



July 5, 2016

Secretary Brian P. Kelly
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 94814

Secretary John Laird
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Secretary Matthew Rodriquez
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814

RE: Comments on the Draft California Sustainable Freight Action Plan

Dear Secretaries Kelly, Laird & Rodriquez,

The Association of Monterey Bay Area Governments would like to submit comments on the Draft California Sustainable Freight Action Plan (Plan) prepared in response to the Governor's Executive Order B-32-15. We offer the following comments for your consideration:

Comment #1: Recognize the need for infrastructure improvements and additional capacity to relieve congestion in key corridors.

A major factor hindering the efficiency and competitiveness of California's freight system is the result of traffic congestion on key freight routes that have a high percentage of truck traffic. Although new technology holds promise in addressing highway capacity issues, the Plan should recognize that additional lane capacity to relieve congestion in key corridors may be necessary.

Comment #2: Recognize the need for freight funding to comprehensively achieve environmental, efficiency and competitiveness goals.

While the Governor's Executive Order requires the State agencies to develop a unified approach to improve efficiency, zero-emission technologies and competitiveness of California's freight system as a whole, the overarching emphasis of the Plan appears to be on the achievement of environmental goals. The stated goals of the Executive Order are not mutually exclusive. To achieve the desired results, the Plan should provide a framework for future state funding to comprehensively address environmental, efficiency and competitiveness goals.

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Comment #3: Expand the freight system efficiency target to address velocity, throughput and reliability.

As proposed, system efficiency will be measured by the value of gross domestic product in relation to the amount of carbon dioxide emissions from the freight sector. The value of gross domestic product, an economic output, is not a comprehensive measure of freight efficiency. Specifically, it is difficult to determine how efficiency in freight transportation improves by increasing the value of freight moved in and through California while also reducing greenhouse gas emissions. Therefore, a revised system efficiency metric that addresses freight velocity, throughput and reliability in addition to gross domestic product should be developed.

Comment #4: Expand the focus of the Plan to include critical rural freight corridors.

While the Governor's Executive Order requires a unified approach to improve California's freight system as a whole, the Plan prioritizes urban issues and corridors to the exclusion of rural issues and corridors. Most agricultural production is in rural areas, whose economic vitality depends on the ability to transport agricultural goods efficiently. Key rural issues including freight safety, capacity and seasonality are not even addressed in the Plan. In particular, the Plan targets the State's primary trade corridors and the federal Primary Highway Freight System and does not recognize U.S. 101 or the Central Coast's freight system needs.

Comment #5: Identify the impact of recommendations and actions to California's economy.

Given the importance of the freight industry to California's economic vitality and growth, an economic analysis of the actions and recommendations in the Plan is critical for achieving the Governor's Executive Order to increase the economic competitiveness of the freight industry in California, it is important that an extensive economic analysis be completed as soon as possible.

Comment #6: Define "sustainable congestion reduction".

The Plan's Guiding Principles do not define "sustainable congestion reduction". In focusing on freight projects that would avoid greenfield development, this principle actually addresses a land use issue, which is beyond the purview of the plan and not consistent with freight policy related to environmental justice issues. Prior freight policy recognizes the undue impact on communities near freight center, locations where as a result it does not make sense to concentrate freight development.

Comment #7: Identify impacts on future transportation funding decisions.

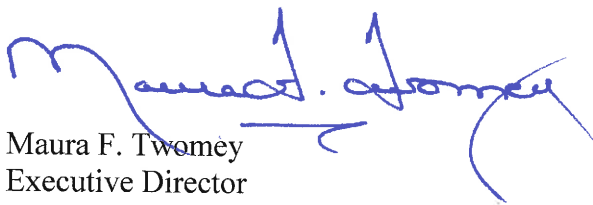
The Plan should clearly identify how the Plan will impact future transportation funding decisions. The Plan should also clarify that it is not intended to replace other programming processes used for selecting and funding infrastructure projects. In addition, any potential criteria should be based on a comprehensive vision for freight infrastructure investment that balances efficiency, technology and competitiveness.

Comment #8: Ensure the consideration of Regional Freight Plans.

It is critical that the Plan acknowledge the importance of freight plans, as well as Regional Transportation Plans and the related Sustainable Communities Strategies, prepared by regional transportation agencies, which address and identify high priority freight corridors and projects in particular regions. Ensuring a common understanding of how the Plan will correlate with these regional planning efforts is crucial to the development of an efficient, integrated and sustainable state freight system.

Thank you for your consideration of these comments and suggestions. If you have any further questions, please do not hesitate to contact me at (831) 264-5100.

Sincerely,



Maura F. Twomey
Executive Director
Association of Monterey Bay Area Governments

cc: Fran Inman, California Transportation Commission
Susan Bransen, California Transportation Commission