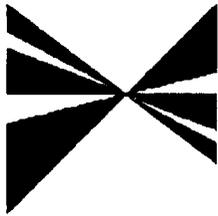


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February 28, 2006

Ms. Sylvia Oey
 Manager, Southern California Liaison Section
 California Air Resources Board
 1001 I Street, 7th Floor
 Sacramento, CA 95814

RE: Emission Reduction Plan for Ports and International Goods
 Movement in California

Dear Ms. Oey,

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the Air Resources Board (ARB) Emission Reduction Plan for Ports and International Goods Movement in California ("Emission Reduction Plan"). As a recognized stakeholder and work group member for the broader Goods Movement Action Plan being jointly carried out by the California Environmental Protection Agency (Cal/EPA) and the Business, Transportation & Housing Agency (BT&H), SCAG understands that the Emission Reduction Plan is part of this broader effort.

Fitting with ARB's expertise and authorities, the Emission Reduction Plan is weighted heavily towards technological, equipment-based mitigation strategies. However, while technological-based control of engine emissions from the equipment associated with the goods movement industry is a key method of reducing public exposure to harmful air pollution, the Emission Reduction Plan will be more effective if it is a comprehensive strategy, as envisioned by the broader Goods Movement Action Plan, and includes more than a brief reference to improved land use decisions.

While recognizing the longstanding authority of local governments, land use decisions which consider the effectiveness of the overall transportation network for goods movement in combination with community impacts and mitigation are necessary components of a comprehensive emission reduction strategy. Improved planning processes that include performance standards and a comprehensive land use component (e.g., SCAG's Compass 2% Strategy) will provide additional and necessary reductions in public exposure to emissions associated with the goods movement beyond those resulting from technological improvements to equipment.

Therefore, the integration of enhanced land use decision-making processes that link environmental and community mitigation with infrastructure projects into the Emissions Reduction Plan is warranted. The

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implementation mechanisms and process enhancements outlined in the *Community Impact Mitigation and Workforce Development Actions/Criteria/Metrics* ("Reducing Community Impacts and Achieving Workforce Development") documented by the Integrating Work Group should be fully developed and included as part of the Emission Reduction Plan.

The Emission Reduction Plan will also be more effective if it is a comprehensive strategy that controls emissions from goods movement related to domestic trade as well as from international trade.

SCAG staff looks forward to continuing our work with you and other stakeholders in facilitating development of appropriate land use and other relevant strategies to help address the problems and opportunities associated with the goods movement industry in California.

Please feel free to contact me at (213) 236 1808, or Mr. Jonathan Nadler, Senior Regional Planner, at (213) 236-1884 to discuss these comments.

Sincerely,

A handwritten signature in black ink that reads "Ho-NUNto for Mark A. Pisano". The signature is written in a cursive, somewhat stylized font.

Mark A. Pisano
Executive Director