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Date:

03/22/2011 12:17 PM

Subject:

CITY COUNCIL MEETING OF 3/22/11- ITEM #12 (11-0286) ICTF/ZECMS

March 21, 2011

The Honorable Mayor and City Council City of Long Beach, California 333 West Ocean Boulevard Long Beach, California 90802

Honorable Mayor and Council Members;

## RE: CITY COUNCIL MEETING OF 3/22/11- ITEM #12 (11-0286) ICTF/ZECMS

FuturePorts would like to comment on an item before you today to express concern that the significant timeline and cost associated with proposed Zero Emission Container Movement Systems (ZECMS) threaten to overburden important port infrastructure with unfeasible expectations.

FuturePorts' members include businesses and stakeholders from all over California who have an interest in a robust goods movement supply chain. From engineering and construction companies to transportation providers, FuturePorts' members have a vested interest in the ports, as our livelihood depends on the ports, and we are neighbors with the ports. FuturePorts recognizes the San Pedro Bay Ports are regional and national assets, and we advocate for balance between dual needs of economic growth and environmental stewardship. We embrace the philosophy that the Ports must grow, and must grow cleanly. These concepts are not mutually exclusive and must be adopted simultaneously in order to sustain the long-term economic vitality and health of the region.

As you may know, in June 2009, the Ports of Long Beach and Los Angeles, along with the Alameda Corridor Transportation Authority issued a Request for Concepts and Solutions for a Zero Emission Container Movement System (ZECMS) that could meet the drayage requirements of the near-dock railroad facilities located or proposed adjacent to West Long Beach.

An independent panel, lead by the USC Keston Institute for Public Finance and Infrastructure Policy, reviewed all submissions and submitted a detailed analysis and report of the feasibility of ZECMS technology.

For your reference we have attached a copy of the report, a memorandum prepared by the Port of Long Beach staff for the Board of Harbor Commissioners, and a PowerPoint presentation that was given to the Commission in August 2010 by Richard Little, AICP who serves as the Director of the USC Keston Institute.

The report definitely stated that ZECMS technology is not currently feasible and that further study and consideration should only be undertaken after "responders...prove categorically the

reliability and robustness of their proposed system through a "live fire" pilot demonstration under actual operating conditions that would be acceptable to the Ports and ACTA."

The report concluded, "The panel (Keston) does not believe that any of the systems proposed are sufficiently mature to commit valuable port and other public rights-of-way for a full-scale operational deployment at this time. In addition to the previously noted technology risks, the panel also believes that none of the submissions adequately address the risks of insufficient market demand and the possibility that the project cannot be brought to successful commercial and financial close. On this basis, the panel believes that the process (ZECMS STUDY) could be fairly terminated at this time."

We oppose pre-judging the results of the Draft Environmental Impact Report (DEIR) the JPA is preparing. Instead of presuming a need for ZECMS, FuturePorts believes that the City Council should wait until the release of the DEIR, scheduled for release in the third quarter of 2011. At that time the City Council and City Staff can review the document, ensure that all impacts are detailed and that appropriate mitigations measures are adopted, rather than expend scare resources rewriting a study conducted only one year ago.

Thank you for considering our comments.

Sincerely,

Elizabeth Warren Executive Director FuturePorts

