

Port of Los Angeles Comments
Goods Movement Action Plan Phase II Progress Report:
Draft Framework for Action, February 2006
3/13/06

1. Consider previous comments, dated January 18th, made in response to the December 2005 draft report (note that those comments refer to specific page numbers contained in the December draft).

Also, consider comments dated, February 28th, addressed to Ms. Sylvia Oey, California Air Resources Board, on the draft Emission Reduction Plan for Ports and International Goods Movement in California.

2. For consistency, the final Goods Movement Action Plan (GMAP) should be coordinated with the CALMITSAC Interim Report, "Growth of California Ports: Opportunities and Challenges."
3. The draft GMAP contains a series of proposed "criteria for selection of infrastructure projects and operational improvements" as well as "metrics" for the same process. At this point, the draft has not addressed how either the individual criteria or metric would be implemented or applied. The lack of an implementation process or framework, possess a challenge to assess the practical application of the criteria or metric, on an individual basis or collective efficiency. While there is a statement on page IV-1, indicating the table of "Preliminary Candidate Actions" was produced as "...result of the quantitative process..." it unclear how the criteria and metrics would be applied to other high priority goods movement projects.
4. The list of "Preliminary Candidate Actions" is a good starting point and should be expanded to include additional items and responsible parties for implementation. In a related context, the GMAP should address the anticipated or proposed process, which will be used to include additional critical port access and goods movement, related projects as part of a statewide goods movement system.
5. The Governor's "Go-California" program addresses the need for implementing accelerated project delivery mechanisms, i.e., design-build, in order to make sure critical projects are implemented on an expedited basis. It would appear appropriate to include the range of accelerated project delivery mechanisms in Section V of the GMAP, which addresses the goal of Accountability."
6. With regards to funding, Section VI, we strongly urge that the GMAP make every attempt to link priority candidate projects with candidate funding sources. In order for the funding discussion contained in the GMAP to have strong credibility, there should be funding targets or assumptions. This is particularly true with regards to federal funding. While the SAFETEA-LU, was recently enacted by Congress, it is not too soon to begin discussions about such legislative objectives as a dedicated federal source of funds for goods movement related projects. In fact the Congress has established a National Commission to explore new federal transportation funding approaches. There should be a coordinated effort to influence the recommendations contained in the Commission's report to Congress supporting a high level of federal investment in goods movement

projects and environmental mitigations programs. Another area of focus, in terms of the State securing a fair share of federal funds for goods movement related projects, and port related environmental mitigation, and port security, is the concept of “carve-out” of federal Custom Revenues. A united front is required to secure an increment of growth in future Custom Revenues from Congress for use by California port authorities and the State.

7. Potential implications to the GMAP should be identified relating to provisions contained in the Draft National Freight Policy recently released by the U.S. Department of Transportation. As documented by the GMAP and other authoritative studies and analysis, federal policies have a direct, and in some cases, negative impacts on California’s logistics system and communities surrounding global gateway facilities, i.e. ports, airports, and intermodal facilities. The GMAP is an appropriate policy vehicle to assess the Draft US DOT policy document.
8. While the Plan appears to address all impact areas (i.e. public health, jobs, public safety, infrastructure...) independently with equal importance, it should also address priorities. Many times, all areas may not be dealt with equally and costs and benefits may be weighed against each other in the ultimate decision. The plan should include some general provisions of what should be done in a variety of situations. For example, a large new project could lead to more jobs but even with environmental provisions, may result in net pollution increases. The State's priority in this situation and what balance is acceptable should be identified.
9. Page I-4: Replace/Improve the Vincent Thomas Bridge should be added under Long Term Actions.
10. Page II-3: No Net Increase: The Port of Los Angeles is no longer pursuing the No Net Increase (NNI) plan. While the overall goal of NNI, reducing air emissions, is still valid, the Port is developing a more comprehensive “Clean Air Plan.”
11. Page IV-3: Clarify "Spread out vessels sailing and arrivals in the transpacific trade." As written, this action sounds like ships should be spread out among the Ports, not that calls to an individual Port should be spread out over the week.