

Attachment B – GMSP Public Comments and Support Letters
Organizations

Organization	Comment #	Specific to the Plan or Early Action Initiatives	Comments Received
California Transportation Commission (CTC)	1	The Plan	Fix the misalignment in Figure 3 on page 11.
	2	The Plan	What are some of the financial and environmental challenges of building “near dock” facilities?
	3	The Plan	How feasible/helpful would it be to offer free transit to logistics workers to help solve the job access/housing issue?
	4	Southern California Rail Investment Initiative	Are there additional strategies that are part of Initiative 3 the Southern CA Rail Investment Partnership that are still being developed?
Pacific Merchant Shipping Association (PMSA)	5	The Plan	When the document discusses mitigating the impacts from port-related freight, it should acknowledge that the ports lead the world and have in place policies that exceed California’s own goals for having reduced and continuing to reduce freight-related impacts.
	6	The Plan	Competitiveness and mitigation are discussed separately. At some point, the two issues should be brought together. Cost-effectiveness is the key metric to ensure you are reducing impacts and retaining competitiveness.
	7	The Plan	Total costs must be considered in the context of competitiveness, including mitigation. As a result, it is important that measures that reduce cost are considered within the plan. For example, having multiple disparate and potentially contradictory impact mitigation strategies in the County/State will substantially increase costs and not necessarily meaningful emissions.
	8	The Plan	It should be stated that proposed mitigation plans must consider what emission or impact reduction they provide (in both amount and duration) in excess of existing and proposed rules. Otherwise, the same emission reductions could be “purchased” twice.
	9	LA Metro Countywide Clean Truck Initiative	Strategy 2.4a: should be revised to state: Coordinate and ensure consistency with other established programs.
	10	LA Metro Countywide Clean Truck Initiative	Add Strategy 2.4g: Develop program requirements that maximize emission reductions, minimize costs, and ensure emission reductions are real, surplus, quantifiable, and permanent.
	11	LA Metro Countywide Clean Truck Initiative	Strategy 2.4h: The program should include coordination with surrounding regional planning agencies to ensure that bottlenecks improved here do not become bottlenecks in Riverside, San Bernardino, or Orange Counties.
	121	The Plan	I wanted to note that I loved all the anecdotes about local businesses that rely on the ports. In that vein, I wanted to draw your attention to Figure 7 in the attached POLB Economic Impact Report. The figure shows the beneficiaries of exporters through the Port of Long Beach. Unsurprisingly, the areas that most light up in the figure are all in California. It’s another example of how our local businesses are dependent on a healthy goods movement system to remain competitive that you may want to consider referencing.

Coalition for America's Gateways and Trade Corridors (CAGTC)	13	The Plan	Summary of Our Challenges: that caught my eye: "Goods movement has previously been treated in ways that are either in alignment/misalignment with other Metro goals and priorities." I may have missed it, but I couldn't find a detailed explanatory paragraph or section explicitly addressing that. Is it implying Metro's first priority has historically been passenger mobility, which can at times be in misalignment with freight mobility?
Coalition for America's Gateways and Trade Corridors (CAGTC)	14	The Plan	Also, Figure 16 looks incorrect to me. I don't think any of requests are in the trillions and I am having a difficult time reconciling the numbers. Its also a bit confusing because the title of the figure is "California Project Funding Gaps" but I assume that the INFRA and BUILD charts are looking at overall funding gaps and not just the California applications?
Caltrans District 7	15	The Plan	I suggest that the agency look for global solutions more critically. For many years, France has had a system where large (18 wheelers, tankers, and extremely large) trucks have restrictions on times and days where they are not allowed to share the road with passenger cars and trucks. Since COVID, traffic has declined, but with so much road work on our freeways, sharing the roads is still a challenge to many. The discontinuation of Driver Ed programs in the high schools has not helped. Truck rest areas MUST be established strategically for safety reasons, especially for long distance drivers. Auto-pilot systems in trucks and trains need strong oversight. Without these kinds of considerations, I fear the increase in negative impacts to our environment and the humans who interact with commercial transport will not be beneficial to either.
	16	The Plan	Existing wording suggests labor disputes are on-going or at least pervasive. Consider presenting labor aspect in a larger context.
	17	The Plan	Suggest adding a year for each of the stats presented. Will a source be identified for each of these stats (either as a footnote or as part of narrative elsewhere in this document)?
	18	The Plan	Figure 3: As a general comment, some of the information under Plans and Funding Programs does not seem to be placed on the row associated with the most applicable agency. Some plans, such as the California Sustainable Freight Action Plan, are multi-agency effort. As a suggestion, footnotes could be added for each of the column headings, explaining the context of the information provided under the respective headings and the information could be organized accordingly. It is suggested that this table not be constrained to a single information item under the Plans and Funding Programs headings.
	19	The Plan	Do all these employees live in LA County, or is the \$44 million in labor income to employees who worked--just in LA County, but did not necessarily reside in LA County?
	20	The Plan	At the outset it is stated that \$166 billion in taxable sales transactions occurred. It is subsequently stated that the retail and food service sectors contribute to sales tax revenue tremendously, generating \$11.6 billion in sales taxes. There is no comparative information to illustrate how substantial a percentage the \$11.6 billion is.
	21	The Plan	Linking Farmer and Consumer: If possible, it would be helpful to the larger narrative, if the data reference could be 2018 as it would help to further contextualize the macro data identified in Figure 7.

	22	The Plan	Supplying an Island Getaway: As the Catalina Island particulars identified in this regard are quite unique, it is suggested that if feasible and possible, another geographical/community example be added, with different population demographics.
	23	The Plan	Responding to a Global Pandemic: Because the economic impacts attributable to the COVID 19 pandemic have been so dynamic it is recommended that any/all data included in that regard be as contextually specific as possible. For example, if the decrease referenced above is specific to the month of February that should be clearly indicated, as the ports have been doing much better the last couple of months.
	24	The Plan	In the specific context of this sentence it is not clear how, "...greater equity for LA County." ties in.
	25	The Plan	Recommend including some brief data about what WIN-LA has accomplished. Separately, as a suggestion--if this paragraph is not already organized this way, that the information be provided in some particular order—either chronologically or based on the number of people the respective programs serve.
	26	The Plan	Is the reference to trucks in the second sentence, all classes of trucks or just HD trucks? Recommend including this clarification as medium and light duty trucks are not necessarily diesel powered.
	27	The Plan	The document understood to be referenced in footnote 29, SCAG's 2012 Comprehensive Regional Goods Movement Plan and Implementation Strategy, "On The Move-Southern California Delivers The Goods," states on page 31: "Truck congestion in urban areas within the SCAG region resulted in approximately \$2.6 billion in costs due to wasted labor hours and fuel in 2010." As the earlier part of this paragraph references information in the context of 2018, it is recommended that if this information from SCAG's 2012 document is going to be included that the entire sentence be utilized.
	28	The Plan	Recommend revising this sentence. Trade tariffs have been impacting the ports for approximately two years, but COVID only goes back the last 6 months and as noted above, the impacts of COVID have notably lessened (in terms of port volume activity the last couple of months). Also, the ports have been losing market share to other ports for many years.
	29	The Plan	Link below provides access to monthly data updates, including air cargo. Most of the 2020 to 2019 year over year comparisons, by individual months, were decreases in 2020 until the month of May this year. In comparing year to date (January to February, January to March, etc.) between 2020 and 2019, 2020 is less than 2019 in every monthly report, though July's is close to even. Is there a separate source that indicates that air cargo volumes have increased at LAX specifically due to COVID (was that increase possibly specific to transport of medical supplies)?
	30	The Plan	As this plan is specific to LA County it is suggested that this sentence be revised to state, "...key trade corridors and arterials located in Los Angeles County that already...."

	31	The Plan	Summary of Our Challenges, first item: Depending on what was intended to be highlighted with this first challenge, it is possible that the third challenge fully captures it, and the content of the third language is more direct. Aligning with Metro's goals and policies would be thought to be a benefit rather than a challenge. Suggest revising "All of these challenges..." to "All of the above challenges, separately and combined, undermine...."
	32	The Plan	Freeways: It is suggested that the following, all excerpted from SCAG's 2020RTP/SCS Goods Movement Technical Report (page 47), be incorporated into the discussion provided under Freeways Subject heading: With continued growth in freight demand, regional truck-related activities will increase over Connect SoCal's horizon. SCAG's Heavy-Duty Truck (HDT) model is the primary analysis tool used to evaluate the impacts of truck traffic and highway goods movement strategies on the regional transportation network.
	33	The Plan	Ports, last sentence: Although the assertion in the last sentence that there are financial and environmental challenges associated with building "near dock facilities," is likely well enough understood generally—as is—to not require further elaboration, the lack of information regarding any other way(s) that capacity pressures at port facilities might be relieved, suggests that it is the only way.
	34	The Plan	Rail, first sentence: Given the extraordinary impacts of the pandemic on usage of mass transit, is the 2025 increase in passenger usage of Metrolink still considered applicable?
	35	The Plan	Streets, second sentence: Is it possible the pandemic has already altered the identified doubling timeline?
	36	The Plan	Losing National Market Share, third paragraph: There may be some range of perspectives on what POLA and POLB have identified in their respective Master Plans (and other plans), but it seems like they both enjoy substantial support and it would seem fair to observe that both ports have visions of handling more cargo than they handle now.
	37	The Plan	Evolving Workforce Needs, first paragraph: Picker and Packers (also known as Pick Packers) usually work in retail, logistics, wholesale or manufacturing warehouses and distribution centers. 'Pick' refers to choosing and picking up the items on the order form or 'picking slip', while 'pack' refers to packing the order and getting it ready for transportation. As a picker packer, you use a computer or scanner to check inventory and locate items. In considering the above description of a pick-packer, it might not be an example of a skill set that is unrelated to automation.
	38	The Plan	Air Quality Challenges and Implications, third paragraph: The first paragraph on this page identifies, ships, trucks, and trains. Is it possible to identify ships' contribution to NOx emissions? Perhaps consider replacing "are no easy tasks" with "are tasks that will require substantial reductions in criteria pollutants."
	39	The Plan	Congestion at the Curb: Although there continues to be buzz about autonomous vehicles and drones, the timeframe for when either technology will play a prominent role in freight movement seems to still be, at best, uncertain. The increasing traffic associated with urban freight delivery is already a transportation issue. Regarding the last

			sentence in this paragraph, if feasible (and possible), it is suggested to consider including some reference to recent efforts on this subject that have been worked on by SCAG and by New York City DOT.
40	The Plan		Economic Disparities, first paragraph: The second sentence states, "The goods movement sector creates well-paying jobs for both skilled and unskilled workers, which typically include benefits such as health insurance, retirement packages or pensions, for example." Is this across the board or is it limited to only certain employers and/or positions? Recommend clarifying.
41	The Plan		Traffic and Safety Impacts, second paragraph: Regarding "at-grade rail/vehicle collisions, do the percentages correlate to the percentages of the vehicle type, i.e. there are more freight trains than passenger trains and there are more passenger vehicles than "freight" trucks. Regarding the third sentence, it is noted that the speeds of trains are regulated just as the speeds of vehicles are regulated. Regarding the fourth sentence, is there any sort of data indicating the frequency in which a train impacted an emergency vehicle's ability to respond to an emergency timely?
42	The Plan		Equity Considerations: Who will be able to participate in the discussions that identify the four respective sets of equity considerations (for A Strong Labor Force, A Safe and Efficient Multimodal System, Strong Markets and Reliable Supply Chains, and A Culture of Investment and Innovation)? District 7 would appreciate being included in these discussions.
43	The Plan		A Culture of Investment and Innovation: The existing text under this subject heading is well crafted. As an observation, as one of the most critical challenges involves garnering substantive support from the private sector as well as optimizing coordination amongst critical public sector agencies and community groups, is consideration being given to establishing one or more standing working groups, to help facilitate success in this regard? The LA version of CREATE (which hopefully can benefit from understanding any hurdles that hampered Chicago)? Would this be the focus of the "...recurrent goods movement-focused task force..." identified in Initiative 1?
44	The Plan		Incorporating Equity Considerations, second paragraph: Suggest changing "To capture the creation of new or aggravated inequalities in our communities, we..." to "In order to establish a more comprehensive composite of the inequalities experienced in our communities, we...."
45	Southern California Rail Investment Initiative		Although there are substantial freight rail facilities located in Los Angeles County, the Class 1 railroads that operate within the county have a much larger geographical focus. Additionally, the State has a strong interest in rail, from both a passenger and freight perspective. Perhaps consider identifying Metro as "Partner" rather than "Lead?"
46	Urban Freight Delivery Initiative		Recognizing the sheer number of local jurisdictions involved, if feasible and possible, it would seem likely that there would be increased chances for measurable progress if Metro were "Lead" instead of "Partner."
47	Equity for Goods Movement Initiative		Perhaps consider adding a discussion referencing and/or tying into the three AB 617 community efforts located within Los Angeles County?

	48	LA Metro Countywide Clean Truck Initiative	As the environmental document for the I-710 Corridor project is addressing both State and federal requirements (which among other things, facilitates the ability to pursue federal funding, it is recommended to reference the I-710 environmental document as "I-710 Environmental Impact Report/Environmental Impact Statement (EIR/EIS)." It may not be common knowledge that the "Mobile Source Air Pollution Reduction Review Committee," is an AQMD committee.
	49	LA Metro Countywide Clean Truck Initiative	Strategy 2.1: It is recommended that Caltrans be added to this working group as the state highway system would be anticipated to be a regular focus of efforts in this regard. Strategy 2.1, Actions 2.1d and 2.1e. For actions 2.1d and 2.1e, might it make more sense for Metro to "Partner?"
	50	Southern California Rail Investment Initiative	In the last sentence, it is suggested to delete the word "regional," as the demand for a more environmentally-responsible (and sustainable) movement of goods is—and will be, multi-faceted.
	51	Urban Freight Delivery Initiative	Strategy 4.1: The "curbside mobility working group" was not defined or discussed in the narrative under Urban Freight Delivery. It is recommended that some discussion of this group be included. Separately, it is recommended that Caltrans District 7 be included as part of the "curbside mobility working group" as there are many miles of conventional highway in Los Angeles County. Recommend Metro be identified as "Lead" for all actions under Strategy 4.3. Strategy 5.4, Action 5.4b. Recommend that District 7 be included as part of the Goods Movement Technology Working Group.
	52	The Plan	Let's Get Moving, third paragraph: Regarding the reference to the number of unincorporated communities in LA County in the last sentence, on page 64 the reference is to "...over one hundred..." Sixth paragraph. Are the five priority strategies, "...our stakeholders have identified..." the five initiatives included in this draft? If this is the case, it is recommended that the five priority strategies be specifically identified, either as part of this sentence or elsewhere in this paragraph.

Attachment B – GMSP Public Comments and Support Letters

Public Comments

Name	Comment #	Specific to the Plan or Early Action Initiatives	Comments Received
Jacob	53	The Plan	The plan does not investigate the use of Metro's rapid transit system for goods delivery, instead focusing on cleaner trucks and higher-capacity mainline rail corridors. However, the former does not improve traffic safety, only emissions; the latter does not improve transportation in the areas of LA county far from the freight lines. It is not obvious to me that reuse of Metro's system is possible (c.f. transportation scholar Alon Levy's remarks on the inherent difficulty of doing so at https://pedestrianobservations.com/2020/02/19/freight-rapid-transit/). However, both Dresden and Karlsruhe are attempting to reuse their tram network for freight delivery, so I encourage Metro to study whether an analogous approach might be appropriate here.
Richard	54	Equity Initiative	To help separate and speedup both commuters and freight, build the 710 Freeway tunnel.
N/A	55	The Plan	No Metro does not lead or coordinate well, such as with the SR-710 North Extension and funds diverted to parking structures and use elsewhere in LACity. Also, poor coordination and absence of leadership killed the High Desert Corridor and the good center/corridor that would have greatly reduced air pollution throughout the eastern sector of SCAQMD and the I-110/I-710 corridor.
Tom	56	Logistics Workforce and Competency Initiative	Invest in work force training upgrading and affordable living in northern LA County, Palmdale-Lancaster-Apple Valley. Long term PoLA/PoLB will lose out in shipping by cheaper and direct national transfer/transport east of California via Port - Prince Rupert and perhaps more to much cheaper Port Cardenas (Mex)
	57	Countywide Clean Truck Initiative	Only deals with <15% of total containers limited to LACo, not even SoCal or SCAQMD area. No relevant to national transfers.
	58	Regional Freight Rail Initiative	Metro must coordinate and assist the Ports of Los Angeles and Long Beach conversion from truck based to multi-modal/rail transfer from ship<>rail and then in High Desert Corridor Rail<>Truck. As demonstrated at Port of Prince Rupert and Port of Cardenas (Mexico).
	59	The Plan	NO not at all. Need much more visual, BlockFlow Diagrams and Flow-Charts rather than text unless you specifically want to have the readers turnoff and confuse. The purpose of the Goods Plan is to confuse, confound, and discourage readers (=Public) and knowledgeable concerned readers.



July 24, 2020

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Temple City
Walnut
West Covina
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Unincorporated Communities
Fourth District, LA County
Unincorporated Communities
Fifth District, LA County
Unincorporated Communities
SGV Water Districts

The Honorable Mayor Eric Garcetti
Chairman, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Draft Los Angeles County Goods Movement Strategic Plan Process

Dear Chairman Garcetti,

On behalf of the San Gabriel Valley Council of Governments (SGVCOG), we are writing to express our support and appreciation for the work that is carried out by the Goods Movement Planning Office. This office has successfully created a process that addresses the challenges of goods movement, unites goods movement planning activities across the agency, as well as developed partnerships with Los Angeles County's goods movement stakeholders, including the SGVCOG.

Goods movement has been a high priority for the SGVCOG for more than 20 years, first with the initiation of the Alameda Corridor-East (ACE) Project and more recently with the State Route 57/60 Confluence Project, both projects of regional and national significance being implemented by SGVCOG in partnership with Metro. The development of the Goods Movement Strategic Plan has embraced the need for goods movement infrastructure projects while prioritizing the environmental issues associated with goods movement as well as the need to plan for sustainable growth.

The Goods Movement Strategic Plan will guide the agency and region in moving Los Angeles County forward in a sustainable manner. Broad-based stakeholder input has been instrumental in shaping effective regional initiatives, including this plan, and the SGVCOG has participated in and appreciates the stakeholder process Metro has undertaken.

As the Goods Movement Strategic Plan progresses, the SGVCOG looks forward to the continued close coordination with the Metro highway program in moving forward on high priority goods movement projects like the State Route 71 freeway gap project in Pomona and the continued involvement of San Gabriel Valley cities and stakeholder groups. If there are any questions, please do not hesitate to contact me at (626) 457-1800.

Sincerely,

Marisa Creter
Executive Director
San Gabriel Valley Council of Governments



North Los Angeles County
Transportation Coalition

August 27, 2020

Mr. Phil Washington
CEO, Los Angeles County Metropolitan transportation Authority
One Gateway Plaza
Los Angeles, California 90012-2952

RE: **Draft Los Angeles County Goods Movement Strategic Plan**

Dear Mr. Washington:

On behalf of the North Los Angeles County Transportation Coalition JPA (NCTC) member agencies Los Angeles County 5th District, the Cities of Lancaster, Palmdale and Santa Clarita located in North Los Angeles County, we are pleased to support the Draft Los Angeles County Goods Movement Strategic Plan.

The LA Metro charter enabling legislation underscores the prominent role goods movement has in Los Angeles County mobility: *"Establishment of overall goals and objectives to achieve optimal transport service for the movement of goods and people on a countywide basis."*

The movement of people and goods is intertwined in North Los Angeles County – we share the same multimodal transportation network. The NCTC has participated in numerous LA Metro and other efforts to improve goods movement throughout Los Angeles County and we applaud the recent comprehensive Los Angeles County Draft Goods Movement Strategic Plan process.

The recent Covid pandemic highlighted the importance of our goods movement network from the ports to our local market. We must continue to work together to achieve mobility solutions with our goods movement partners who provide an essential service for our quality of life.

The NCTC JPA supports and looks forward to working with LA Metro on the implementation of the Los Angeles County Goods Movement Strategic Plan.

Sincerely,

Arthur V. Sohikian
Executive Director

Coalition for America's Gateways and Trade Corridors

AECOM

September 8, 2020

Moffatt & Nichol

Alameda Corridor-East
Project, San Gabriel Valley
Council of Governments

Broward County's
Port Everglades

The Honorable Mayor Eric Garcetti
Chairman, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

National Railroad
Construction and
Maintenance
Association

California Department
of Transportation

NASCO – North
American Strategy for
Competitiveness

Cambridge
Systematics, Inc.

The Northwest
Seaport Alliance

Canaveral Port Authority

Nossaman LLP

Cascadia Center

Orange County
Transportation Authority

Chicago Metropolitan
Agency for Planning

RE: Draft Los Angeles County Goods Movement Strategic Plan

City of Chicago

Dear Chairman Garcetti:

Port Authority of
New York & New Jersey

City of Industry

Port Houston

COMPASS – Community
Planning Association of
Southwest Idaho

I write to express congratulations and appreciation for developing Los Angeles County's Goods Movement Strategic Plan. As a key North American gateway, the Los Angeles region is a critical hub in our nation's freight network.

Port Newark Container
Terminal

Dewberry

Port of Hueneme

Florida Department
of Transportation

Port of Long Beach

Florida East
Coast Railway

Port of Los Angeles

Florida Ports Council

Port of New Orleans

Florida Transportation
Builders' Association, Inc.

Port of Oakland

Freight Mobility Strategic
Investment Board
(Washington State)

I commend you and your team for developing a thoughtful and comprehensive plan that examines the region's transportation challenges holistically. It also underscores the importance of meeting these challenges: nearly one-third of jobs in LA County are in goods-producing and freight-dependent industries. Nationally, the San Pedro Bay port complex supports nearly 3 million jobs across the United States.

Port of San Diego

Gateway Cities Council of
Governments

The nation's freight network is interconnected. Infrastructure efficiency, safety, and capacity in key freight hubs – such as Los Angeles County – impact the national freight system.

Port Tampa Bay

Great Lakes Dredge & Dock
Company

Beyond identifying challenges, the plan also outlines a roadmap to achieving positive results. Success in Los Angeles County will result in benefits both locally and nationally.

Port of Vancouver USA

HERZOG

Ports America
Chesapeake

HNTB Corporation

Prime Focus, LLC

Illinois Soybean
Association

I appreciate your leadership on this important issue and look forward to engaging with you as the Goods Movement Strategic Plan advances.

Puget Sound Regional
Council

Intermodal Association
of North America

RAILCET

Kootenai Metropolitan
Planning Organization

SANDAG - San Diego
Association of
Governments

Los Angeles
County Metropolitan
Transportation Authority

Sincerely,

Southern California
Association of
Governments

Majestic Realty Co.



Tampa Hillsborough
Expressway Authority

Maricopa Association of
Governments

Tennessee Department
of Transportation

Memphis Chamber of
Commerce

Washington State
Department of
Transportation

Metropolitan Transportation
Commission

Elaine Nettle
Executive Director
Coalition for America's Gateways & Trade Corridors

Will County Center for
Economic Development

WSP