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July 6, 2016

Secretary Brian P. Kelly
California State Transportation Agency
915 Capitol Mall, Suite 350 B
Sacramento, CA 95814

Secretary Matthew Rodriquez
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95812-2815

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

RE: Comments on the Draft California Sustainable Freight Action Plan

Dear Secretaries Kelly, Rodriquez, and Laird:

Thank you for the opportunity to review and comment on the Draft California Sustainable Freight Action Plan. It is clear that the several agencies involved have worked hard in developing this document, and there is a lot of valuable information. We offer the following comments for your consideration:

- The Placer County Transportation Planning Agency (PCTPA) is deeply troubled by the freight targets included in Appendix B, specifically the System Efficiency target. As stated, the target is:

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.

While we support improving freight system efficiency 25 percent, the metric used seems counterintuitive. Table B-1 shows that by 2030 it is estimated gross domestic product (GDP) from the freight industry will be \$60,334 million while carbon dioxide emission equivalent (CO₂e) will be 37.48 million metric tons from the movement of freight, resulting in \$1,610 GDP/CO₂e, a 3.8% increase from the 2014 base year of \$1,550 GDP/CO₂e.

The System Efficiency target is suggested as a 25 percent reduction in the GDP/CO₂e ratio from the 2014 base year by 2030. However, this target is counterintuitive, if the freight industry were able to reduce freight related CO₂e to 30.00 million metric tons by 2030 while

still achieving a freight related GDP of \$60,334 million, the GDP/CO2e ratio would be \$2,011 by 2030, a 29.7 % increase!! To achieve a 25 percent reduction in the GDP/CO2e ratio would require that freight related CO2e actually increase to 51.90 million metric tons if freight related GDP remains constant.

As an alternative, the System Efficiency and Economic Growth targets should include metrics such as the average total dollar value of goods movement per day, travel time reliability, speed of freight, throughput of freight, and/or reduction in the number of freight related fatalities on each of the Highway Freight Network and Major Freight Facilities identified in the executive summary of the recently completed California Freight Mobility Plan (CalSTA and Caltrans, December 2014).

- With SB 375, regions have worked hard to develop transportation and land use systems that address air quality and mobility needs within those parameters. PCTPA has carefully selected projects that not only meet our growth and air quality projections, but also support ongoing efforts to expand the economy and provide local jobs, including the development of two new universities. While transit and active transportation are an important part of the transportation system, they cannot address the needs of goods movement. The vast majority of future goods movement will be by truck and additional capacity will be needed along key freight corridors, including Interstate 80 and the Union Pacific Railways between the Bay Area and the State of Nevada.

Specifically, PCTPA strongly agrees with the California Transportation Commission that new technology holds promise in addressing highway capacity issues, but **the California Sustainable Freight Action Plan should acknowledge that additional lane capacity to relieve congestion in key corridors may be necessary.** PCTPA believes that road and rail capacity expansion projects play a critical role in the overall realm of transportation modes to address California's economic vitality and population growth.

- Given the importance of the freight industry to California's economic vitality and growth, an economic analysis of the actions and recommendations in the California Sustainable Freight Action Plan should be completed as soon as possible to increase the economic competitiveness of the freight industry in California.

Thank you for this opportunity to comment on the Draft California Sustainable Freight Action Plan. I ask for your strong consideration of the issues above in the final document. We look forward to effectively partnering to improve the freight transportation system in California. If you should have any questions or need clarifications, please contact me at 530.823.4030 or cmcadam@pctpa.net

Sincerely,



Celia McAdam, FAICP, CTP
Executive Director

CC: Fran Inman, Commissioner, California Transportation Commission
Susan Bransen, Executive Director, California Transportation Commission
Malcom Dougherty, Director, California Department of Transportation
Mary D. Nichols, Board Chair, California Air Resources Board
Robert B. Weisenmiller, Chair, California Energy Commission
Panorea Avdis, Director, Governor's Office of Business and Economic Development