

**From:** Moss Bittner  
**Sent:** Tuesday, January 10, 2006 10:04 PM  
**To:** Gwen Strivers  
**Subject:** comments on GMP phase II draft

To the staff of BHT & CalEPA:

I write these comments as a member of the Humboldt Bay Rail and Port Infrastructure Taskforce (RAPIT), a citizens group that advocates for the modernization of the Port of Humboldt Bay and its full inclusion in the California goods movement system. We have followed the progress of the goods movement plan, and at times have been encouraged by the movement towards a broader approach to solving the state's freight congestion crisis.

We do not find that the current draft adequately addresses the need to expand the state's goods movement system to fully utilize smaller ports. It has been made clear by Jim Spinoza of the ILWU and others at GMP working groups that the state's small ports could add significant capacity to the system if adequate investment were directed toward their terminal facilities and connecting roads and railroads. In addition, the small ports could add capacity with modest investment.

The issue of capitalizing small ports ought to be addressed in the Framework as a specific issue. The inclusion of "evaluate short sea shipping" among the immediate actions to be taken by the state is encouraging -- small ports, such as Stockton, Sacramento, and Humboldt that will gain from the development of SSS, while the larger ports will be able to reduce the truck traffic on their connecting arteries by sending significant volumes out on barges.

If the issue of investing in small ports is not addressed in the Framework, it will make it especially difficult for small ports and their host communities to secure the funding that will be necessary for them to participate in the freight market in a meaningful way. It may be beneficial to sponsor a state-wide evaluation of the potential of small ports and their investment needs. This will help the small ports stay on the radar in state-wide funding cycles, and it will help the large ports by identifying available capacity at a time when they are clearly unable to soak up all of the growth in freight coming from Asia.

It is very disappointing for us to find that no specific recommendations that would help improve the Port of Humboldt were included in the draft. Our group, and, we feel, our community, would like to see specific projects of benefit to the North Coast mentioned in the Framework. Necessary projects include the restoration of the North Coast Railroad (currently owned by the state of California); the construction of a waste water treatment facility on the Samoa peninsula to serve terminal operations, ships and industrial users (this project has been mentioned in reports including CALMITSAC's "California Marine Transportation Infrastructure Needs" of March 2003); and modernization of the Redwood Dock, a facility owned by the Humboldt Bay Harbor District, also mentioned in the CALMITSAC report and in other planning documents.

Inclusion of the North Coast Railroad in the GMP Framework is especially important because the state has already authorized \$42 million in funding for the NCRA through TCRP legislation. Including the NCRA in the Framework is a necessary step to overcoming the resistance of civil servants at CTC and Caltrans who have, in their oversight capacity, refused to release the funding. This unfortunate state of affairs has seriously hampered the ability of the Port of Humboldt to attract shippers, but it is an entirely correctable situation if the state reaffirms its commitment to the NCRA by including it among the many projects in the Framework. Please note that this does not require that the state make a new commitment, simply that it follow through on one that was made some years ago.

Thank you for your consideration,

Moss Bittner

Co-ordinator, Humboldt Bay Rail and Port Infrastructure Taskforce