

## Alameda CTC Goods Movement Plan Comments and Responses to Draft Plan

#	Comment Summary	Response
A1	<p><b>Anna Lee, Alameda County Public Health Department:</b></p> <p>Mitigation: Need to show how certain strategies in Opportunity Packages mitigate the negative impacts of other strategies in same package to create a balanced Package.</p>	<p>The strategies included in this Plan are not mitigations as this term is used in a CEQA analysis. They are not intended to replace any mitigations identified in previously certified EIRs nor are they intended to create new mitigation conditions for projects that have a certified EIR. There are existing public health impacts associated with emissions from goods movement activity in many of the region's key goods movement corridors and increases in goods movement that are associated with economic and population growth in the County and the region could exacerbate these impacts. For these reasons, the Opportunity Categories include strategies for impact reductions in addition to those that should be achieved through implementation of the mitigation measures already included in adopted EIRs. Language was added to clarify this in Opportunity Category #1 and a reference note was added to direct readers to a report by the Port of Oakland regarding implementation of the required mitigation measures. This should provide readers with better information about the relationship of strategies in the Plan to already adopted and implemented mitigation measures</p>
A2	<p>Negatives not highlighted in Plan: Need to describe how an increase in activity at the Port and the new Oakland Army Base development will lead to increased diesel PM emissions and potentially increased respiratory-related, stroke and cardiovascular hospitalizations and ER visits for West Oakland residents, as well as increased noise and rail crossing traffic impacts. Also, increased rail activity, esp. along southern route, will increase emissions, noise, and traffic safety impacts to adjacent communities.</p>	<p>Increased activity at the Port associated with the Army Base redevelopment was addressed in the EIR/EIS for the Army Base and mitigations were identified and are being implemented (see comment above). <b>Language was added to Opportunity Category #1 to clarify this and a note was added to refer readers to documentation on the status of implementing the mitigations required by the EIR.</b> The discussion of the rail strategy in Opportunity Category #1 indicates that increased rail will have impacts on adjacent communities in terms of noise and delays at at-grade crossings and recommends a program of quiet zones and grade crossing improvements to address these impacts. In Section 6.1 we have also added language that notes that we are unable to do definitive analysis of the relative emissions benefits of rail vs. truck movements (the strategies are intended to divert truck traffic to rail) due to proprietary nature of some of the rail data. However, we also note that national data show that rail is significantly more energy efficient</p>

		<p>than trucking and this generally translates to lower emissions. The Plan also notes that by working with the railroads to help them provide more efficient infrastructure, the public gains some leverage in negotiations to bring cleaner locomotives to Alameda County and this is an objective of the strategy.</p>
A3	<p>Positives not highlighted in Plan: Increased mode shift from drayage trucking to rail causing a projected decrease of 21 million truck VMT and 1,280 truck trips/day on I-580 and I-880 should cause positive changes in emissions and other environmental health impacts to local communities along those routes.</p>	<p>While it is true that there is sufficient information on truck trip reduction associated with the rail strategy to estimate reductions in truck emissions, there is not sufficient information to estimate net effects, since rail volumes will increase and rail emission factors are proprietary. It would not be appropriate to take credit for truck emissions reductions without taking into account the net effects. Language was added to Section 6.1 that explains the data limitations of this type of emissions analysis.</p>
A4	<p>Appendix K, Section 9.5 should focus not just on drayage trucks but also on medium duty trucks such as delivery trucks.</p>	<p>This comment refers to the Appendix and any recommended changes in language will be made clear in final revisions to the appendices. There are a number of different ZEV/NZEV strategies that were evaluated for the Plan. The one specifically mentioned is focused on drayage trucks because it is included in the Sustainable Global Competitiveness Opportunity Category. However, there are other ZE/NZE strategies in the Modernized Infrastructure Opportunity Category that are focused on all trucks. We also note that in an effort to begin moving forward with these strategies even before the Plan is adopted, Alameda CTC, other Bay Area Congestion Management Agencies, MTC, and the BAAQMD submitted a set of Pilot Project proposals to ARB for the statewide Sustainable Freight Action Plan that included ZE/NZE demonstration and incentive programs aimed at applications in addition to drayage trucks.</p>
A5	<p>Mitigations mentioned in Plan are currently unfunded and need a clearer funding strategy. It is unclear where the Plan priorities are because of lacking specificity regarding health impacts of strategies.</p>	<p>The Goods Movement Plan is not a programming document and as such does not identify funding amounts for any particular projects or programs. The Moving Forward section describes funding needs and funding options, mainly to give a sense of the degree of leveraging of external funds that would be needed to realize the Plan. Funding options for the impact reduction strategies are specifically identified. As noted above, local agencies are already working to take advantage of the growing number of funding opportunities for sustainable</p>

		freight projects. Language has been added in Section 7.3 that suggests that efforts to identify specific eligible projects that would implement the impact reduction strategies should begin immediately and partnerships should be formed to apply for these funds beginning in 2016. As noted in the previous comment, this is already being done.
B1	<p><b>Muntu Davis, Alameda County Health Care Services Agency, Public Health Dept.:</b></p> <p>Need to incorporate data on existing community health conditions and use this in the assessment and prioritization of mitigation strategies. Also need clear plans for implementation and funding for mitigations.</p>	<p>Both chapter 2 and chapter 5 reference the public health issues and impacts related to diesel emissions and goods movement. We respectfully note that we have already taken this into account in the development of impact reduction strategies that are included in the opportunity packages.</p> <p>With respect to plans for implementation and funding for impact reduction strategies, see prior response on this issue (A5).</p>
C1	<p><b>Ditching Dirty Diesel Collaborative (Jill Ratner as contact):</b></p> <p>Need to seek funding for strategies in Plan to reduce environmental and community impacts from goods movement.</p>	See response to prior comment on seeking funding (A5).
C2	Work with ACPHD and BAAQMD to assess the environmental and community impacts from proposed Plan strategies. Use this assessment to understand what level of impact reduction is needed to counter any negative impacts of proposed changes to the County's freight system.	Language has been added in Section 7.1 to recommend that Alameda CTC and MTC work with APCHD and BAAQMD to conduct more rigorous analysis of the relationship between goods movement sources and activity and public health impacts. It further notes that improved transportation modeling tools will be needed to do this and MTC is beginning to identify needed improvements to its transportation models to better capture goods movement activity.
C3	Prohibit strategies that increase health inequities for residents of already overburdened communities.	Individual projects are generally subject to CEQA process that takes into account cumulative impacts. Once a project has a certified EIR it should not be denied funding.
C4	Implementation Plan should include detailed analysis of which areas in the County stand to be most impacted	See response to C2

	by proposed changes detailed in the Opportunity Packages.	
C5	Target demonstration and adoption of zero emission technologies to vehicles and equipment within the Port. Yard trucks and other equipment staying entirely within the Port could be good targets for electrification as they could remain close to charging stations.	The strategies in Opportunity Category #1 and #2 already include some targeting. For example, the ZE/NZE program in Category #1 notes that the MTC Freight Emission Reduction Strategy is already identifying specific demonstration opportunities in the I-880 corridor. The Freight Corridors and Community Impact Reduction Initiative is also targeted to communities immediately adjacent to freight facilities and hubs. The ZE program in Opportunity Category #3 is targeted to the I-80, I-880, and I-580 corridors. Language was added in Section 7.1.1 indicating potential funding opportunities that will be immediate targets of near-term implementation funding.
C6	Include details about how truck conversions to zero-emission technology can be funded so that burden of upgrading is not placed on independent contractor truck drivers.	In the discussion of the existing funding programs of AQMD and Cap and Trade we added language that suggests that special emphasis should be placed on targeting some funds to the owner operators but also notes that getting funds to larger fleets is also desirable from an impact reduction perspective.
C7	With the Oakland Army Base redevelopment, incentivize transition to Tier 4 locomotives, identify how to source renewal energy and potential for renewable energy generation at the Port itself, use ITS to reduce queuing and congestion, and analyze the potential for nighttime Port operations so as to reduce truck idling and congestion (but also analyze potential negative impacts to local communities from nighttime noise and light pollution).	Opportunity Category #3 already includes a Terminal Emission Reduction program and the rail strategy mentions using public involvement to incentivize use of Tier 4 locomotives. We have also added language in Section 6.1 to emphasize the importance of using public-private rail partnerships as a way of incentivizing the railroads to use Tier 4 locomotives. Opportunity Category #1 also includes strategies (FRATIS) to use ITS to reduce queuing, and we include a strategy for extended gate operations. The potential impacts of night gate operations on communities is discussed as part of the strategy evaluation that will be included in the appendices of the Plan.
C8	Also with the OAB development, enforce parking restrictions so local streets are less impacted, provide Complete Streets guidance for West Oakland neighborhoods, increase	Enforcement of parking restrictions is part of existing mitigation program as required by CEQA EIR.  We have included a strategy on Complete Streets guidance that would apply across the county and we have a workforce development strategy in

	<p>recruitment and job training of West Oakland residents for the new jobs created, and reference not OAB Phase II, but rather Oakland Global Trade and Logistics Center to ensure consistency of nomenclature.</p>	<p>Opportunity Category #1 that targets job development for neighboring communities.</p> <p>We have changed all references to the OAB to the Oakland Global Logistics Center.</p>
C9	<p>With southern rail route strategies, mandate adoption of low emission and Tier 4 locomotives, put a moratorium on coal shipments until a comprehensive review of their environmental and health impacts has been conducted, construct grade separations before or as a condition of adding new track, and establish local hiring policies for construction projects associated with rail expansions.</p>	<p>With southern rail route, this is an existing UP line and local agencies have no jurisdiction over what types of locomotives UP can use on lines they own other than Federal emission standards that only require use of Tier 4 locomotives when new locomotives are purchased. Use of Tier 4 is identified in the Plan as a public benefit that could be pursued as a part of the rail strategy in exchange for public investment in capacity.</p> <p>Local agencies do not have jurisdiction to restrict coal movements. In this case, coal shipments are regulated as interstate commerce by the Federal Government. Federal regulations prescribe safe handling practices and equipment but do not generally prohibit the carriage of particular commodities, even through densely populated areas. The state has limited safety regulatory authority through the Public Utilities Commission but this cannot be used to limit the types of commodities that are carried. Local agencies can and should participate in any regulatory hearings on this subject when undertaken by the Federal government.</p> <p>There is a grade separation program recommended that would include the southern route. The Moving Forward section (in the partnership table) notes that a prioritization process needs to be developed and would certainly include impacts on communities as a factor.</p> <p>At the end of Section 7.1.1 we have added a statement that in implementing specific projects Alameda CTC with work with East Bay EDA and other partners to support local hiring.</p>
C10	<p>Identify clear, enforceable targets for hiring in freight-impacted areas, with goals tied to zip codes, not city or county wide. Also limit the use of temp labor in warehouses across the</p>	<p>Alameda CTC has a local business contracting program that supports local and small local businesses participating on projects and programs funded with local voter approved transportation dollars and these typically involve targets for participation levels. Specific local hiring provisions</p>

	County. Finally, establish partnerships between goods movement employers and community colleges for low cost training programs.	are usually addressed during construction contract negotiation with the managing agency.  Language was added to encourage continued development of transportation and logistics training programs through the community college participation in the East Bay Transportation and Logistics Partnership.
C11	Fund the electrification of designated truck stops within freight-impacted communities to minimize idling in residential areas. Ensure local hiring practices also require a living wage. Create a funding source to support the replacement of conventional diesel with zero emissions technology through a cargo/container tariff fee. Require retrofitting for electrification of all existing port and rail yard equipment before new freight facilities are allowed to be built. Require all new freight facilities utilize zero or near-zero emissions technology. Go beyond state requirements on diesel emissions for vehicles entering and operating within Port and rail yard.	If the electrification proposal is for truck parking areas in the Port complex, this may be impractical since these parking areas are likely to move over time and not be permanent in specific locations.  The container fee proposal would require much more study to ensure that this is actually the best way to fund the projects without negatively impacting port competitiveness. It should be noted that studies conducted at other West Coast ports have concluded that fees do impact Port competitiveness and cause cargo diversion to other ports.  The suggestions for specific zero and near-zero emission requirements are new strategies that were not recommended during the strategy development and evaluation phase. These are major strategies that would have significant impacts on costs and operations that need to be evaluated against the potential benefits. There may be more operationally efficient and cost effective approaches to achieve necessary emission reductions that do not involve electrification.
C12	Ensure enforcement of designated truck routes is adequately addressed through adequate signage and education of truck drivers about revisions in truck routes. Prioritize traffic safety improvements for designated truck routes, particularly at intersections with high incidences of truck-involved collisions.	Language was added to Section 6.3 that indicates that while strategies included in the Plan are aimed at encouraging compliance with truck route designations and rules, enforcement is a local policing issue. Safety improvements were a factor in prioritizing the local roads projects already included in the plan.
C13	Require that any public funds for rail improvements benefitting UP, Southern Pacific or other rail lines come	It is the intent of the rail strategy to work with the railroads and use public funds to encourage use of clean locomotives. Prior to entering into negotiations we'd hesitate to make this a condition of public

	with a mandate that the benefitted carriers use the cleanest locomotive engines possible.	participation because it might foreclose other options to achieve emissions reductions through improved operations.
D1	<p><b>Obaid Khan, City of Dublin:</b></p> <p>It seems counter intuitive that the I-580/I-680 interchange project would significantly improve traffic circulation and reduce delays but generate no benefits for goods movement. Does the Countywide model used have all the correct information on the planned project or is it appropriate to evaluate the operation and safety issues per the approved evaluation strategy?</p>	<p>We agree that improvements at the I-580/I-680 interchange should be a priority because of the level of truck volumes, delays, and safety issues. The Countywide model is not the best tool to evaluate all of the operational benefits of specific projects and it was not used to estimate operational benefits (it was only used in select cases to estimate capacity benefits when these were part of a project). Nonetheless, the specific proposed project for which a PSR was conducted, is very expensive and not likely to move forward. Because there is funding for a project in Measure BB, a new project will be scoped and this will address the goods movement issues and benefits of such a project. Language was added to Section 6.3 of the Plan to indicate the importance of addressing issues at this interchange and mentioning the new scoping study.</p>
E1	<p><b>Chris Kraba, Preferred Freezer:</b></p> <p>A section should be added to the Plan specific to overweight truck routes from the Port to surrounding cities and the immediate economic and operational benefits they would bring. Specifically, a through connection should be extended from the Oakland network to San Leandro via San Leandro St to Doolittle via 98<sup>th</sup> Ave.</p>	<p>The analysis conducted for this plan did not indicate the need for an extensive, countywide overweight network. The existing overweight route within the Port complex offers access to a growing number of sites suitable for development by shippers who would most benefit from a heavy-haul network. However, the Plan does include a truck route guidance and coordination program which could be used to encourage adjacent cities to review all truck route designations crossing city boundaries (including overweight corridors) and the issue raised would be appropriate for consideration as part of these guidelines.</p>
F1	<p><b>Supervisor Haggerty's Office</b></p> <p>Page 1-2 bullet #3, References performance measures – what are these? I don't see these clearly identified later in the report.</p>	<p>The performance measures are provided in detail in the performance measures tech memo and are presented, with evaluations, in the Strategy Evaluation tech memo. <b>Both of these documents are included in the appendices.</b></p>
F2	<p>With 29 truck involved crashes in 5-yr period at 580/680 perhaps "Safety" should have its own section. Reference to I-880 "hot spots" is vague.</p>	<p>See response to City of Dublin's comments for suggested treatment of the 580/680 interchange (D1). The details of the 880 hot spots are addressed</p>

	Suggest adding detail of locations of hot spots.	in the detailed needs assessment that is included in the appendices.
F3	Would transloading "eliminate" truck trips? Or does potentially significantly reduce truck trips?	Good point. We have changed the language to say that transloading can reduce truck trips.
F4	<p>C1 project – a costly grade separation would only result in Medium positive impact for safe &amp; reliable?</p> <p>C-5 project – a costly new overpass results in low positive impact to Safe and Reliable?</p>	<p>We are eliminating the ratings from the final data because they are confusing without the context provided by the detailed strategy evaluations that are included in the appendix. The tables have composite ratings that aggregate results for a wide variety of performance measures. This is not clear in the current presentation so we are eliminating the composite ratings. However, we are including the ratings in the strategy evaluation report that will be included as an appendix.</p> <p>For the C1 project (7<sup>th</sup> Street Grade separation), we stand by the medium rating for the Safe and Reliable category. There were two relevant performance measures evaluated for this project under the Safe and Reliable category, Crashes-Crossings and Bridge Conditions. There have not been collisions reported at this location and the project is not geared at doing anything further on collision avoidance. So this gets a low rating. But the project does bring the bridge conditions up to current standards to meet capacity needs and this gets a high rating. In sum, the project thus gets a medium rating for Safe and Reliable.</p> <p>For the C5 project, the Adeline St overpass, we agree that this project should get a higher rating and have adjusted it to a high rating for Safe and Reliable in the appendix report. It initially received a low rating because it was at first not broken out as a separate project and was evaluated in tandem with the other Oakland Industrial Truck Routes (which had less focus on Safe and Reliable) in section 7.6 of the appendix report. Evaluated on its own, it should receive a high rating for Safe and Reliable.</p>
F5	Page 1-2 – should neighboring regions be added to list of partners?	Neighboring regions were not direct partners in the development of this plan. However, the relationship between Alameda CTC and neighboring regions is of critical importance to the Plan and this is not emphasized more in the Executive Summary. We have also added language in Section 7.1 to indicate



		the importance of partnerships with neighboring regions.
F6	Section 4-6 – did local jurisdictions submit comments on truck routes?	Each of the cities in Alameda County were contacted directly for information about their truck routes. After the truck route map was completed it was reviewed by the Technical Team (which includes representatives from the jurisdictions) and ACTAC. After this review, the map was posted on the Alameda CTC website and comments were invited from the jurisdictions. All of the comments that were received are reflected in the final version of the maps.
F7	Opportunity packages; goals; goal areas; project description and project elements; performance across goal areas. The references are confusing. Clear objectives and goals must be stated.	Whenever these terms are introduced, we have provided definitions. In response to confusion about what “packages” means in the context of this Plan, we have also changed the name to “opportunity categories.”
F8	Maps: Pleasanton has restricted truck routes on First Street – double check/correct Fig 4.4  Route 84 – double check truck restrictions through Niles Canyon –it seems a lot of trucks pass through this corridor and the plan maps show it as restricted  There should be consistency between the rail maps and truck maps in terms of scale and nomenclature. Highways on these maps need to stand out more	In response to requests for truck route information, the city of Pleasanton provided information about designated truck routes but did not indicate any prohibited routes. The Circulation Element of the city does not indicate that First Street is a prohibited route. Based on this information, no change has been made to the maps.  The restrictions on SR 84 that are indicated in the map refer to size and weight restrictions. The route is not prohibited to all trucks and some trucks are allowed to use this route.  In order to provide greater consistency in the scale of maps, we now provide both county and regional scale maps of the system to provide higher resolution at the county level but to also show the regional context of Alameda County's goods movement system.
F9	Under the global competitiveness section, it seemed that the portion showing and impact to Oakland was supposed to have been corrected/removed (domestic capacity)	The call out box in the Global Competitiveness Opportunity Category has been changed to refer exclusively to the strategy of transloading international cargo and the truck trip reductions have been edited to only include the benefits of the international transloading strategy.  Throughout the document “Packages” has been changed to “Categories” to indicated that these are

	Overall: The Word "Packages" is confusing and seems that there should only be a selection of one over the other	all components of an overall strategy and not packages among which a single packages is to be selected.
G1	<b>Ruben Izon, Alameda County Public Works Agency</b>  Modify call-out box on page 5-19 of plan to eliminate "at the two signalized intersections" from the first sentence of paragraph 2.	The requested change has been made.
H1	<b>Planning, Policy, and Legislation Committee, December 2015</b>  Consider adding an addendum of policy suggestions that are not within the jurisdiction of Alameda CTC	Throughout Chapter 7 of the Plan we have identified policies and actions that would be the responsibility of agencies other than Alameda CTC and have indicated which agencies would have these responsibilities. In addition, we have provided a summary of roles and responsibilities for all of the strategies in Table 7.1 including roles of many agencies in addition to Alameda CTC.
H2	Plan should clearly communicate Alameda County's role supporting the megaregion. Plan should convey that Alameda County shoulders impacts such as emissions and potholes from goods movement activity that benefits the entire state. Consider adding graphic showing freight flows throughout Northern California Megaregion from earlier materials.	In the Executive Summary that has been added to the final version of the Plan we have included a new section that describes the role of Alameda County in the megaregion and this has been placed right at the beginning of the Plan.
H3	Truck parking should be rated high on economic prosperity due to economic activity and sales tax revenue from associated truck services.	As per another suggestion from the PPLC, all ratings have been removed from the tables in the Plan. However, we will make the requested change in the strategy evaluation report that is included as an appendix to the Plan
H4	Railroad quiet zone program should be rated high on quality of life.	As per another suggestion from the PPLC, all ratings have been removed from the tables in the Plan. However, we will make the requested change in the

		strategy evaluation report that is included as an appendix to the Plan
H5	Plan should discuss role of high capacity passenger transit in improving reducing freeway delay on I-580 which could reduce truck delay and idling.	Language has been added to the Modernizing Infrastructure Opportunity Category indicating that most major goods movement corridors are shared-use corridors and can benefit from mobility strategies such as high capacity transit in the I-580 corridor. When these strategies are demonstrated to have overall mobility and congestion relief benefits, they will be included in this Category.
H6	Plan should include a "cash for clunkers" type of program to pay for retirement of older, dirtier trucks. Program could be implemented at state level and should include an adequate level of funding to ensure successful participation by truck owner/operators.	Language is included in the Near-Zero and Zero Emission Technology Advancement Program (Opportunity Category #2) to indicate that special efforts will be made to provide funding to smaller trucking firms to allow them to retire their older, dirtier trucks.