

March 5, 2011

California Energy Commission Docket Unit 1516 Ninth Street, Mail Station 4 Sacramento, CA 95814-5504 **DOCKET**

10-ALT-01

DATE Mar 05 2011

RECD. Mar 15 2011

Subject:

2011-2012 Investment Plan for The Alternative and Renewable Fuel and

Vehicle Technology Program

Gentlemen:

The Gateway Cities Council of Governments (GCCOG) wanted to express our comments and request on the referenced investment plan. The GCCOG is anchored by the twin ports of Long Beach and Los Angeles. We are in the process of proceeding with an EIR/EIS (with various funding partners) to improve the I-710 freeway corridor – the major truck route for the ports. This includes a proposed freight corridor that is also examining the use of zero emission vehicles in it to move containers to and from the ports. Currently this freight corridor is about 18 miles in length with another study is under way to extend it at least another 20 miles inland.

The I-710 EIR/EIS includes the first Air Quality/Health Risk Assessment for a freeway project in Southern California. We are also in the process of comparing a companion Health Impact Assessment as part of the GCCOG Air Quality Action Plan. Air quality improvements are the number one priority for the GCCOG 27 cities and its 2.2 million residents. We are currently working with Cal START to understand the state of the industry with respect to the development of zero (or near zero) emission trucks and other types of similar vehicles. To us, this technology appears to becoming more likely but more help is needed. Specifically, the projections for future truck volumes on I-710 for the freight corridor are about 90,000 trucks per day — probably the greatest potential concentrations of trucks in the country. Our communities are behind wanting this freight corridor and the potential application of zero emission vehicles in it will have profound impacts to improving air quality.

More research and analysis is needed, however. Drayage is a unique logistics movement for the two ports. The ports are currently working through their Clean Air Action Plan and developing some of this technology but not outside the ports. We would like to see more allocation of funds toward the development of more concepts for zero emission drayage trucks. Also, in order for this potential system of zero emission trucks to work, a concept of development and operations is needed fitted around a good business plan. We believe that Southern California and GCCOG area could be the "incubator" for developing a plan for these types of vehicles based on a good operating business plan that will help assure the economic development and benefits from these vehicles. It is anticipated that various types of zero emission technologies will be ultimately developed and a good operating scheme that allows for their development and use is needed.

Therefore, we would support requesting from you as part of the investment plan assistance in developing these types of vehicles for use in this "green" freight corridor and help with funding to develop a concept of operations for this system.

We are also in the process of developing an ITS Implementation Plan for Goods Movement that would help facilitate the development and operation of a "green" freight corridor. We have previously developed an ITS Integration Plan for Goods Movement that has already led to the development of many ITS technology ideas to make goods movement for efficient. Further, we developed an ITS working group between the public and private sectors that will help expedite this plan and any other ventures

We would be glad to further explore our "ideas" with your staff and thank you for your consideration. We would also like to suggest having your staff make any presentations to our GCCOG Board about this in the near future.

Very truly yours,

Perm R. Will

Jerry R. Wood, P.E.

Director of Transportation and Engineering Gateway Cities Council of Governments

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