



July 6, 2016

SENT VIA E-MAIL

California Air Resources Board
1001 "I" Street, Sacramento, California, 95814

Subject: California Sustainable Freight Action Plan

To Whom It May Concern:

The Sacramento Metropolitan Air Quality Management District (District) thanks the California Air Resources Board (ARB), California Department of Transportation (Caltrans), California Energy Commission, and the Governor's Office of Business and Economic Development for the opportunity to review the Draft California Sustainable Freight Action Plan (Draft Plan). Staff comments follow.

Emissions Reduction Targets

The Draft Plan references Executive Order B-30-15 (EO B-30-15) establishing a 2030 greenhouse gas emissions reduction target of 40 percent below 1990 levels. The Draft Plan's system efficiency target is to "Improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030." The zero emission technology target is to "Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030." Since the freight efficiency target is not stated in the same metrics as the EO-B-30-15, the Draft Plan should indicate how the efficiency standard relates to the 40 percent reduction target.

Further, we suggest that the zero emission technology target exceed existing federal heavy duty fuel economy standards. We suggest that the Draft Plan describe how the target would complement federal standards for deployment of zero emission vehicles and equipment nation-wide, and not just in California.

Corridor System Management Plans

Most major California roadways have adopted Corridor System Management Plans (CSMPs) to improve corridor capacity, which identify sustainable modes to improve roadway capacity including parallel bicycle facilities, enhanced bus service, and other

provisions. Please consider implementing these provisions as a way to manage mainline capacity.

Please contact District staff member Molly Wright if you have any questions regarding these comments. Her contact information is mwright@airquality.org or (916) 874-4207.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. F. Greene". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Larry F. Greene
Executive Director/Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District