



February 8, 2016

RE: California Sustainable Freight Action Plan

TO: California Department of Transportation
California Air Resources Board
California Energy Commission
Governor's Office of Business and Economic Development
Other relevant agencies

via email: CSFAP@dot.ca.gov

To Whom It May Concern:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. We applaud Governor Brown's decision to issue Executive Order B-32-15 directing the development of a Sustainable Freight Action Plan for California, and we submit the following comments regarding the development of the Plan:

- (1) Climate change presents a dire threat demanding swift and dramatic change to our freight system. Current targets proposed by staff lack the necessary ambition. In particular:
 - a. A target of 25% improvement by 2030 in "freight efficiency"—measured as greenhouse gas (GHG) intensity of the freight sector, based on the proposed metric—is not sufficient. In fact, any target based solely on GHG intensity of the freight sector is inappropriate. If the Plan is to make significant progress toward a truly sustainable freight system, a broader metric should be developed which incorporates system efficiencies as well—i.e., the ability to meet economic needs more cheaply and with lower emissions by *reducing the need to ship* over long distances. (The US Department of Energy defines "efficient transportation systems" as those which "achieve transportation goals...while reducing vehicle miles traveled."¹)
 - b. A target to "foster future economic growth" in the context of "creat[ing] a positive environment for growing freight volumes" ignores the hard reality that a truly sustainable freight system cannot be achieved without some fundamental changes in the economy it serves. The fact that staff's proposed efficiency target is based solely on GHG intensity and does not incorporate any measure of system efficiency implies an assumption that economic health is premised on growing freight volumes, or that such growth is inevitable. This assumption must be revisited. In fact, a significant reduction in the total ton-miles of freight in the system is a likely precondition for a successful transition to sustainability. In other words, the Plan must support efforts to localize many sectors of our economy, and to transition from a "throw-away" to a re-

¹ Information from the Alternative Fuels Data Center at www.afdc.energy.gov/conservate/system_efficiency.html.



use economy, in order to reduce overall demand for freight transport. These efforts would be in no way contrary to, and in fact would support, the economic mandate in the Executive Order to “increase competitiveness of California’s freight system.”

- (2) All modes of transportation deserve examination in the development of the Plan. In particular, short sea shipping—which has high potential for super-efficient or even possibly zero-emission freight transport—should be given serious consideration. Current staff proposals appear to largely neglect this mode of freight transport.
- (3) While all modes deserve consideration, not all modes can be pursued:
 - a. Development and deployment of new sustainable modes and technologies, even if widespread, will not move us quickly enough toward a sustainable freight system if old unsustainable modes and technologies continue to receive support as well. As with other parts of our energy economy, an “all of the above” strategy can no longer be justified. The state will have to put all of its weight behind truly sustainable freight movement if a new system is to emerge in an acceptable timeframe.
 - b. The current proposal to “investigate the possibility for increased truck weight and/or length” is counter-productive for many reasons. First, it seems clear that our deteriorating roads and bridges cannot handle the toll of more heavy vehicles. Furthermore, investing in infrastructure to accommodate longer and heavier trucks takes money away from strategies which could have a much more dramatic impact on freight system sustainability. Second, added truck weight and length often goes toward features which do not increase freight capacity (such as sleeping compartments). Third, larger and heavier trucks pose significant public safety risks.² Any marginal reductions in freight GHG intensity from larger trucks are not worth the costs of promoting them as a sustainable freight strategy.
- (4) The proposal for a “fix it first” model for infrastructure investment is a wise one. Any funding for *new* infrastructure must be subject to stringent prioritization—avoiding, for example, the longstanding tendency to fund new infrastructure designed specifically for ever-bigger trucks, as noted above. It is also important to note that, due to the long, complex and often opaque nature of the infrastructure funding process, many legacy projects designed to facilitate outmoded and unsustainable freight transportation remain on the books in California. Such projects should be canceled immediately.

Thank you for your consideration.

Sincerely,

Colin Fiske
Campaign Coordinator
Coalition for Responsible Transportation Priorities
PO Box 2280
McKinleyville, CA 95519

² See for example Insurance Institute for Highway Safety. 2015. Large Trucks: Q&As. Online at <http://www.iihs.org/iihs/topics/t/large-trucks/qanda>.