THE AIR DISTRICTS OF THE SACRAMENTO REGION

December 15, 2005

Catherine Witherspoon
Executive Officer
Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Witherspoon,

The Air Districts of the Sacramento region are pleased to submit these early comments on the state's Emission Reduction Plan for Ports and International Goods Movement in California. We understand that this document will feed into the larger Goods Movement Action Plan and comprise much of the mitigation for the tremendous increase in goods movement and the related emissions we anticipate in the next 20 years. We commend the Air Resources Board staff for their herculean effort in putting together this comprehensive document, particularly in the short timeframe in which they've had to work.

The larger Goods Movement Action Plan appears to be focused primarily on Southern California, with some attention paid to the Bay Area. The Sacramento region serves as a major crossroads for goods movement for the North American continent. Interstate 80 is a primary east-west transportation corridor and Interstate 5 and Highway 99 serve as critical north-south passageways for the movement of on-road goods. In addition the region includes the Roseville Rail Yard, which is one of the largest railroad switching yards west of the Mississippi and serves as a major portal for both east-west and north-south rail traffic, as well as the Port of Sacramento, Sacramento International Airport and Mather Cargo Airport. Increases in the volume of goods moved through the Pacific Rim ports will necessarily have downstream transportation and air quality impacts on the Sacramento region.

It is critical that the needs of the state's regions are considered as we move forward together to attempt to accommodate the anticipated increased volume of freight while improving the quality of life for all Californians that we must address the needs of all the state's regions. In order to better assist our region we ask that Cal EPA and ARB:

- Develop a comprehensive (all modes) 2001 baseline inventory to track and mitigate emissions from international goods movement in the Sacramento region. This baseline is critical to meet the short-term goal of reducing 2010 emission levels to no greater than 2001 levels.

- Form a comprehensive working group, including all stakeholders at the local and regional level, in planning efforts to implement in specific form the principles of the Goods Movement Action Plan. In particular this approach is critical to meet Principle 1: *Approach infrastructure and mitigation actions on a simultaneous and continuous improvement basis. Approach funding and implementation for infrastructure mitigation on a simultaneous basis.*

- Ensure that port expansion projects in upstream/upwind areas mitigate induced downstream/downwind impacts.

- Ensure that ARB's enforcement efforts include compliance by all heavy-duty trucks with low NOx software upgrade regulations.

- Tie funding for mitigation of emissions related to international goods movement to new revenue sources related to those activities.

- Assist local land use decision makers by developing information and modeling tools to further implement ARB's 2005 Land Use Handbook as one way to ensure implementation of Principle 15: *Consider land use implications in goods movement decisions. Consider goods movement implications in land use decisions.* Good land use decisions will be critical in meeting both goods movement, environmental and quality of life goals. Local officials need adequate, specific tools to apply the Handbook recommendations.

We also recommend that the Goods Movement team expand its scope as soon as practicable to include domestic goods movement increases in addition to the international goods movement, which is the present focus of the Plan.

As a major crossroads for international and domestic goods movement the Sacramento region is ready to work with all stakeholders to minimize the negative impacts from the huge increase in anticipated activity while ensuring an improved quality of life for its citizens. We look forward to further discussions on implementing ARB's Emission Reduction Plan.

Sincerely,

Marcella McTaggart, APCO
El Dorado County AQMD

Dave Valler, APCO
Feather River AQMD

Tom Christofk, APCO
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Larry Greene, APCO
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