

Alameda Countywide Goods Movement Plan – Draft Strategy Evaluation Technical Memorandum
 Comments Received and Responses

Stakeholder	Comment	Responses
City of Emeryville	4.3.2, Jack London - Elmhurst – This segment does not involve Emeryville, but we note that “This analysis does not take into account the potential growth in intermodal traffic along this route if it proves too difficult to make necessary improvements along the Martinez Subdivision through Emeryville, where there are considerable right-of-way constraints and community impacts.” The Study should provide for more improvements on this segment to reduce the pressure for increased capacity through Emeryville.	As noted in the comment, the report does recommend improvements on the Niles Subdivision to accommodate rail traffic in and out of Oakland, including traffic for which there is insufficient capacity on the Martinez Subdivision with its current track configuration. The particular segment on the Niles Subdivision noted by the commenter, actually looks like it should have sufficient track capacity even if growth is diverted away from the Martinez Subdivision. As a result of this comment we have reviewed the prior analysis and noted an error in the report. This segment of the Niles Subdivision is already doubletrack. The LOS calculations that are referred to in the report assume that the Niles Subdivision only has single track. While that is true of most of the Niles Subdivision, it is not true for this particular segment. Therefore, even without the project noted, this segment should have sufficient capacity to handle growth diverted from the Martinez Subdivision
City of Emeryville	4.3.7, Martinez Subdivision “This section of the Martinez Subdivision is constrained and does not have sufficient width to accommodate projected future demand. Project could consist of ROW acquisition, trenching, or other alternatives.” Again, ROW acquisition in Emeryville is <u>not an option, this is the heart of the City and the Priority Development Area</u> . Trenching should be evaluated in this section if additional capacity is needed. Double decker trains may be a consideration alleviate Level of Serve for trains as well as crossing vehicles. What LOS is acceptable is this a CEQA consideration – locally we accept LOS E routinely without improvement. Land uses jeopardized by takings directly adjacent to the existing ROW, all within a Priority Development Area include: Bay Street Regional Shopping Center, Hotels, Biotechnology campuses, Ikea, Park spaces, major development campuses for which millions of dollars in remediation has been completed and not least of which, the 4 th busiest Amtrak station in the State plus three above grade crossings – existing and proposed at nearly \$20M each.	We agree with the comment. This is the reason that no capacity improvements were recommended for the Martinez Subdivision through Emeryville.
City of Emeryville	8.2 “Bay Bridge Living Levee and Offshore Breakwater	The living levee is designed to protect the toll plaza and adjacent

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	<p>Installation”. Study says this will protect the Emeryville Crescent tidal wetland, but it’s not clear how it would do that. As shown in the diagrams, it only appears to protect the toll plaza area. The City has an upcoming Crescent trail study and may be exploring options for levees along the crescent from Powell to the toll plaza, we are interested and how the County can work with us and other jurisdictions to address transportation assets affected by sea rise and extreme storm activity.</p>	<p>road from inundation associated with SLR. The offshore breakwater is designed to protect the toll plaza, adjacent road, and Emeryville tidal wetland from increased wave overtopping and erosion associated with future storms and SLR. However, the breakwater will not protect the tidal wetland from inundation associated with SLR. An additional adaptation strategy will have to be implemented to protect the wetland from inundation including placing fill to raise the marsh, road, and path elevations. We edited the language to reflect this.</p>
City of Emeryville	<p>9.11-9.12 – We advocate for no crude oil by rail through Emeryville, rather than just improving its safety.</p> <p>[Letters sent by City of Emeryville to Federal delegation also provided as example of opposition to transport of hazardous materials by rail in Emeryville]</p>	<p>Comment noted. Determination of the commodities that can or cannot be transported by rail is the jurisdiction of the Federal Rail Administration or the federal Surface Transportation Board.</p>
City of Emeryville	<p>9.14 – Quiet Zone System – again we support this. Prioritizing PDAs seems a rational criteria for prioritizing limited funds in a Countywide program, as well as train volume and variations in and maximum speed</p>	<p>The specific criteria for prioritizing quiet zones will be developed as this program is executed. The suggestions will be considered at that time.</p>
City of Emeryville	<p>9.16 – Mitigations – While staff support air filters and double/triple pane windows as mitigations to freight transport we are concerned by the negative impacts of sound walls including reductions to access, plus aesthetic and quality of life impacts , and oppose installation of sound walls in Emeryville and caution use elsewhere</p>	<p>The details of what types of impact reduction methods will be supported by this program will be developed as the program is executed. In addition, the specific approaches that are relevant to a particular project may vary from site to site.</p>
City of Union City	<p>Page 1-3 Table 1.2 Descriptions and Guidelines for Rating Assignments – The possible ratings combinations list several same ratings combinations under the overall ratings (i.e. Medium High is under high and medium.) This is confusing to know if medium high is a medium or high priority. Is there a clearer way to express this concept?</p>	<p>We have inserted a graphic to better demonstrate this.</p>
City of Union City	<p>Section 4.3.4 and Section 4.3.5 Hayward Double Track, Niles Subdivision and 4.3.5 Niles Junction Bypass</p> <p>The project description is incomplete to facilitate the movement of goods.</p>	<p>With regard to the Industrial Connection, we believe the primary purpose and benefits of the project are related to commuter rail/transit connections and therefore do not agree that this project should be included as a high priority in the Goods Movement Plan. However, the project should be evaluated for its</p>

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	<p><i>In addition to the double track from Elmhurst to Industrial Parkway, the “Industrial Connection” needs to be constructed in the vicinity of the South Hayward BART Yard. The Industrial Connection is a connector track from the Niles Subdivision to the Oakland Subdivision that will enable the Capitol Corridor train to bypass the Niles Subdivision south of industrial, and thereby create additional capacity for freight on the Niles Subdivision, and enable Capitol Corridor to serve the Union City BART Station.</i></p> <p>In conjunction with the planned grade separation of Decoto Road and the Oakland Subdivision, the Oakland Subdivision should be elevated near Decoto Road to the height of the BART tracks, to complete the Union City Intermodal Station. It will also be necessary to construct the Shinn Connection in the vicinity of the Shinn Yard, that will provide a connection from the Oakland Subdivision to the Centerville Line, Construction of the Shinn Connection will also enable the ACE train to serve the Union City BART Station.</p> <p>A CEQA Notice of Determination was Filed March 1, 2006, on the track improvements described on the Niles and Oakland Subdivision, State Clearing House Number 2003082100, Union City Intermodal Station Passenger Rail Project Final EIR.</p> <p>Capitol Corridor Joint Powers Authority is evaluating</p>	<p>passenger benefits.</p> <p>With regard to the Capitol Corridor moving to the Coast Subdivision, this is not evaluated in the Goods Movement Plan because it is one of a number of options that the Capitol Corridor is considering to expand its operations in the Oakland to San Jose Corridor. This would also require new agreements with the Union Pacific. As a result, we believe that it is premature to evaluate the impacts of this strategy on goods movement.</p>

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	<p>double tracking the Coast Subdivision from near the Oakland Coliseum to the Great America Station, and provide direct passenger rail service from Oakland Coliseum to Great America and bypass the existing Capitol Corridor stops in Hayward, Centerville, and potential Union City BART Intermodal Station. The Capitol Corridor proposal is inconsistent with Alameda County Transportation Commission policies for passenger rail to serve Priority Development Areas. The Alameda County Goods Movement Plan should evaluate the impact on the movement of goods and allocation of resources, should Capitol Corridor implement its vision.</p>	
City of Union City	<p>Section 4 also discusses increasing freight on the Coast line, if this occurs grade separation of all street crossings in Union City will need to be funded and constructed. Quiet zones will be needed.</p>	<p>Agreed. However, we would also point out that the purpose of the grade separation and quiet zones programs is to create a funding program to support future rail impact reduction needs as they are identified. Since the future routing of trains from Niles Junction to Oakland is somewhat dependent on whether the capacity improvements for the Niles and Oakland Subdivisions recommended in this plan are made, the future rail impact reduction needs along the Coast Subdivision can be evaluated in the future and if necessary, Union City can apply for any available funds in the recommended program.</p>
City of Union City	<p>Section 7 -Page 7-17 Table 7.8 It should be noted that Whipple Road is adjacent to the Decoto District in Union City. Decoto District is a community of concern.</p>	<p>We noted this.</p>
City of Fremont	<p>Section 4.2.2 of the memorandum calls for improved highway rail crossing safety at four at-grade crossings in the City of Fremont. The locations are: Fremont Blvd, Maple St., Dusterberry Way and Nursery Avenue. The City requests three additional rail crossings for safety improvements at Clarke Drive, Shinn Street and Blacow Drive. The proposed rail crossing safety improvements can position these crossings for the City to pursue Quiet Zone funds under the County Program mentioned in Section 9.14. Establishing quiet zones in the Fremont rail crossing areas which are in Priority Development Areas (PDAs) or next to PDAs will help to garner community support for</p>	<p>The creation of the recommended rail grade separation and quiet zones programs will allow cities to add additional projects at a later date. The only specific rail crossing improvement projects evaluated in the plan were those that have been previously submitted for funding consideration.</p>

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	the increased development and intensity planned for Priority Development Areas.	
City of Fremont	Section 7.1 of the memorandum discusses Fremont Industrial area and freeway connector routes. City of Fremont supports the focused improvements in the Warm Springs area along Route 262/Mission Boulevard Corridor between I-680 and I-880. The Mission Boulevard Corridor is next to the Tesla Manufacturing plant which plans to expand from 50,000 cars production annually to 500,000 cars production annually, a significant ten-fold increase. The City does not support the expansion of truck route designations on Auto Mall Parkway, Boyce Road/Cushing Parkway, Fremont Boulevard, Warm Springs Boulevard and Warren Avenue. The City does support the Auto Mall Parkway Cross Connector widening between I-680 and I-880 and Fremont Boulevard widening from I-880 to Grimmer Boulevard. The widening of both of these segments conform to the City's General Plan.	<p>The 262 project is a Tier 1 (high priority) project and your support is thus consistent with our evaluations.</p> <p>The Auto Mall project was rated lower and not included as a priority project, which is in agreement with your comment. Future support for the Auto Mall Parkway Cross Connector project based on consideration of non-goods movement criteria (such as whether it is in the General Plan) is not addressed in the goods movement plan but can be addressed in other planning and programming decision-documents. Regarding designation of additional truck routes, this is ultimately subject to local authority.</p>
City of Berkeley	<p>Page 2-3 ID C8 Rail Quiet Zone This project was given only a medium rating for quality of life and was given no rating for economic prosperity. However, the whole purpose of establishing a rail quiet zone is to improve quality of life by relieving residents and employees along the corridor from the noise pollution produced by the soundings of horns as trains approach at-grade crossings. With implementation of the project, the improved quality of life would increase property values. The project should therefore be given a high rating for quality of life and at least a medium rating for economic prosperity.</p>	<p>We agree with the assessment and will change the rating to a high for quality of life. However for economic prosperity, we do not see a linkage with the comment raised, as what is discussed is purely quality of life improvements. Improvement of property values is not a goods movement economic gain as described by the performance measures for this goal. The primary performance measures for economic prosperity are jobs and output created or preserved.</p>
City of Berkeley	<p>Page 2-4; ID C11 Freight Corridors Community and Impact Mitigation Initiative This program was given no rating for innovation or economic prosperity. However, the description of the program in Section 9.16 characterizes it as a departure from the traditional approach of tying mitigation to a</p>	<p>Agree with points made however the benefits described are quality of life benefits. Innovative approaches are in general of an operations nature, and not programmatic. An economic benefit would mean it increases number of jobs and/or output.</p> <p>However, this project is already part of the priority package and</p>

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	<p>particular source of pollution or a specific project. Also, the program would promote economic development by providing funding for mitigation treatments that could allow development projects to proceed in otherwise limited locations. The program therefore should be given a rating of at least medium each for innovation and economic prosperity.</p>	<p>thus we agree it is a high priority.</p>
<p>City of Berkeley</p>	<p>Page 2-4, 2-8; ID C12, E7 Develop/Support Workforce Training Programs for Goods-Movement Related Jobs This program was given no rating for economic prosperity. However, it would support local economic development, particularly in chronically distressed communities, by providing training for relatively well-paying jobs that require little formal education. The program therefore should be given at least a rating of medium for economic prosperity.</p>	<p>This was a mistake and it should get a rating for economic prosperity. We will edit this.</p>
<p>City of Berkeley</p>	<p>Page 2-5; ID S4 Freight Guidelines for Complete Streets Initiative This program received a medium rating for interconnection/multimodalism, a low rating for safety/reliability and quality of life, and no rating for innovation or economic prosperity. The program, however, is specifically intended to promote the multimodal functioning of streets in order to improve safety, efficiency, and quality of life in urban areas. It therefore should receive a high rating for interconnection/multimodalism and medium ratings for safety/reliability, quality of life, innovation, and economic prosperity.</p>	<p>We agree with the suggested changes in ratings on interconnection, safety and quality of life after rechecking.</p> <p>In terms of economic prosperity, it does not really increase jobs or output.</p> <p>The program was already rated as overall high priority so there is no substantive change.</p>
<p>City of Berkeley</p>	<p>Page 6-17, Table 6.25 The I-80/Ashby Avenue Interchange Improvement Project should receive a high overall rating for reducing truck crashes because roundabouts, which are proposed to be constructed as part of this project, have a high safety benefit. The use of the roundabouts in the interchange area, off the freeway, should not keep this project from having a high safety rating, as the location will serve trucks</p>	<p>The reason for a low score on crashes is because the location currently is not a high truck-involved crash location viewed from a countywide perspective. Therefore though the improvement will likely be effective, the importance of need is low. In other words, the location is not a critical crash location.</p> <p>We agree with the point on connectivity however per our guidelines, given that a connection already exists, the new project</p>

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	<p>getting on and off the freeway. (Ashby is a truck route.) Moreover, the Goods Movement Strategy is intended to improve not only the safety of freeways, but that of local streets and interchanges as well. In addition, the I-80/Ashby Avenue Interchange Improvement Project should receive a medium overall rating for connectivity given that it connects to the West Berkeley industrial area.</p>	<p>will only improve an existing connection – thus receiving a low score.</p>
City of Hayward	<p>Tennyson Road Grade Separation – Table 4.5 mentions no recorded crashes at the crossing. However, it might be misleading to just look at crashes at the crossing. There have been a few crashes within 100 feet of the crossing that should also be considered (although I do need to look into it to see if any of them were truck related)</p>	<p>It will be good if you can provide the data to show they are indeed truck related. Also it would be important to know that they are rated to the actual grade crossing.</p>
City of Hayward	<p>Winton Avenue Interchange, Page 6.5 Travel Time Delay: Highway – Table 6-2 identifies this location as minimal truck delay on highway. However the I-880 NB/SB Auxiliary Lane Project between A Street and Winton I/C is identified as high delay section (table 6-7). The problem here seems to be that Winton I/C is being looked at in isolation. There are some significant queuing issues that result in off-ramp queuing from Winton I/C extending onto the freeway. Improving the ramps here and providing direct Southland Mall connection is anticipated to significantly reduce off ramp queuing and also help the bottleneck section on I-880 between A Street and Winton I/C.</p>	<p>We made an error here and the local does have moderate levels of delay. We have edited the evaluation and as a result it bumped up the project to first priority.</p>
City of Hayward	<p>Winton Avenue Interchange, Page 6.5 Connectivity – Winton provides direct connection for trucks to access the northwest Industrial Area, the Hayward Executive Airport and Southland Mall. Each of these land uses attract a significant amount of regional truck traffic. Some improvements along Winton are being constructed as part of the Reliever Route project to address congestion and accessibility issues for trucks going</p>	<p>Based on our project description the new project will reconfigure the ramp and improve connection to the Mall – which is a source of traffic but not significant truck traffic. It is unclear from the project description if the Reliever Route project is a different project and if so, it is not part of this interchange project and is really a local project. More information is needed.</p>

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	into the Industrial Area. Additionally, with the completion of the reliever route project, significant increase in goods movement traffic onto Winton is expected.	
City of Hayward	Safety – Where are you getting the information on truck crashes from?	This is all from the Needs assessment work in Task 3c. The data is from SWITRS that is publicly available.
City of Dublin	<p>Please change the following item on page 6-12 of the Tech Memo to an actual project that is included in the CWTP and the RTP and not just a feasibility study.</p> <p>“This project will perform scoping/feasibility studies to identify potential project alternatives or other measures <u>provide a direct freeway connector for WB I-580 to SB 1-680</u> to reduce truck-involved crashes on the I-580 mainline east of the I-680 interchange. Given that truck-involved collisions on this portion of the freeway is relatively high, this project may ultimately result in good solutions to an existing problem.”</p>	Noted and changed.
Alameda County Public Health Dept	Chapter 9, Programs and Policies, Table 9.1 – I think the guidelines for Resiliency were accidentally copied from the rail crossings measures.	Edited
Alameda County Public Health Dept	Sections 9.11 and 9.12 – I think that these should include an evaluation of Equity, given that crude by rail will mean more risk of derailments, increased rail traffic and noise and other impacts.	Agreed, will add.
Alameda County Public Health Dept	Suggest including a new section on health and equity for the draft plan where the consultants had reliable data to conduct analyses that have been done to quantify emissions reductions/ increases near communities of concern. This would help explain slide 15 (the combined impacts of Port and Rail Access strategies) better.	The performance measures for equity which were emissions that contribute to public health, and proximity to vulnerable community, were presented and agreed upon when the performance measures were presented earlier in the project. While equity impacts are important, we don’t agree that they should have a special chapter separate from all of the other performance evaluations. The report does include quantitative information for impacts of many of the highway projects and some of the operational improvements, and these are reported in the evaluation of equity impacts in those projects. In cases where significant and unavoidable impacts were previously determined

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		<p>in an EIR, no new quantitative analysis was conducted and the projects were automatically rated as having a negative impact on equity. This is how quantitative information is included.</p>
<p>Alameda County Public Health Dept</p>	<p>Chapter 9, Table 9.1 – The guidelines for Assigning Ratings for Jobs/ Output/ Co-Benefits, Land Use Conflicts, Crashes, and Emissions should include an analysis of equity so that the public can assess the impacts, both positive or negative, on low-income communities and those living nearby freight transportation</p>	<p>The performance measure that was agreed upon for equity impacts/quality of life when we presented the performance measures and evaluation methodology did focus on emissions/air quality within a buffer defined by the ARB (see comment above) since this was determined to be an indicator of public health impacts. During subsequent discussions of the evaluation methodology, it was suggested that we also take into account other types of nuisance such as noise and light from freight operations and this has been taken into account (always considering the proximity of the project to communities of concern measured in terms of the buffer distances provided in the report). While we did not evaluate the equity distribution of other impacts, decision-makers do have information on the level of these other impacts based on the ratings and also have information on the proximity to communities of concern. We believe that the distribution of other impacts is likely to be similar to the distribution of air quality impacts as these are all related to the distribution of goods movement activity. Finally, for Jobs/Output/Co-benefits, we have recommended the inclusion of job-training and workforce development programs to ensure that benefits of additional logistics and transportation jobs are broadly distributed.</p>
<p>Alameda County Public Health Dept</p>	<p>Recognizing that ACTC may not have full regulatory authority over rail or other modes, it’s hard to see how “balanced” the packages are when the measures and mitigations aren’t tied to projects that are happening and when the measures are not clear about implementation. For example, 9.3 relies on the development and adoption of a separate Plan/ study that will be completed after the anticipated adoption of the Goods Movement Plan. Also, 9.15 has challenges around implementation because this section isn’t written with commitments to ACTC’s role, policies, funding, equipment or an emissions target. I</p>	<p>The question of how all of the strategies in a project can be coordinated when they must be implemented by different agencies and jurisdictions is addressed in some detail in the section describing Next Steps that will be included in the draft Plan. Suggestions that you and other members of the Technical Team and interest groups have provided have been considered in the development of recommended governance structures to ensure tighter coordination of the different strategies that comprise each package.</p>

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	<p>recommend editing these sections with stronger language or developing a really strong and clear implementation plan. This will help ensure the public’s confidence in the Goods Movement Plan.</p>	
<p>Business, Labor and Trade Associations Focus Group</p>	<p>Integration of land use planning with goods movement planning is essential. Incorporating goods movement planning into other planning processes should be a matter of course. A clear process for how the countywide and regional goods movement plans will be integrated into sub-regional and local planning efforts will enhance the value and influence of both plans. How will the Regional Goods Movement Plan relate to the MTC’s Regional Transportation Plan?</p>	<p>We are discussing this in the final plans for ACTC and MTC that shows the relationship with respect to how the plans can be coordinated.</p>
<p>Business, Labor and Trade Associations Focus Group</p>	<p>Opportunity Package #1 has an Alameda County focus. It’s important to highlight which components of the Opportunity Packages and the various strategies are applicable to other counties.</p>	<p>For MTC evaluation, we can definitely make this more explicit. Having said that, Opportunity package #1 is more Alameda County-centric because it is the location of the Port of Oakland and much of the rail infrastructure, which has regional significance. So even though it is in Alameda County, its importance is at a regional level.</p>
<p>Business, Labor and Trade Associations Focus Group</p>	<p>Opportunity Package #1 seems to focus on augmenting rail and reducing truck trips, with the goal of increasing the number of middle-wage jobs. However, rail doesn’t create job opportunities, trucks do. Trucks should have a bigger role in the strategies/ Opportunity Packages instead of a focus on eliminating truck transport.</p>	<p>The jobs focus of Opportunity Package #1 is two-fold. First, the package will create more warehousing and logistics jobs within the Bay Area. Second, by improving the efficiency of the Port overall and making it a more attractive port for shippers to use, it supports the forecasted growth in the most efficient manner possible. This growth will increase trucking related jobs although they may not grow as fast as rail-related jobs would grow. In addition, by using each mode for those freight movements that each does more cost-effectively, it will allow the trucking growth that is forecasted for the region to occur more efficiently. Since many truck drivers are owner-operators and are paid by the load, more efficient highways will mean more truck trips per unit of time and potential for higher incomes for drivers.</p>
<p>Business, Labor and Trade Associations</p>	<p>Congestion management seems to be missing from the strategies. There are references to spot capacity improvements.</p>	<p>All of the interchange projects etc are spot capacity improvements. In the regional evaluation there is also a bundle of projects for corridor enhancement. There are also ITS and</p>

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Focus Group		Integrated Corridor Mobility projects included in Opportunity Package #2.
Business, Labor and Trade Associations Focus Group	There should be a focus on locating indirect services in close proximity to the Port of Oakland to increase jobs while decreasing truck trips.	Phase 1 of the Oakland Army Base redevelopment, which is already underway (and therefore not included in this Plan) does include provisions for indirect services (called “ancillary truck services” in the Oakland Army Base plan) near the Port. Opportunity Package #1 also includes truck services at the Port of Oakland (much of which is already committed to as part of the OAB Master Plan and EIR).
Business, Labor and Trade Associations Focus Group	The title of Opportunity Package 3 should be changed to “Modernize Infrastructure for Bay Area Industries” to include both the traditional/ bedrock businesses and emerging businesses.	Agree and will edit
Public Health, Environmental and Community Organizations Focus Group	The presentation and plan documents should distinguish/clarify that there are 2 ports: Port of Oakland and Oakland Global Trade and Logistics. Only listing the Port of Oakland misrepresents the actual number of facilities.	The commenter is correct that there are two developments occurring at the Oakland Army Base and one is being managed by the Port of Oakland and the other by Oakland Global. Each of these does have its own terminals. The report will be edited to clarify which of these developments each project is associated with.
Public Health, Environmental and Community Organizations Focus Group	What’s the difference between transloading versus distribution centers? Why aren’t distribution centers located at the port to minimize truck trips?	Distribution centers are large warehouses designed to temporarily house products (goods) to be redistributed to retailers, to wholesalers, or directly to consumers. Transloading involves transferring cargo from an international container to a domestic container or trailer. Distribution centers are typically assembled on large parcels of land. Due to the high cost of land near ports and limited highway access, many Bay Area distribution centers are located in the Central Valley.
Public Health, Environmental and Community Organizations Focus Group	Without an actual assessment of the existing conditions in freight-impacted communities, there is no way to evaluate whether the mitigations identified in the strategies will lessen the impacts. For example, there needs to be more analysis of the impacts of adding rail freight to the Oakland and Niles subdivisions. These impacts include traffic congestion and access of emergency vehicles.	We understand the concern that is being raised but don’t feel we can fully satisfy the request. The type of analysis that is beyond the scope of a long range plan. Generally, this would be done as part of a CEQA process in a programmatic EIR. Even if we were to address cumulative emissions, traffic, and safety impacts of all of the projects in a package, stopping short of analyzing cumulative health impacts, it is not possible to do so in this plan because we don’t have quantitative data for all of the projects in a package and thus cannot estimate the net impact of all the

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		<p>projects/programs when considered together. See response to comments by Alameda Public Health Department for additional information on this topic. While we cannot conduct a quantitative assessment of net impacts, we have tried at a project-level to identify all of the negative impacts on communities associated with current and future freight activity near affected communities and to ensure that there are new programs that create the potential to reduce or eliminate these impacts. These new programs would be on top of identified mitigations in the approved EIRs of several of the projects. We have also developed recommendations for a planning and execution approach to link moving forward all of the strategies in a package so that the intent of the package is preserved during implementation.</p> <p>We also note that in response to this comment and discussion during the meeting at which it was provided, we are modifying the rail strategy to emphasize only those aspects of the strategy that would reduce truck traffic in West Oakland (the transloading strategy) and to clarify that other aspects of the rail strategy such as increased domestic intermodal rail service at the Port would require additional study to better ascertain how this affects the distribution of truck traffic in the region. We have since learned that there are clear limitations to the amount of domestic cargo that can be handled at any facilities within the Port and an increase in domestic intermodal cargo handled at the Port could be inconsistent with this limitation. There were some specific suggestions made by members of DDDC for how rail could be used to further reduce impacts on the West Oakland neighborhood that we believe should receive further study along with a few other options. The Port had requested to do a more detailed rail access study and this could provide an opportunity to get into more detail on some of the issues raised. We are recommending that this study be included in the plan.</p> <p>Ultimately, decisions about what cargo should be handled where and what routes into and out of Oakland will be used is a decision that can be made by the private railroads without public input. It</p>

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		is our hope that the strategy laid out in this plan provides sufficient benefit to the railroads and shippers to leverage public investments with private investments and in the process change operations to achieve greater benefits for Alameda County and the affected communities.
Public Health, Environmental and Community Organizations Focus Group	The packages were developed before the evaluation criteria and the evaluation process were discussed. The plan began with lofty goals related to health and equity. However, there is a lack of quantitative analysis on health impacts and the impacts on disproportionality. Funding for mitigation must be tied to goods movement policies to have a meaningful impact on health and equity issues.	The evaluation criteria and evaluation process was presented initially at the time that the performance measures were presented and adopted by the Commission. While the process was refined as it was implemented (based on the specific strategies that were evaluated), it is the same process that was presented originally – before the packages or the strategies were identified. It was always presented as a mix of quantitative and qualitative methods. As noted in the response to other comments, there was a mix of qualitative and quantitative analysis of equity impacts as well. The question of how projects can and will be funded and coordinated during implementation is presented in the draft Plan that is being sent to the Technical Team along with this response to comments.
Public Health, Environmental and Community Organizations Focus Group	The countywide goods movement plan includes a 30-year horizon; it does not show project-specific mitigation. Instead, through the balanced portfolio approach, the plan incorporates health, equity, technological considerations into strategies to address good movement needs.	Yes this is correct.
Public Health, Environmental and Community Organizations Focus Group	It's imperative that Alameda CTC clearly state their role and commitment to strengthening the implementation process and tying funding and policies to project implementation.	This is discussed in the draft Plan that is being sent to the Technical Team along with this response to comments.