality Analysis is Needed.** A key potential benefit of the Action Plan is that it can take a multi-jurisdictional perspective and define an optimal transportation system for the region as a whole. A key question presented is what infrastructure to include, particularly whether truck lanes, shuttle trains or “more of the same” freeway and rail corridors should be used to transport containers to and from the ports.

To help answer this question, the project consultant modeled and compared the hours of delay for vehicles and trucks considering nine scenarios (“bundles”) of truck lanes, one mixed flow toll expressways scenario, and one “Alternative Technology” rail scenario. The latter scenario involved use of a shuttle train (possibly maglev) to transport containers to a new “inland port” railyard in the high desert or other parts of San Bernardino County. (We will use the Action Plan’s term “Alternative Technology” in referring to this scenario, but we note that it could be implemented by traditional electrified rail, a well-established technology in many parts of the world, or, less desirably from an air quality perspective, by “Tier 4” diesel locomotives that EPA rules will mandate).

The Alternative Technology scenario analyzed in the Action Plan is based on an inland port with limited capacity -- a maximum of 5,400 containers per day -- about the capacity of the existing BNSF Hobart yard. This is but a small portion of the containers transported through the region every day. One reason for this limitation is that the Action Plan envisions this inland port as being limited to containers destined for locations *within* the region; those destined out of this region would not utilize the facility.

Under these circumstances, this Advanced Technology alternative showed worse performance than any of the truck lane scenarios in limiting hours of congestion delay. No comparison of air quality impacts and benefits of the scenarios was made. (Qualitative comparisons of Project Categories are made in Chapter 6, but they are

too general to be useful and are subject to misinterpretation¹). We have the following concerns:

- **Lack of Air Quality Analysis of Alternatives.** We acknowledge the importance of the congestion analysis, but for policymakers to be able to knowledgably decide what course of action to take, *we urge that the Action Plan also present an analysis of the air quality impacts and benefits of major alternative goods movement proposals, such as truck lanes and “Alternative Technology” rail alternatives, or a combination of the two.* From an air quality perspective, trucks and rail each have pros and cons, depending on the technology utilized, proximity to warehouses, proximity to pollutant receptors, and whether grade separations are constructed. The issue of whether to utilize truck lanes, rail shuttle, or a combination of the two, thus requires more thorough analysis, including air quality impacts and benefits.
- **Only One, Relatively Limited, Alternative Technology Configuration was Analyzed.** Transporting containers to and from the ports by clean, zero or near zero emission rail, has the potential to take trucks off the highways and reduce emissions. Moreover, it may be technologically, economically, and logistically more feasible to control emissions from locomotives than from trucks because fewer locomotives can move relatively large numbers of containers and because technologies such as rail electrification have been in use for decades, while electric trucks are just now being developed for limited types of service.

The draft Action Plan, however, only considers one, relatively limited, configuration for moving containers by clean rail. The analysis portrays that alternative as less beneficial than truck lanes in reducing hours of highway delay, but this is due to analysis that does not completely describe potential benefits. The key problem is that the analysis does *not* consider –

- a larger capacity inland port than one roughly equal to the existing Hobart yard (representing a small portion of all TEUs)
- the benefits of clustering the considerable amount of projected *new warehouse construction* (tripling by 2030) next to such an inland port,² or
- use of such a facility as an “agile port” to create destination trains for containers *bound outside of the region* which were quickly removed

¹ For example, it is said that the greatest PM emission reduction would result from alternative technologies (probably true) and the least reduction would result from improvements not enhancing capacity (may or may not be true depending on technologies used, current vehicle speeds, and other factors).

² The Action Plan does suggest such clustering (p. 7-6), but there is no quantitative analysis of the benefits of this strategy.

from the docks unsorted by destination using low emission rail (thereby eliminating truck drayage to near and off-dock yards).

The lack of quantitative analysis of such options imposed substantial and probably unnecessary limitations on the ability of this alternative to reduce truck traffic and congestion, as well as emissions and community impacts adjacent to near and off-dock yards.

We emphasize that AQMD is not in this letter taking a position regarding the desirability of any particular inland port, or of the concept of inland ports. Rather, we believe this concept holds sufficient promise to warrant considerably more thorough study. We note that, at a minimum, any inland port would have to be remote from residential and other receptors to avoid toxics impacts, unless it was fully electrified.

Analysis of “Alternative Technology” systems should be conducted which considers alternatives involving greater capacity, greater implementation of on-dock rail, and clustering new transload warehouse space near inland ports. More, specifically, the factors that should be evaluated are as follows:

- ***Proximity to Receptors.*** The analysis should also determine proximity to residential and school sites (as was done for all of the truck lane options) so this basic comparison can be made between truck lanes and rail.
- ***Rail Emissions Control Technologies and Electrification.*** The analysis should include consideration of the emissions expected from (1) use of locomotives meeting EPA’s proposed “Tier 4” emissions standards (e.g. 90% control of PM by 2015 model year), (2) emissions rates that could be achieved by accelerating to the year 2012 introduction of line haul locomotives meeting such standards (as assumed by SCAQMD and CARB in the State Implementation Plan, and (3) electrification of the existing rail system.

Regarding electrification, as was noted earlier, the AQMP contains a substantial black box of undefined control measures, and the current air plan does not include sufficient measures to attain the new 24-hour PM_{2.5} standard by the likely federal deadline of 2019. Electrification of the current rail system, potentially including a shuttle route to an inland port, is a strategy that should be evaluated as a means of further reducing emissions to meet the federal standards, as well as to address local toxics impacts from diesel particulates. The 2007 State Implementation Plan for the Basin calls for significant reductions from locomotives, equivalent to the accelerated deployment of 100% Tier 4 locomotives by 2014. While these reductions are substantial, system-wide rail electrification could achieve even higher reductions, as much

as 22 tons per day of NO_x, surpassing the overall long-term benefits of such a system over Tier 4 engines. *Given the level of emission reductions needed by 2015 and beyond, as well as climate change impacts of diesel use, our region has no choice but to seriously consider the reduction of emissions from diesel locomotives through electrification.*

Further, discussions between AQMD, SCAG and CARB leading to the development of the white paper identifying long term “black box” strategies to reduce 200 tons per day of NO_x and the upcoming 24-hour PM_{2.5} standards must be considered. Direction proposed in the white paper will undoubtedly include strategies that fully support zero and near zero emission systems.

We agree that where electrification is not feasible, that Tier 4 is the preferred strategy. However, we recommend that the project partners analyze zero emission technologies including anticipated costs, benefits, timelines, etc. for the electrification of the existing rail system.

We also support considering *phasing* such electrification, if needed to commence implementation. For example, a high-volume rail link that has already been built to accommodate rail electrification is the Alameda Corridor. Railyards near each end of the corridor have the highest and second highest railyard cancer risks found by CARB in the state. This link is thus an obvious candidate to begin a phased electrification of the rail system.

- ***Evaluation of Clustering Development of New Transloading and Warehousing Facilities Adjacent to Inland Ports Remote from Residential Areas.*** One key purpose of a comprehensive, multijurisdictional plan such as this should be to assist the region to develop a sensible distribution of goods movement-related facilities. Given the tremendous projected growth in international cargo imports, it is fair to assume that the recent growth in transloading and warehousing facilities will continue. The growing body of studies showing the health impacts of diesel particulates on persons living near transportation facilities counsel that the plan should consider and analyze the benefits of focusing such development in locations that will avoid concentrations of diesel emissions near residential areas. The plan should thus evaluate the feasibility and impacts of clustering development of new transloading and warehousing facilities adjacent to inland ports that are remote from residential areas.

Such a “more comprehensive approach” is briefly alluded to in Technical Memo 6b as having substantial potential benefits, but is not

elucidated other than to state that the advanced technology corridor could be a viable alternative if land-use polices were strengthened to encourage warehouse clustering near inland staging areas. (e.g. pages 2-29, 3-20). *Given the enormous projected increase in cargo, the limitations on in-basin railyard capacity, and the community impacts of siting railyards near residential areas, it is essential that this approach be further analyzed and considered.*

- ***Maximizing On-Dock Rail to Minimize Rail Operations Near Residential Areas; Evaluation of “Agile Port.”*** The current practice of draying significant numbers of containers by truck to “near-dock” and off-dock railyards where they are transferred to trains is inefficient, causes truck VMT and congestion, as well as local air quality impacts near residential areas. For example, the California Air Resources Board recently released risk assessments for several intermodal railyards that show significant cancer risks for thousands of persons, e.g. increases of approximately 700 in a million risk in some areas. For perspective, AQMD rules for stationary sources generally limit cancer risks to 25 in a million. To handle increasing cargo volume, new and expanded near-dock railyards have been proposed for locations close to residential areas that are already impacted by pollution from the ports. For example, an AQMD monitor at an elementary school just east of the proposed Southern California International Gateway railyard site has shown the highest elemental carbon levels (a surrogate for toxic diesel particulate) monitored in the region. The AQMD MATES III analysis showed this area to have some of the highest cancer risks in the region – well over the 1,200 in a million regionwide average. While some emission control programs are being implemented for railyards, *any use of diesel equipment in already impacted areas exacerbates unacceptable health risks.*

In order to minimize congestion and air quality impacts, the Action Plan should seek to eliminate drayage of containers by truck from the ports to railyards, or alternatively, to electrify all means of container transport.

We appreciate that the Action Plan states as a goal the reduction of reliance on trucks. However, we have not seen any indication that the Plan will seek to achieve this goal through means involving changes to rail operating practices. For example, one limitation on the Alternative Technology scenario is on-dock rail capacity. However, to our knowledge, there has not been any quantitative analysis by the ports or project partners of on-dock rail capacity that considers a key alternative: transporting *unsorted* containers out of the ports by rail to inland yards remote from residential areas. This procedure (sometimes titled an “agile port”) could potentially free up dock space currently

devoted to sorting destination trains, and allow more on-dock rail. The ports stated in the *San Pedro Bay Clean Air Action Plan* that they would evaluate the potential to ship unsorted containers by rail as a means of maximizing on-dock rail (Measure RL-3).

We thus urge the Action Plan to evaluate and incorporate every means of maximizing on-dock rail in order to reduce the reliance on near and off-dock railyards nearer to residential areas, unless all means of container transport are electrified.

It is only with such a full evaluation of alternatives that this Action Plan can fulfill its promise of providing policymakers with sufficient information to define an optimal transportation system for this region.

- 3. The Action Plan Needs to Include More Thorough Description of Mechanisms to Implement its Environmental Objectives; Approval of the Plan Should *Not* Include Approval of Specific Projects that Have Not Undergone all Environmental Reviews.** We commend the project partners for stating their support for agency environmental plans such as the AQMP and the San Pedro Bay Ports' Clean Air Action Plan. We also support the Action Plan's call for accelerated funding and implementation of control measures in such plans, strengthening of fuel and emissions standards, and project-specific mitigation. However, the Action Plan includes little detail regarding how these ends would be achieved. Indeed, much of the environmental mitigation portion of the plan is left to future development.

By contrast, the scores of infrastructure projects proposed in the plan are described with relative specificity. All described as being "essential." (p. 7-17). Some of those projects are highly controversial and subject to ongoing environmental review regarding (e.g. proposed "near-dock" railyard projects adjacent to residential areas north of the ports). We thus are concerned that the Action Plan -- including specific projects but largely undetermined mitigation -- is proposed to be "approved" by the agencies involved in its development. We appreciate that the project partners have responded to our workshop comments and have stated that "approval" of the plan will not include approval of specific projects. However, given the description of all projects as "essential," we urge that the scope of approval be made explicitly clear to the Boards that will be considering the Action Plan.

More fundamentally, however, the Action Plan needs to be augmented by specific mechanisms to implement its environmental goals. We would be pleased to work with the project partners to accomplish this. *Such mechanisms should seek to implement any control measures that have not been adopted as regulations or other enforceable instruments by international, federal or state agencies, ports or other governments.* Mechanisms to include are requirements to use clean trucks and locomotives as conditions of public funding, differential use fees for relatively high emitting equipment, coordinated advocacy by the project partners, air districts and stakeholders for more stringent federal emissions standards and for federal funding of

emission controls, conditions of port leases with marine terminal or railyard operators, etc.

- 4. Evaluation of Infrastructure and Emission Control Feasibility.** Because we want the Action Plan to be successful, we urge that any proposed infrastructure proposals include comparative analysis of implementation feasibility. For example, the truck lane and alternative rail proposals raise obvious issues of availability of right-of-way space. Decisionmakers should be able to compare problems in securing sufficient space for the truck lane and rail alternatives. Another example would be the issue of truck lanes versus shuttle trains. Decisionmakers should consider which transport mode could more readily be adapted to zero or near zero emissions technologies.
- 5. Other Comments: Aircraft Emissions.** On page 7-22, aircraft emissions are described as *not* being a significant source of pollutants compared to other mobile sources. We disagree. Aircraft will soon be in the top ten NO_x categories. Other categories in the top ten are relatively well controlled with the notable exceptions of locomotives and marine vessels. Aircraft emit quantities of NO_x comparable to locomotives and all sources in the “RECLAIM” program – the top 320 stationary sources of NO_x, including all refineries and power plants. The fact is that all source categories must be controlled if we are to achieve attainment, and there are virtually no source categories with quantities of emissions that predominate over all others.

Thank you for the opportunity to provide these comments. We look forward to providing further input in support of an effective and successful Action Plan.

Sincerely

A handwritten signature in blue ink, appearing to read "Peter Greenwald". The signature is fluid and cursive, with the first name "Peter" and last name "Greenwald" clearly distinguishable.

Peter Greenwald
Senior Policy Advisor

**MULTI-COUNTY GOODS MOVEMENT ACTION PLAN
DRAFT ACTION PLAN COMMENTS
COMMENTS BY GATEWAY CITIES COUNCIL OF GOVERNMENTS
FEBRUARY, 2008**

EXCERPTS

The following comments are provided on the draft action plan.

The draft plan states that the plan is “just a guide in preparation of plans.” However, from reviewing the draft plan many of the ideas for a framework are nebulous and lack specific steps for moving the plan forward. A more specific “next steps plan” is needed that includes community and perhaps equally important industry input. The draft plan also states that “communities are calling for slower growth (of the ports) and mitigation of existing impacts.” The second part of this statement is correct but GCCOG is commenting and performing its own evaluations to see if ultimate port growth can be accommodated by the local communities. Therefore, we would disagree with the first part of the previous statement.

The GCCOG can support the Implementation Principles listed on page 1-5. However, the input of the communities is vital and an accurate portrait of community impacts from any proposed facilities (such as impacts to sales tax base from any freeway widenings) should be an implementation principle. Another implementation principle should also include the active input and participation from the private sector and include an environmental principle stating that all projects or strategies be environmentally protective or mitigate existing environmental deficiencies be considered for as the number one Implementation Principle.

Page 2-3 includes the following statement – “Respondents also demonstrated support for dedicated truck lanes between the ports and the Inland Empire.” This is not the overall position of GCCOG. Dedicated truck lanes are an element of the I-710 Major Corridor Study hybrid design but this does not indicate a universal acceptance, particularly where the expansion of freeway ROW is required. On this page it is also stated that “majority of respondents felt an east-west corridor should be the focus of goods movement infrastructure improvement.” While generally supporting this statement, there needs to be a lot of input from GCCOG (and SGVCOG) in order to successfully address this issue. That has not been the case to date.

Railroad systems capacity limitations are not analyzed and a plan to implement those that are identified is not included in the plan. The railroad systems improvements should be analyzed collectively to determine if all of the needed improvements to various aspects for rail movement can be improved (and the impacts or results if they are not).

The plan does not address the impacts of reverse flow of goods (empty containers and exports).

In the future, data should be developed for daily volumes for 40' containers as that is the most useful for planning purposes. Also, the time of day these containers are moved (or relocated) should have been analyzed.

The draft action plan still does not address the locations for future warehousing/distribution centers (or a potential inland port). Without that information, the effectiveness of any "action plan" cannot be determined.

Air quality and emission reduction strategies are much more thoroughly addressed than in previous drafts. However, without a quantitative analysis of all the proposed air pollution reduction measures combined with an analysis of additional air pollution reduction measures, it is difficult to assess the impacts of these measures on the health of the nearby communities.

The plan does not address all the impacts of constructing truck lanes along various freeways.

Alternative technologies are not adequately addressed or evaluated in the plan. However, they are included as the "solution" for many of the implementation strategies. This dichotomy should have been addressed in the plan.

Table 21 from the plan is attached and shows changes or modifications recommended by GCCOG. In general shuttle trains should not have been listed with alternative technology. Shuttle trains have been dismissed by others (ACTA and SCAG) as being ineffective. The revisions or changes shown in Table 21 show the following:

- Alternative technology has much more benefits for the various categories.
- Mainline rail capacity improvements have many more benefits (as long as combined with all other railroad systems aspects needed to be improved along the mainline).
- Port hours and modifications of delivery hours have much more significant benefits than shown previously.
- ITS technologies (based on work being done by GCCOG) have the very real potential of much more benefits than shown in the original table.

Pages 6-11 to 6-18 – **Summary of Qualitative Evaluation** – Attached are the referenced pages on which GCCOG has shown our comments in red. In general some of the conclusions with respect to the "most" benefit overlook the inter-dependency of the goods movement industry and the benefits of other aspects of goods movement – most notably the use of alternative technologies, improved railroad systems improvements, port hours of operations, efficiencies and ITS. The changes shown on the attached pages reflect the previous comments by GCCOG and the changes suggested in Table 21. The specific comments for use of the evaluation categories are shown on the attached pages.

Page 7-9 – Table 24 – Example Actions Targeted by Market Segment – This table is included with changes or comments by GCCOG that reflect our previous comments.

Page 7-19 lists the time frames to implement the strategies and covers a period of over 25 years to implement. This is entirely too long, particularly for environmental mitigations and if the ports continue to grow. The ports are projected to double within the next ten years and that should be the longest period to implement