

## Sustainable Freight Action Plan COMMENT

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In reviewing the Sustainable Freight Action Plan, it occurred to me that road infrastructure maintenance activities are not within the scope of the regulation. However, the associated emissions from infrastructure maintenance is non-trivial (CA spends over \$100million/yr on roadways...lots of tar and congestions caused by temporary shutdowns). Counties and cities together spend much more with massive associated emissions. The maintenance schedules are largely dictated by wear and tear rates, which are dictated by the number of ESALs (equivalent single axle loads), which are dictated by truck type and configuration. *Thus, frequency of roadway repair and truck type/configuration are interconnected and as such any policy regarding truck type incentives or economics would optimally be co-beneficial to longer lasting roads.* The relationship between pavement maintenance emissions and truck type policy is well known as it has been studied by governments, academics, and private contractors for several decades. There are copious journal articles, government reports, and books on the subject. One of the world's experts on the issue is right here at UC Davis (Dr. John Harvey).

Conclusion: Any state Sustainable Freight Action Plan should also consider policy implications on pavement maintenance and rehabilitation activities as one hugely affects the other. It would be a shame if new policy aimed at a more sustainable freight system actually made the situation worse.