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July 6, 2016

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

RE: Comments on California Sustainable Freight Action Plan Discussion Draft

Dear Secretary Kelly:

The Alameda County Transportation Commission (Alameda CTC) thanks you for the opportunity to review the California Sustainable Freight Action Plan (SFAP) Discussion Draft. Alameda CTC applauds the level of inter-agency coordination involved in preparing this document. Integrating transportation, environmental and economic issues related to freight in one multi-agency policy document is an incredible step forward for the state, and we look forward to continuing to partner with you to advance simultaneous, sustainable improvements in all three areas.

Alameda CTC plans, funds, and delivers transportation improvements of local, regional, statewide, and national significance. Alameda CTC recently adopted a Countywide Goods Movement Plan that identifies projects and programs that support goals of competitiveness, efficiency, and emissions reduction. The Plan was developed in partnership with regional agencies, local communities and jurisdictions, and private sector representatives. Alameda CTC also oversees Alameda County's local transportation sales tax, which contains dedicated funds for goods movement and can leverage federal and state dollars to improve freight efficiency and reduce freight emissions.

Alameda CTC has the following comments on the SFAP Discussion Draft:

Overall Comments:

- **Greater clarity in plan purpose and relationship to other planning and programming efforts is needed:** While we commend the multiple state agencies involved for taking a comprehensive and coordinated approach to a complex issue, additional detail regarding the intended relationship of the SFAP to other recent or ongoing planning, programming and regulatory efforts is critical. It is unclear how the SFAP relates to other statewide planning efforts, such as the California Freight Mobility Plan, the California Transportation Plan, FAST Act implementation, the upcoming ARB mobile source strategy, and Cap and Trade legislative and programming discussions. In addition, Alameda CTC, and many other local and regional agencies, have local

goods movement plans, sales tax programs, and countywide and regional transportation plans, many of which have their own associated principles and performance targets as well as funding plans and commitments. Statewide, regions and counties have been good partners with the State in funding for our transportation needs. Three quarters of transportation funding in the state comes from local agencies: we and our partner agencies have planned, funded and delivered goods movement infrastructure around the state and our local and regional plans address sustainability goals. Clarification as to how the SFAP relates to these efforts, and acknowledging and respecting existing local planning and programming, is appreciated.

- **Identify key recommended actions:** For the plan to deliver on its promise of coordinated policies and programs, a succinct set of recommended actions must be clearly articulated. Establishing a clear set of limited actions can encourage continued agency coordination and active industry engagement, and help target agency and private sector resources, which will be critical for ensuring successful outcomes.
- **Performance metrics and targets:** Additional detail regarding how the performance metrics and targets in the SFAP were developed, how they will be used going forward, and how they relate to other adopted targets and performance measures is needed. While we strongly support performance-based planning, funding and monitoring of the transportation system, it is important that we consider performance metrics and targets in the context of the plethora of other transportation and air quality-related metrics and targets agencies and industry across the state are already using.
- **Economic Growth Target:** Alameda CTC recommends working with the interagency partners and the private sector to develop a specific economic growth target before the plan is finalized. Without a specific target, it will be difficult to measure success and evaluate the efficacy of actions proposed to achieve the goal, particularly given how integral goods movement is to the state's economy and to Californian's livelihoods.
- **Efficiency Target:** Alameda CTC is concerned that the proposed efficiency target does not adequately reflect transportation efficiency, particularly in terms of throughput and velocity. The proposed metric could lead to apparent improvements in system efficiency even if significant bottlenecks remain in the freight transportation system, if cleaner fuels lead to significant decarbonization of freight transportation. Alternatively, the target could be influenced by a changing in the value of goods, rather than actually reflecting increased efficiency, capacity, throughput or environmental sustainability of the system. Additional discussion with industry and the agency partners, many of whom have used metrics to evaluate system efficiency in their local, regional and state plans, is needed to strengthen the target.
- **Consideration of existing regulations and past emission reduction successes:** Across the state, air districts, ports, motor carriers, railroads, marine terminal operators, and other goods movement entities are implementing a variety of technological and efficiency measures to reduce freight emissions. The SFAP should include discussion of how past regulations have succeeded in meeting state goals, lessons learned, and how we can supplement and advance these efforts. The Plan should consider how the numerous regulatory actions will be balanced with economic growth and how benefits can be targeted for those communities most impacted.
- **Focus on freight emissions and technology:** The SFAP focuses significantly on technology, and in particular zero emissions technology, as a primary means to reduce

freight emissions. Alameda CTC strongly supports advancing targeted pilot programs to further the research and understanding of the real-world application of advanced technologies. However, we are concerned that such a laser-focus on zero and near zero emissions technology will leave out other near-term improvements that can be implemented today if funding and policy support were more readily-available. Alameda CTC would also like to see consideration given to operational and infrastructure solutions that could reduce emissions while increasing efficiency.

- **Broaden the range of environmental impacts considered** – As drafted, the plan focuses nearly exclusively on air quality. While air pollution and climate change are extremely important issues in the state and in Alameda County, the plan does not highlight other local community quality of life impacts, such as noise, truck parking, urban delivery, complete streets conflicts, and railroad crossing safety issues. These other issues are brought up frequently in our communities that are most impacted by freight. Alameda CTC recommends including discussion of a broader range of quality of life impacts, and specific action items to reduce these impacts. Alameda CTC encourages you to consider adding a guiding principle that is focused on urban delivery and local quality of life impacts, more broadly than just emissions-related impacts.
- **Trade Corridor Improvement Fund (TCIF) Phase II:** Alameda CTC strongly supports the use of the existing TCIF framework as a vehicle to program future funding for projects that meet Executive Order B-32-15 goals. This framework will build on existing partnerships and ensure that funds flow quickly to major trade corridors. The draft SFAP references establishing additional screening criteria for projects and programs. Alameda CTC encourages the continued use of the existing TCIF process rather than creating new or additional screening criteria and processes. The TCIF program, and the companion Goods Movement Emissions Reduction Program administered by CARB, are proven programs that delivered on improving the efficiency of the state's freight system while simultaneously reducing emissions. Alameda CTC respectfully suggests that the TCIF framework and local and regional prioritization process be used to implement documented freight infrastructure capital improvements, while the local air districts be actively engaged in administering Cap and Trade and other emission-reduction programs, including vehicle and fuels portions of the SFAP.
- **Pilot Projects:** Alameda CTC requests greater discussion of the process and differentiating factors in selecting the three pilot projects. Many local agencies invested significant time and effort in developing innovative ideas to submit. The pilot programs selected, as well as the action items detailed in Appendix C, focus heavily on zero emissions vehicles, intelligent transportation systems, and connected vehicles. We encourage the state to also consider more operational and lower-cost infrastructure solutions to improve the freight transportation system, support local economies, and reduce emissions and quality of life impacts.
- **Economic diversity:** The plan as currently drafted acknowledges the importance of the freight system for the state's economy, but does not articulate the critically important role it plays in providing career opportunities for a diverse workforce. Given the challenges of increased income inequality throughout the state, supporting and improving the competitiveness of California's freight transport system and advancing workforce development opportunities are critically important and should be reflected as such in the plan.

- **Heavily impacted local communities:** The plan includes a significant number of action items aimed at reducing air pollution. As drafted, it is not clear if the action items would be specifically targeted to benefit those communities throughout the state that are most heavily impacted by the freight system. Targeting improvements for those communities currently and historically most-impacted by freight is critically important to ensure meaningful improvements can be realized as quickly as possible.

Comments on specific actions:

- **Policy goals (page 7)** – Alameda CTC strongly supports solid economic analysis to ensure policy makers and government agencies understand the economic implications of their actions. As currently drafted, it is not clear how “completing economic analysis” is a policy goal unless it more explicitly details how the results of economic analysis will be used to guide implementation of the plan.
- **TCIF Phase II proposed criteria:** The third criterion should be amended to read: “...the State’s investments should include technology, ~~and~~ systems, **and infrastructure improvements** to improve the efficiency of freight operations at specific facilities and along freight corridors such that more cargo can be moved with less emissions.” There are many cases where removing a significant freight bottleneck will both improve efficiency and reduce emissions.
- **Action 3.E.4: Bottleneck Relief** – The scope of this action should include not just the freeway system, but also last-mile connector roadways at major ports and intermodal facilities. The latter have a high nexus to improved public health as they can reduce truck idling at locations of significant, concentrated freight activity.
- **Action 3.F: Feasibility Assessment of Developing Dedicated Freight Lanes Along High Capacity Corridors** – Consideration should be given to the potential of repurposing existing lanes as truck-only lanes during non-commute periods Or in reverse commute directions.
- **Action 3.H: Freight Rail Network Improvements** – In addition to improved rail operational efficiency and intermodal terminal capacity, improvements to rail network connectivity and capacity are also needed to realize mode shift from truck-to-rail. Mode shift from truck-to-rail emerged as a particularly promising strategy to improve competitiveness, reduce freeway congestion, and reduce greenhouse gas emissions in the recently-adopted Alameda County and Bay Area Goods Movement Plans.
- **Action 7.A.2: Truck Route Planning** – Truck route planning on local roads and state routes is critically important to many jurisdictions in Alameda County, as truck routes regularly cross city boundaries. Alameda CTC suggests including acknowledgement of the importance of local truck route planning, particularly in corridors serving major freight hubs and paralleling the Primary Freight Network.
- **Action 7.A.4: Truck Parking** – Additional truck parking supply, particularly full-service facilities, is a long-standing need in Alameda County. Truck parking requires funding as cities are reluctant to dedicate valuable land in urban areas to this use. Truck parking could potentially be developed using a public-private model to the extent that services such as food, inspections, showers can subsidize operations.

- **Action 7.B: Freight Intelligent Transportation Systems** – Priority should be given to efforts where there is potential to integrate and leverage ITS deployment within port property to larger regional smart corridor/Integrated Corridor Mobility systems.

Thank you for the opportunity to review the California Sustainable Freight Action Plan Discussion Draft and for consideration of Alameda CTC's comments on this document. We look forward to on-going close partnership with the State as development of a unified freight policy advances.

Please contact Tess Lengyel, Deputy Executive Director of Planning and Policy at tlengyel@alamedactc.org if you have any questions.

Sincerely,



ARTHUR L. DAO
Executive Director

cc:

Caltrans
California Air Resources Board
California Energy Commission
Governor's Office of Business and Development