

**COMMENT ON THE CA SUSTAINABLE FREIGHT ACTION PLAN**  
**by Sally Davis**

The Plan suggests a process for further planning. Instead, policy makers need options for assigning responsibilities to meet established environmental and economic targets within the next 15 years.

Please set goals, establish measureable criteria, and recommend assignments for responsible entities in and out of government.

The Plan neglects explicit targets for improved rail and sea options for freight movement. To the extent that planning and funding reduces the cost and improves the efficiency of trucks, without improving the efficiency of other transportation modes, more freight will shift to trucks. Such shifts would then negatively impact highway capacity that is already stressed. Market forces must not be neglected in the process of planning system improvements.

Please consider the ways that various designs of a “road user charge” could influence goods movement by road, rail or sea, and thereby affect highway congestion.

There is also too little recognition that plans for the year 2030 must place the industry on a trajectory that will meet greenhouse gas reduction targets for the year 2050. It is possible that in order to meet 2050 goals for reduced greenhouse gas emissions, vehicle miles traveled must plateau, and even decline during the next 15 years. It is risky to plan for increases in vehicle miles traveled by trucks in years to come.

Please carefully re-examine all assumptions that depend upon new highway construction.