

Alameda Corridor-East Construction Authority



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December 6, 2006

Mr. Joseph Cassmassi
Planning and Rules Manager
Planning, Rule Development and Area Sources
SCAQMD
21865 Copley Drive
Diamond Bar, CA 91765

RE: Comments-Draft 2007 Air Quality Management Plan

Dear Mr. Cassmassi:

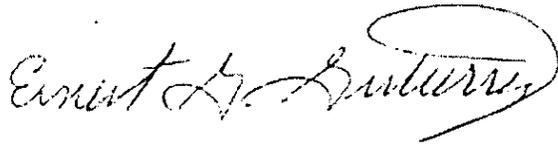
Thank you for the opportunity to comment on the Draft 2007 Air Quality Management Plan. We have reviewed the draft plan and summarized our comments below.

1. We applaud your leadership to establish specific goals for air pollution emission reduction.
2. You requested comment on the potential request for 'bump-up' to extreme classification for the 8-hour ozone with a possible extended attainment date of 2024 for ozone (page 4-1). We support your recommendation and focus on mobile source emissions, especially those involved in goods movement throughout the region.
3. Consistent with your goal as noted above, we recommend that Table 4-2B (Page 4.10) regarding the 'District's Short Term and Mid-Term Stationary and Mobile Source Control Measures Without Emission Reduction Estimates' be amended to include grade separations along the mainline freight corridors through the region. Our preliminary estimates covering 131 grade separations indicate that 288 tons of pollutants per year would be eliminated from idling trucks and autos at blocked crossings (2.4 million vehicles/day by 2020). Experts predict that mainline freight will increase to 250 trains/day by 2020 on a 282 miles of mainline freight corridor in the region. AQMD has supported grade separations as a transportation control strategy contributing to air emissions reduction. However, we recommend that the measure be explicitly listed in Table 4-2B.
4. Consistent with your goal noted above, we request grade separations be clarified on page 4-27 (B) as a TCM project measure.

5. Consistent with your goal above, we recommend that grade separations be included in the 'goods movement' section (Page 4-34) as an emission reduction strategy. We support your target goals; however we believe the goods movement environmental mitigations identified are disproportionately located in the general vicinity of the Ports. The relative lack of attention to other impacted community areas affected by trade growth fails to address the full scope of the current emission problem. The strategy of increasing the share of rail use for containers leaving the Ports will only exacerbate this emission pollution deficiency in the region. The need--and opportunity--to mitigate existing conditions in the communities along the rail corridors east of downtown Los Angeles should be reflected in Table 4-6 (Page 4-40). Two and one-half billion dollars was spent to provide a fully grade separated route (ACTA), with more than half of it depressed below grade, so that the impacts of rail freight movements would be minimized, at least as far as downtown Los Angeles. At its northern terminus, 90% of the train traffic continues east where little has been done to accommodate community impacts in the rest of the region. To make matters worse, more trains are built up in the yards to the north with containers trucked up from the Ports and sent out in the eastbound rail lines.
6. The ACE Construction Authority has determined through independent study that idling trucks/ autos at blocked grade crossings (currently for 20-30 minutes at some crossings) significantly contribute to air pollution for our residents. Further, experts have documented that idling trucks and autos will increase 300% in our communities by 2020. We have commissioned an independent study by air quality modeling experts that has determined we can eliminate 221 tons of air pollutants a year by constructing 21 grade separations along 70 miles of mainline freight track by 2020. San Gabriel Valley cities have unanimously adopted the ACE Project as a way to mitigate the environmental impacts of goods movement on adjacent residents, communities and businesses. Our cities have been working together on this delicate balance for the last ten years when we became aware of the pollution and noise impacts to our residents and businesses caused by blocked crossings. Expanding those air quality emission reductions to the other at-grade crossings along the four-county ACE Project (includes 131 crossings covering 282 miles of mainline freight) would significantly contribute to air pollution emission reduction targets identified in your plan.

In conclusion, the Draft 2007 Air Quality Management Plan does an excellent job of documenting the challenges facing the region. We support your draft plan with the comments noted above and look forward to working with your staff in implementing it. Thank you for your leadership and energy in undertaking this important effort that affects the quality of life for our cities, residents, and businesses. Please feel free to contact Rick Richmond, Chief Executive Officer at (626) 962-9292 should you have any questions or comments.

Sincerely,

A handwritten signature in cursive script, reading "Ernest Gutierrez". The signature is written in black ink and features a large, sweeping flourish at the end of the name.

Ernest Gutierrez
Chairman, ACE Construction Authority
Mayor, City of El Monte

cc: Barry Sedlik, Deputy Secretary BT & H
Barry Wallerstein, SCAQMD