



January 19, 2024

The Honorable Lee Ann Eager
 Chair, California Transportation Commission
 1120 N Street, MS 52
 Sacramento, CA 95814

Re: Support for SBCTA I-15 Express Lanes and Freight Improvement Project Funding Allocation

Dear Chair Eager,

The Mobility 21 Board of Directors strongly supports the I-15 Express Lanes and Freight Improvement Project in San Bernardino County. With the Governor’s climate action goals, our partners have been aggressively moving our transportation systems and fleets to achieve a zero emissions future. The I-15 Express Lanes and Freight Improvements Project and other multimodal improvements on the highway system are not proposed exceptions, and highway maintenance and improvements should not be stigmatized.

Mobility 21 and its members are deeply concerned by the implications of defunding this project when SBCTA has already undergone rigorous evaluation by CTC staff and has met every state and federal statutory and regulatory requirement, including a project-level California Environmental Quality Act (CEQA) review and a system-level CEQA review through the project’s inclusion in the Regional Transportation Plan/Sustainable Communities Strategy.

With environmental stewardship as a core value, our member transportation agencies have been working tirelessly to transform our systems to provide more transit options and a multitude of innovative transportation solutions, while fostering the transition to zero emissions. Our state is connected through the backbone of our highway system, and congestion relief is critical for our communities’ mobility, quality of life, and economic well-being. A well-maintained, safe, and effective highway system is vital to a multimodal transition that will meet our environmental goals without leaving behind the diverse and geographically dispersed communities of California.

This CTC approved project connects two very populous counties with many underserved communities and is also a central piece of our nation’s goods movement system and California’s economy. Over 40% of all goods that enter the U.S. flow through the San Pedro ports, through our local communities to then reach countless homes and businesses across our nation. Goods movement accounts for nearly one-third of the state’s economy, and transportation and warehousing has generated 1 in 4 jobs in the Inland Empire alone (nearly \$1 billion a month in total wages). Southern California’s supply chain and goods movement system is a critical asset to our state and should not be penalized or lose opportunities for system improvements.

SBCTA has followed all state and federal guidelines and requirements to secure \$118.7 million in TCEP funds, and \$83.8 million of SBCTA’s formula share of Local Partnership Program (LPP) and State Transportation Improvement Program (STIP) funds. With the programming of the project, SBCTA has spent \$47 million in Measure I funds to ready it for construction, with an additional \$69 million committed to complete the construction.

The I-15 Express Lanes and Freight Improvement project has met all the requirements set forth by the CTC and should receive the allocation of \$202,567,000 in funds for this shovel ready and regionally significant project to stay on schedule for completion in 2028.

COALITION PARTNERS

Automobile Club of Southern California

Chambers of Commerce Alliance of Ventura & Santa Barbara Counties

Inland Empire Economic Partnership

Los Angeles Area Chamber of Commerce

Los Angeles County Metropolitan Transportation Authority

Metrolink

Orange County Business Council

Orange County Transportation Authority

Rebuild SoCal Partnership

Riverside County Transportation Commission

San Bernardino County Transportation Authority

Southern California Association of Governments


Ventura County Transportation Commission

In keeping faith with its past programming decisions and to its regional partners, Mobility 21 urges the Commission to approve allocation of funds at the January 2024 meeting as we work to build a safe, effective, and clean multimodal future.

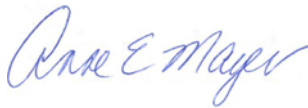
Sincerely,



Paul Granillo
CHAIR
President & Chief Executive Officer,
Inland Empire Economic Partnership



Jeff Ball
President & CEO, Orange County
Business Council



Anne Mayer
VICE CHAIR
Executive Director, Riverside County
Transportation Commission



Danielle Borja
President/Chief Executive Officer,
Greater Conejo Valley Chamber of
Commerce, representing the
Chambers of Commerce Alliance of
Ventura & Santa Barbara Counties



Jon Switalski
TREASURER
Executive Director, Rebuild SoCal
Partnership



Martin Erickson
Executive Director, Ventura County
Transportation Commission



Stephanie N. Wiggins
IMMEDIATE PAST CHAIR
Chief Executive Officer, Los Angeles
County Metropolitan Transportation
Authority



Stephen Finnegan
Manager, Public Affairs and Public
Policy, Automobile Club of Southern
California



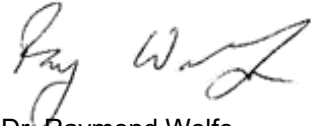
Kome Ajise
Executive Director, Southern California
Association of Governments



Darrell E. Johnson
Chief Executive Officer, Orange County
Transportation Authority



Darren Kettle
Chief Executive Officer, Metrolink



Dr. Raymond Wolfe
Executive Director, San Bernardino
County Transportation Authority



Maria S. Salinas
President & Chief Executive Officer,
Los Angeles Area Chamber of
Commerce

January 23, 2024

California Transportation Commission
Email: ctc@catc.ca.gov

RE: Public comment for the STIP Interstate 15 Corridor Freight Improvement Project – Ref# 2.5s.(5)

Thank you for the opportunity to provide comments on the STIP Interstate 15 Corridor Freight Improvement Project. The Project intends to widen the I-15 freeway over 26 miles from Cajalco Road to Foothill Boulevard. **Figure 1** shows the project, adjacent freeways, and the warehouse footprint within the Inland Empire communities surrounding the project.

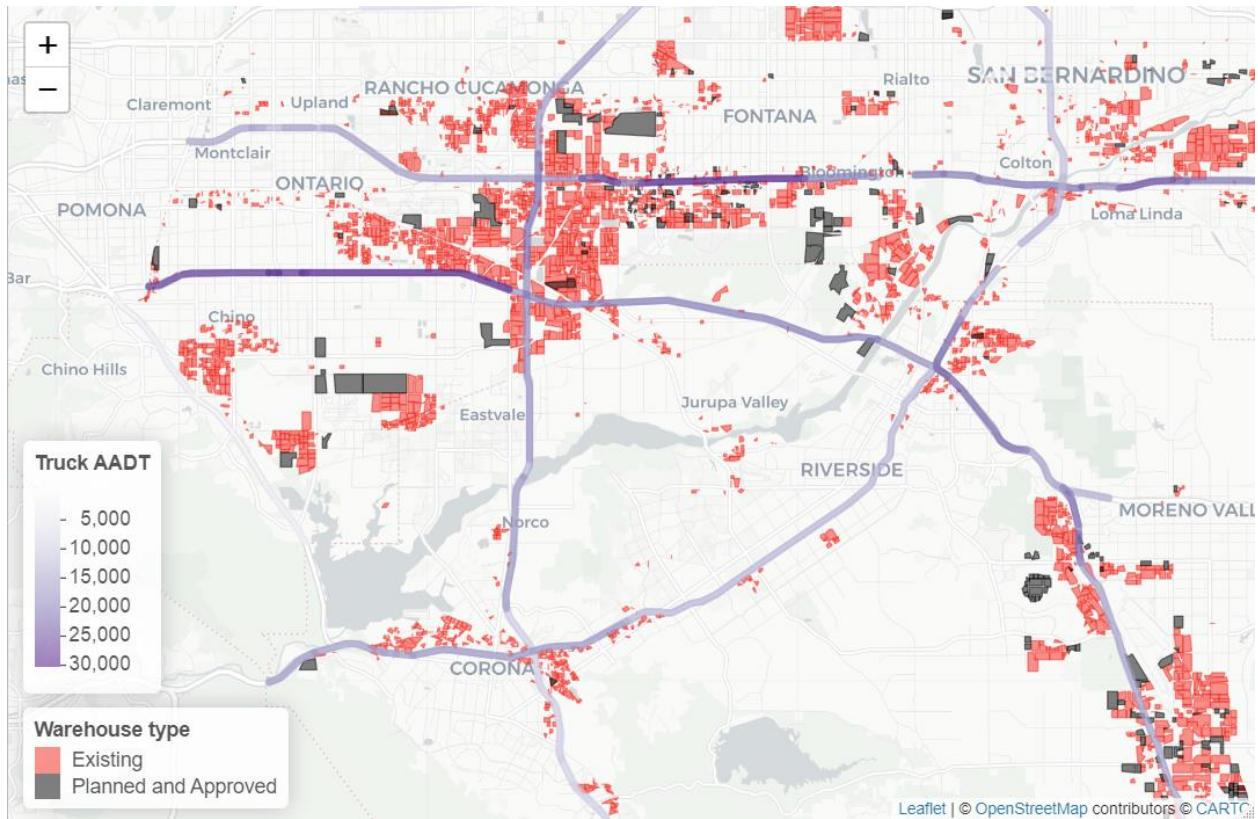


Figure 1 – Map of warehouses in the Inland Empire surrounding the I-15 Freight Corridor Road Widening Project – truck AADT volumes are from Caltrans open data¹. Warehouse locations are from WarehouseCITY v1.18².

The Inland Empire is already the most densely developed warehouse center in the country with over **one billion** square feet of existing warehouses and another **four hundred million** square feet, planned or approved². This project widening the I-15 Freeway will induce increased truck volumes, increased warehouse land-use, delay attainment of the NAAQS, and undermine meeting GHG emission goals. Additionally, it will induce even more disproportionate environmental chemical and non-chemical impacts on the Inland Empire. The only beneficiaries of this project will be multi-national corporations

¹ https://gisdata-caltrans.opendata.arcgis.com/datasets/c079bdd6a2c54aec84b6b2f7d6570f6d_0/about

² <https://radicalresearch.shinyapps.io/WarehouseCITY/>

like Amazon and externally owned real estate investment trusts who are tearing down homes to put up warehouses in our communities. There are over three hundred million square feet of warehouses in the Ontario warehouse giga-cluster, with another seventy million square feet planned or approved within ten miles of the project. Logistics sprawl is proliferating further from the ports leading to increased congestion, pollution, and emissions of GHGs through longer truck VMT to leapfrog developments in the high desert, Banning, Beaumont, Perris, and Menifee.

The most cost-effective, technology-free way to improve air quality, reduce GHG emissions, and avoid exacerbating environmental injustice is to reduce the growth rate of the logistics sector through emissions demand management strategies. This project widens a large stretch freeway with the express purpose of increasing freight volumes for the Goods movement industry. This contradicts numerous state and local policies regarding air quality, greenhouse gas emissions, VMT reductions, and environmental justice concerns surrounding warehouse land-use and major freight corridors. It is consistent with Connect SoCal 2024 and Connect SoCal 2020's dystopian vision of reducing passenger VMT while increasing truck VMT by 43% - more than four times the projected rate of population growth.

1. Air Quality - Goods movement is the most important contributor to Southern California's air quality issues.
 - a. Criteria pollutant exceedances
 - i. Ozone – nation's worst (Extreme nonattainment) with over 100 exceedances of the NAAQS annually – more than 50% of the problem is due to goods movement emissions.
 - ii. PM_{2.5} – Severe nonattainment – direct and indirect contributions to regional PM_{2.5}
 - iii. NO₂ – state nonattainment along SR-60 purely due to high truck traffic from Diamond Bar through Jurupa Valley.
 - b. Ambient inhalation cancer risk – over 60% of total cancer risk from breathing ambient air is due to exposure to diesel particulate matter from goods movement trucks, locomotives, ocean-going vessels, cargo-handling equipment, and construction equipment for these same industries.
2. Housing – land use for goods movement is a nuisance to people and residential communities – warehouses, railyards, ports, and freeway infrastructure are obnoxious land-uses for residential homes, parks, schools. There is active competition for land with homes being demolished for goods movement uses despite the housing crisis.
3. Environmental Justice – Goods Movement facilities are largely placed in lower socioeconomic neighborhoods with lower land prices among communities of color – overriding the objections of the communities living adjacent to them. Studies have shown that warehouses move into communities of color (i.e., follow socioeconomically disadvantaged communities) rather than communities of color moving in afterwards (Yuan, 2018, 2021).
4. Transportation –
 - a. Goods movement competes with people movement on the same transportation infrastructure, impinging on mobility goals. This is disproportionately happening in the Inland Empire where trucks and freight trains use a higher fraction of freeways and rail than passenger vehicles or commuter rail, respectively.
 - b. Goods movement does more damage to infrastructure – heavier vehicles do exponentially more damage to roads and do not pay their fair share to upkeep. This requires higher operations and maintenance costs – again disproportionately impacting the Inland Empire.

- c. Congestion – goods movement facilities are sprawling farther and farther from the ports. Longer truck trips result in higher emissions, more congestion, and more GHGs.
5. Greenhouse gas emissions - Goods movement vehicles are responsible for ~25% of GHG emissions from transportation in SoCal.
6. Goods movement land-use is incompatible with compact development.
 - i. Non-walkable cities
 - ii. Low-density, low-jobs warehouses
 - iii. Can't use alternate modes of transportation for intra-regional goods movement and drayage – requires freeways; only inter-regional goods movement uses rail.
 - iv. Warehouses literally demolishing homes in the Inland Empire to make room.
7. Goods movement (warehousing) is engaging in a pattern of leapfrog development and logistics sprawl – destroying habitat, severing connectivity, and discouraging compact development.

This project will induce all the negative externalities listed and provide limited benefit to local residents. It is a project to subsidize trillion dollar corporations. Please allocate transportation funding to projects that improve the mobility options for residents and stop widening freeways for goods movement.

Thank you for your consideration in this matter.

Sincerely,

Mike McCarthy, PhD, Adjunct Professor of Environmental Analysis

Vice-Chair of R-NOW

Susan Phillips, PhD, Professor of Environmental Analysis

Director of the Robert Redford Conservancy for Southern California Sustainability

Robert Redford
CONSERVANCY
for Southern California Sustainability
PITZER COLLEGE

