Alameda Corridor-East Construction Authority

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February 28, 2006

Secretary Alan Lloyd
California Environmental Protection & Housing Agency
State of California
1001 "I" Street
Sacramento, CA 95814

Ms. Catherine Witherspoon
Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Comments on Emission Reduction Plan for Ports and International Goods Movement

Dear Secretary Lloyd and Ms. Witherspoon:

Thank you for the opportunity to comment on the Emission Reduction Plan. The Plan does an excellent job of documenting the challenges facing California and actions necessary to preserve the State's premier standing as the nation's trade capital and at the same time reducing pollution associated with goods movement.

We applaud your leadership to establish four specific goals for air pollution emission reduction. Implementation of the plan is dependent on strategies outlined in Table 3 (page ES-7). We support your target goals and strategies; however we believe the overwhelming focus on environmental mitigation for the general vicinity of the Ports and the relative lack of attention to other areas affected by trade growth is short sighted. The need (and opportunity) to mitigate existing conditions on the rail corridors east of downtown Los Angeles should be reflected in Table 3.

It is frequently asserted that shifting more container traffic from truck to rail would be environmentally beneficial. This perception largely exists because the Alameda Corridor provides an efficient, environmentally friendly means to move the freight in and out of the Ports and through the adjacent communities. Two and one-half billion dollars was spent to provide a fully grade separated route, with more than half of it depressed below grade, so that the impacts of rail freight movements would be minimized. At its northern terminus, 90% of the train traffic continues east where nothing was done to accommodate it. To make matters worse, more trains are built up in the yards to the north with containers trucked up from the Ports and sent out in the eastbound rail lines. Today in the San Gabriel Valley alone we have as many as 70-90 trains a day on one corridor as compared to the 40-50 a day using the Alameda Corridor.

To suggest that this isn't an environmental impact worthy of mitigation today, let alone in the future, treats the millions of residents east of Los Angeles like second-class citizens.

The ACE Construction Authority has determined through independent study that idling trucks/ autos at blocked grade crossings (currently for 20-30 minutes at some crossings) significantly contribute to air pollution for our residents. Further, experts have documented that idling trucks and autos will increase 300% in our communities by 2020. We have paid for independent study by air quality modeling experts and have determined we can eliminate 221 tons of air pollutants a year for 20 grade separations along 70 miles of mainline freight track by 2020. San Gabriel Valley cities have unanimously adopted the ACE Project as a way to mitigate the environmental impacts of goods movement on adjacent residents, communities and businesses. Our cities have been working together on this delicate balance for the last ten years when we became aware of the pollution and noise impacts to our residents and businesses by blocked crossings.

Expanding those air quality emission reductions to the other at-grade crossings along the four-county ACE Project (includes 139 crossings covering 282 miles of mainline freight) would significantly contribute to air pollution emission reduction targets identified in your plan.

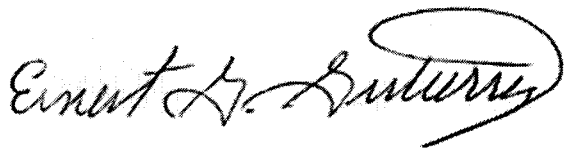
The ACE Project has been categorized in the list of recommended infrastructure and operations projects in the State Goods Movement Action Plan. We strongly believe the ACE Project easily qualifies for the public health and environmental impact mitigation category of the Plan. However, we are concerned that if Table 3 of the Air Emission Reduction Plan does not include grade separations as a strategy, there could be an interpretation that these types of community and environmental mitigation grade separation projects are not a priority in the plan.

The 31 cities of San Gabriel Valley are working together to balance the quality of life for our two million residents, and maintain economic vitality for our business communities. The ACE Project is supported on a bi-partisan basis by the Valley's 14 state legislators and five Congressional members for these reasons. The project is also supported by the San Gabriel Valley Economic Partnership as a key transportation infrastructure improvement necessary to ensure the delivery of goods and services to local businesses.

In conclusion, we support your Air Emission Reduction Plan with the amendment noted above and look forward to working with your staff in implementing it. We would like to thank staff of CalEPA for their tireless efforts to bring consensus to a complicated subject and identifying practical solutions for air pollution emission reduction in this area. Thank you for your leadership and energy in undertaking this important effort that affects the quality of life for our cities, residents, and businesses. Please feel free to contact Rick Richmond, Chief Executive Officer at

(626) 962-9292 should you have any questions or comments.

Sincerely,



Ernest Gutierrez
Chairman, ACE Construction Authority
Mayor, City of El Monte

cc: Barry Sedlik, Deputy Secretary BT & H
Barry Wallerstein, SCAQMD