

ASSESSMENT OF ENVIRONMENTAL PROCESSES FOR GOODS MOVEMENT INTERIM REPORT

PREPARED FOR:



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Executive Summary

The Assessment of Environmental Processes for Goods Movement was conducted under the direction of the Southern California National Freight Gateway Collaboration (Collaboration). The purpose of the study was to identify roadblocks in the environmental document review process that slows the delivery of goods movement projects in the region. The main component of the work comprised a survey and interviews with resource agencies who are involved in reviewing environmental documents for transportation projects, as well as interviews with project sponsors such as county transportation commissions (CTC) and the Port of Long Beach and Port of Los Angeles (Ports).

Several trends emerged from the survey and interviews such as how to address emerging new requirements, building consensus on the regional goods movement system, and early inclusion of stakeholders. Many of the findings echoed strategies, approaches, and initiatives encouraged by the Federal Highway Administration on moving complex environmental documents efficiently or streamlining the processes. These include early communication, collaboration with project stakeholders, and commitment to project schedules. This summary highlights the themes from the initial effort to allow for a meaningful discussion among the Collaboration members. The intention of optional action steps listed in this summary is to assist the members in further identifying and developing specific approaches to address these issues.

Findings

Issue Area 1: Lack of Coordination and Collaboration

Both resource agencies and project sponsors raised concerns over lack of agency coordination and collaboration, which create government fragmentation and hinder projects from proceeding in a timely manner. Further, extensive outreach and early inclusion of local stakeholders and interest groups in the project development process have proved to reduce the overall



time it takes to complete projects. By reaching out to the communities for their input and incorporating them into project scoping, the project tends to meet the needs of both community stakeholders and the project sponsors.

Optional Action Steps

- Establish early consultation or pre-application meetings with resource agencies to discuss concerns, purpose and need, alternative analysis, technical methodologies, etc. This could minimize agency comments during the environmental document review phase
- Establish regular resource agency/project sponsor coordination meetings to ensure the uniform understanding of the project status
- Collaborate with State and Federal agencies to maintain consistency of review standards
- Coordinate with various resource agencies to receive permits concurrently
- Establish early inclusion of community and interest groups as part of the project development process
- Encourage mutual support for regionally beneficial projects among project sponsors

Issue Area 2: Adequate Level of Technical Analysis and Accuracy

Lack of commonly accepted methodologies to calculate and analyze impacts has prevented project sponsors from conducting consistent impact analyses. This has also impeded resource agencies' decision-making process by requiring a project-by-project review. In addition, frequent emergence of new requirements tends to delay numerous projects. New air quality conformity requirements and lack of clarity regarding what is considered as an adequate mitigation plan have been raised as major factors that slow environmental documentation processes.

Optional Action Steps

- Develop uniform, commonly accepted methodologies and data sources to be used when conducting analysis for the region
- Consult with CEQA and NEPA experts to develop approaches to standardize thresholds of significance



- Define variables that are regionally applicable and magnitude of cumulative impacts
- Obtain a copy of specific guidance documents from resource agencies prior to preparing documents such as species recovery plans, critical habitat designations, final listing rule for species, etc. This would allow project sponsors to address specific needs of resource agencies early

Issue Area 3: Quality of Documents

Many resource agencies identified the lack of relevant information as being one of the major challenges of the document review process.

Optional Action Steps

- Develop checklists/guidelines that would ensure the submission of complete environmental documents
- Provide guidance to project sponsors on ways to ensure an effective and efficient review process
- Allow the inclusion of project benefits, specifically, regional enhancements such as air quality improvements and congestion relief.

Issue Area 4: Staffing Issues

Issues related to staffing were focused on the personnel availability, their knowledge level, and whether a professional relationship between resource agency staff and project sponsor staff was established.

Optional Action Steps

- Identify funding opportunities to support CEQA/NEPA staffing needs
- Encourage and provide continuous CEQA/NEPA training for staff
- Encourage knowledge transfer between senior and junior staff so that the valuable knowledge stays within the agency
- Keep resource agency staff informed on upcoming projects (preferably within the next 18 months) so that they would



be able to allocate resources in anticipation of these projects

Issue Area 5: Review and Permit Sequencing

Many regionally significant transportation projects involve complex analyses, multiple jurisdictions, multiple sensitive habitat areas, thus their environmental clearance processes take a long time prior to permit issuance. Due to the long time between the environmental document review and the permit issuance, the understanding of the project decreases and results in a longer permitting process. The complexity of such projects also highlights the necessity for system level streamlining to increase efficiency and minimize duplication among agencies. This requires identifying what comprises and supports the regional goods movement system.

Optional Action Steps

- Integrate document review and permit process to expedite the review/permitting process
- Identify integrated issue areas to allow for coordinated agency approvals, where feasible.
- Pursue special area designation, possibly backed by an Executive Order, which could potentially assist expediting environmental document review and permit issuance processes for regionally significant goods movement projects.

Conclusion

The Collaboration provides an optimal opportunity for stakeholders at federal, State, and local levels to collaboratively seek solutions to these issue areas. The potential next steps for the Collaboration members to consider are;

- Developing a strategic outreach plan to engage other key stakeholders such as lawmakers
Some of the survey results and interview responses highlighted the need to explore political and legal avenues to streamline the environmental document review process. This effort could include approaching lawmakers for an Executive Order or special area



designation to expedite the environmental review of Southern California goods movement projects based on their significance to the national economy.

- Formulating near-term and long-term approaches to address the issues identified through this effort
Many of the recommendations identified in this report involve developing mechanisms for process improvements, which will require substantial agency coordination and time. , As such, the first recommended step for the Collaboration would be to identify which tasks can be addressed immediately and which will require further effort.
- Identifying how the Collaboration could facilitate stronger relationships among member agencies
Through the interviews conducted for this report, potential outcomes were highlighted, such as, developing approaches to strengthen mutual support among MOU signatories to move regionally beneficial projects forward in an expedited manner.
- Supporting a systems approach to goods movement planning that improves regional project delivery
A regional goods movement system would be a multi-modal system which stretches across numerous jurisdictions in Southern California. Proceeding with such a system would require regional consensus and support for planning, environmental review, and financing. The Collaboration Agreement provides a strong basis for regional support to realize a systems approach for goods movement projects.

