

November 22, 2005

Hon. Sunne Wright McPeak  
Secretary  
Business, Transportation & Housing Agency  
980 9<sup>th</sup> St., Suite 2450  
Sacramento, CA 95814

Dr. Alan Lloyd  
Secretary  
Environmental Protection Agency  
1001 I St.  
Sacramento, CA 95814

**RE: Governor's Goods Movement Action Plan**

Dear Secretaries McPeak and Lloyd:

On behalf of the California Association of Port Authorities (CAPA), we appreciate the opportunity to submit these comments regarding the Governor's Goods Movement Action Plan (GMAP), and discussions facilitated during the Working Group meetings. CAPA is comprised of the state's eleven, publicly-owned, commercial deep water ports.

We agree with your observation that a lack of state and federal investment in our transportation infrastructure will ultimately limit international trade, reduce employment opportunities, and undermine California's competitive strength. With that said, we have the following recommendations and principles we urge you and your staff to consider when drafting the final Goods Movement report:

1) **Utilize All Statewide Assets, Big and Small.** We believe a commitment to employ all underutilized port assets throughout the State is critical to the state's long-term Goods Movement strategy. Such an approach will improve efficiency and reliability of the state's overall goods movement infrastructure, assist small ports, and buy time for the massive infrastructure improvements necessary at California's larger ports.

2) **Prevent Encroachments On Port, and Goods Movement-Related Land.** Incompatible land uses near and/or adjacent to port property are not beneficial for either the community or the goods movement industry. We believe transitional areas, or buffer zones, between industrial and residential zones should be established.

3) **Cost Share.** CAPA encourages the state to develop a cost-share program for matching a portion of the required local cost share of a federally authorized navigation study or construction project including shoreline protection, channel deepening, and other such projects.

4) **One Size Does Not Fit All.** Every port has unique needs and interests. We urge you to consider our Association's diverse membership and needs. While a statewide perspective is necessary, one must factor the differences which exist from port to port, such as varying cargo types, hours of operations, and of course, port size.

5) **Review Funding Opportunities Available Via the California Maritime Infrastructure Bank and Authority.** While we are all aware that funding sources are limited, we urge the state to review all current funding sources already in place, such as the California Maritime Bank and Authority. The Bank was formed at the request of the California Marine Affairs and Navigation Conference (CMANC) and codified as Sections 6516.5 and 6571 of the Government Code and Part 1 (commencing with Section 1690) of Division 6 of the Harbors and Navigation Code of the State of California.

The Authority can issue debt, establish and administer infrastructure funds, receive or administer public and private grants, and expend tax revenues, appropriated funds, and other financings on behalf of its member Districts.

6) **Ensure Equitable Distribution Of Identified Funds.** While we are aware that California is a large state of competing needs, we urge an equitable allotment of infrastructure projects for both the Northern and Southern regions. Again, a statewide perspective is integral to finalizing the "short list" of infrastructure projects you and your staff have compiled.

Again, we urge your very careful and thoughtful deliberations when finalizing a statewide goods movement strategy. Thank you for the time and attention to this matter; we would be happy to discuss any of these principles with you and your staff, at your convenience.

Sincerely,

Jim Lites  
California Association of Port Authorities