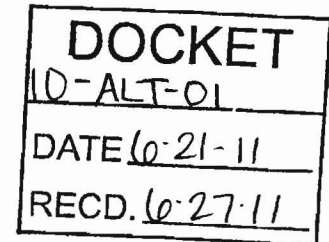




June 21, 2011

California Energy Commission  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, CA95814-5504



Subject: 2011-2012 Investment Plan for the Alternative and Renewable Fuel and  
Vehicle Technology Program

Gentlemen:

The Gateway Cities Council of Governments (GCCOG) and the Los Angeles County Metropolitan Transportation Authority (Metro) would like to share our thoughts on the referenced investment plan. This letter is a follow up to the GCCOG's letter of March 5, 2011, which indicated our initial support of the first draft of the CEC 2011-2012 Investment Plan. We also appreciate CEC staff's willingness to meet and discuss the unique "trucking" situation for the twin ports, Port of Los Angeles/Port of Long Beach, that anchors the southern portion of the GCCOG. The GCCOG has recently met with Metro staff to review the investment plan. Both our agencies will be partnering to support this plan and to work together to seek additional funding opportunities.

As discussed in the first letter sent to you by the GCCOG; the GCCOG, Metro, Caltrans, the Ports of Los Angeles and Long Beach (San Pedro Bay Ports), the Southern California Association of Governments, and the I-5 Joint Powers Authority has jointly funded the current environmental study for the I-710 Corridor Project. Among the three of the "Build Alternatives" that include a freight movement corridor from the San Pedro Bay Ports to the Vernon/Commerce rail yards, there is an Alternative that proposes a zero emission freight corridor, whereby zero or other low-emission vehicles will ultimately move cargo. Currently, this freight movement corridor is estimated to be about 16 miles in length. Additionally, as part of another analysis, a 20 mile inland freight corridor extension is being studied. Work on the I-710 EIR/EIS will culminate in the circulation of a DEIR/DEIS by February of 2012.

The GCCOG and Metro have jointly prepared this letter to request that, as part of the CEC Investment Plan, funding for developing a "green" freight corridor regional operations and implementation plan, and the subsequent business plan, be included. We strongly support the proposal for \$1 M for noncompetitive solicitation that can be accessed by Metropolitan Planning Organizations and Council of Governments for determination of regional Plug-in Electric Vehicle readiness. However, we would like to suggest, that this description (or another

part of the plan) include the development of a regional plan that will promote the development of zero emission vehicles powered by differing fuels and hybrid vehicles, ultimately leading to PEV. This is based on the assumption that a single technology will not be the "silver bullet" for this freight corridor, and multiple types of zero emission transportation technologies will be required. This regional plan will, therefore, examine the full range of zero emission vehicles, the "back-bone" systems needed to support them, and include an implementation plan that makes sense to the industry. We believe this will be of great benefit to CEC and the results can be used throughout the entire State.

Improving air quality is the number one priority for the GCCOG's 27 cities and its 2 million residents in pursuing the I-710 Corridor Project. The I-710 EIR/EIS includes the first Air Quality/Health Risk Assessment for a freeway project in Southern California. At the request of the community, the GCCOG is preparing an Air Quality Action Plan as well as a Health Impact Assessment. Use of zero-emissions vehicles within the GCCOG subregion has modeled positively in terms of providing air quality improvement under existing and future conditions.

In an effort co-funded by Metro and South Coast Air Quality Management District, CALSTART is assessing if zero emission trucks can be commercially available if the I-710 Freight Corridor is built. Zero emission technologies does not seem to be the barrier in commercializing trucks, however, help is needed in supporting the business development and implementation. The projected truck volumes on the I-710 freight corridor are about 90,000 truck trips per day – probably the greatest concentrations of trucks in the country. The need for zero emissions vehicles is warranted upon this anticipated growth, which can be one of building blocks for the business case. Our communities are supportive of the freight corridor, the separation of trucks from automotive traffic, and the potential application of zero emission vehicles along with their anticipated impacts in profoundly improving air quality.

Given that the logistics industry is extensive, addition research and analysis is needed. For example, drayage has unique logistics movements within the ports, which requires an understanding of transloading, long-haul facilities, and local destinations. The ports are currently working through their Clean Air Action Plan and developing some of this technology. However, they have confined their efforts to within the ports themselves. We would like to see more funds allocated toward the development of concepts for zero emission drayage trucks. We have also identified a need for a development and operations implementation plan as well as a solid business plan

Southern California and the GCCOG area can be the "incubator" for developing a plan for these alternatives vehicles based on a sound operating business plan that will help ensure the economic development and benefits from the use of these vehicles. The practical application of these vehicles within the I-710 corridor will establish the development and use of these vehicles throughout the State. We anticipate that various types of zero emission technologies will ultimately be developed and a sound operating and implementation plan that allows for their development and use is required.

We appreciate your consideration and support for our suggestions and look forward to making an application for a future solicitation. GCCOG and Metro are also actively engaging in partnerships with other agencies and groups (like the ports and trucking companies) to "fold them" into this regional plan too.

Very truly yours,



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