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SACOG

SACRAMENTO METROPOLITAN
AIR QUALITY
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December 15, 2005

RECEIVED
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AIR RESOURCES BOARD
EXECUTIVE OFFICE

The Honorable Sunne Wright McPeak
Agency Secretary, Business, Transportation and Housing
908 8th Street, Suite 2450
Sacramento, CA 95814

Dear Ms. McPeak:

The Sacramento Area Council of Governments and the Air Districts of the Sacramento region are pleased to submit 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 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. We would like to take this opportunity to emphasize the importance of our region in the movement of goods.

The larger Goods Movement Action Plan appears to be focused primarily on Southern California, with some attention paid to the Bay Area. However, the Sacramento region serves as a major crossroads for goods movement for the entire North American continent: Interstate 80 is a primary east-west transportation corridor and Interstate 5 and State Route 99 serve as critical north-south passageways for the movement of goods. In addition, the region includes several other important goods movement facilities, such as the Roseville Rail Yard, the Port of Sacramento, Sacramento International Airport, and Mather Cargo Airport. The Sacramento region is already a non-attainment area for air quality, and projected future 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.

While many transportation projects have been identified in other parts of the state as critical to improving the movement of goods, Sacramento has only begun to consider and develop specific "additional improvements necessary" to move goods to and through the Sacramento area. At least the following projects, and perhaps others yet to be identified, will be critical to the region in the years ahead:

- Specified lanes on I-5 to handle trucks through downtown Sacramento
- Additional truck stop and layover facilities (only one is currently in operation) near I-5/I-80 junction
- Reinforced pavement on certain high-truck-volume arterials
- Direct ramps from I-80 into the Port of Sacramento

- Track improvements in the Roseville rail yard and east from the Roseville rail yard
- Third main line rail track between downtown Sacramento and Roseville
- Track improvements through downtown Sacramento station area (intermodal)
- Relocated freight rail lines to serve the Port of Sacramento
- Local matching funds for dredging the ship channel to the Port of Sacramento
- Container cranes and roll-on/roll-off barge ramps for the Port of Sacramento
- More adequate funding for maintenance and rehabilitation of rural farm-to-market, mining, and logging roads

Although none of these project concepts are fully developed, they are all currently in the process of being studied and evaluated. Almost all can be achieved for modest or medium-range costs. A more refined list is expected to come out of SACOG's planned regional goods movement study and resulting action plan.

It is critical that the needs of all 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. In order to better assist our region, we ask that Cal EPA and ARB:

- Recognize the Sacramento region as a separate and distinct region from the Bay Area and the Central Valley Region for both transportation and air quality. With an expected 50% increase in population over the next twenty years, the Sacramento region will be challenged to continue to meet goods movement needs, both for goods produced or consumed in the region and for goods moved through the region, with projected future growth. While goods movement activities from the Central Valley and the Bay Area intersect in Sacramento, this region has its own unique set of needs, challenges and opportunities in this area.

- Address the importance of goods movement via air cargo for goods produced in California and shipped elsewhere, whether nationally or internationally.

- Ensure that the full range of potential impacts on communities from goods movement – noise, traffic, safety & security, parking, and air quality – is addressed.

- Look at a possibly expanded role for the Port of Sacramento related to proposed joint operations with the Port of Oakland.

- Understand that improved and expanded rail facilities are needed to meet the needs of goods movement into, out of and through the state, as well as for improved passenger rail service, particularly if there is an expectation that some share of goods now moved by truck can be shifted to rail.

- Develop a comprehensive (all modes) 2001 baseline 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 and airport expansion projects in upstream/upwind areas mitigate induced downstream/downwind air quality impacts, covering both emissions from vessels and aircraft as well as from ground operations.

- 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 goods movement, environmental, and quality of life goals. Local officials need adequate, specific tools to apply the Handbook recommendations.

As a major crossroads for international 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,

Mike McKeever
Executive Director
Sacramento Area Council of Governments

Larry Greene, APCO
Sacramento Metropolitan
Air Quality Management District

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cc: Catherine Witherspoon, ARB
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