



Sent via hard copy and email.

06 July 2016

Malcolm Dougherty, Director
California Department of Transportation
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<CFAC@dot.ca.gov>

Dear Mr. Dougherty,

My comments today are in regards to the "[California Sustainable Freight Action Plan](#)" ("Action Plan"), and will focus principally on the design and format of the Action Plan, with some mentioning of the technical content.

In reviewing the Action Plan, it is obvious there is a lot of work still to be done, and I hope TransportiCA's comments assist Action Plan authors with further development.

I. Further Action Plan Development Needed

First, if the Action Plan is to be a major guidance document outlining official integrated state policy, 21 pages of content – including an executive summary – is meager, at best. The recently released Draft "[National Freight Strategic Plan](#)" has substantive content of 127 pages; Air Resources Board's "[Mobile Source Strategy Discussion Draft](#)" and "[Sustainable Freight: Pathways to Zero and Near-Zero Emissions Discussion Document](#)" is 115 and 57 pages, respectively; as well, the final 2014 "[California Freight Mobility Plan](#)" is 256 pages – inclusive of executive summaries, but not appendices.

A 21-page policy document – discussion, or otherwise – does not bode-well in technical and programmatic terms, and may even conjure the idea of "bureaucratic lip service" to external parties and stakeholders.

II. Need for Economic Analysis

Second, in the interest of all parties, I believe it would be wise – and to some degree, possibly litigiously preemptive – if an economic analysis was performed for the Action Plan. Despite the misinformation by Joshua Dolan of Target, and further dramatized by Assembly Member Frazier regarding "MBA students from Claremont McKenna would oversee the analysis as a project,"* an external analysis performed by neutral, third-parties would be ideal, even if the Air Resources Board does not plan to adopt respective regulations. (Further, any verification of the "MBA

students” claim would be appreciated, as well, as no related official document and respective Executive Orders validate such a statement. Continuance of this claim on official record, is not only disingenuous to state policy objectives and those working tirelessly to integrate a myriad of considerations, but it is also insulting to business and public administration scholars who may embrace state service following graduation, as one could argue this and subsequent statements solely denigrate their ability, involvement and education.)

III. Defining Sustainability / Sustainable Freight

Lastly, as a dual-degree MBA / MPA scholar in Sustainable Management, the proposed “sustainable” plan in its draft form is anything, but sustainable.

What is sustainable freight?

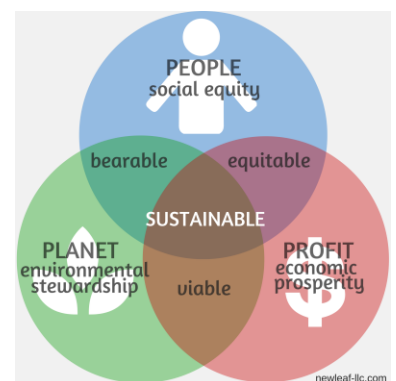
First and foremost, when drafting a major policy or technical document of this nature, the goals of the plan must not only be explicitly stated, but also, most importantly, well-defined, in order for all parties and stakeholders to judge the plan by merits equally understandable and objective.

The plan does not define ANYWHERE – principle document, or appendices – the terms “sustainable,” “sustainability,” and most importantly, “sustainable freight,” nor “sustainable transportation.” With no objective denotation of these terms in the plan, how can any reader confirm, or engage the content as “sustainable,” when nothing exists to provide such designation?

Most applications of sustainability come from the Brundtland Commission’s 1987 report, “[Our Common Future: Report of the World Commission on Environment and Development](#).” From this report, the understanding of “sustainable development” is provided as, “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (41). For transportation, this definition is cast in such context, with an emphasis on renewable energy, and equity for those being served by such transit.

Must include “Triple Bottom Line”

From this lack of a solid and accepted common transportation definition, I have created the following understanding: sustainable transportation is “A mobility form whose inputs (energy) are renewably-based, financial operations are secure and continuous, and outputs (emissions) are negative and/or minimal on the environmental and social systems affected by such mobility” (Justice). Included in the provided definition of sustainable transportation is the integration of John Elkington’s 1994 concept of the “Triple Bottom Line” (*pictured at right*).



Any system – transportation, freight, goods movement, etc. – is considered “sustainable” **ONLY** when its economic, environmental and social equity impacts are thoroughly considered, resulting in a positive balance and mutual benefits among all three elements.

Again, the plan currently provides NO definition of “sustainability” or “sustainable freight.”

Immediate Resources for a Definition

In the section titled “III. State Agency Actions and Pilot Projects” (17), the fifth listed State Agency Action is “Establish a sustainable freight think tank to provide foresight into the innovative future of freight transport and identify the transformative technologies, solutions, partnerships, and critical steps for implementation” (18). It would be ideal to have in the interim a denotation of sustainability, preferably for the final version of the plan, as opposed to waiting on the potential establishment of said think tank. However, in the interim, existing and excellent public resources for declaring such a definition include:

- Air Resources Board’s Transportation and Toxics and Research Divisions;
- Cal/EPA and the University of California’s joint peer-review program, with instant and robust access to academic and professional perspectives and terms;
- Ports of Los Angeles and Long Beach “San Pedro Bay Ports Supply Chain Working Groups,” who have been working on such a charge; as well as,
- Excellent academic institutions and policy centers having expertise on transportation, goods movement and sustainability, such as Berkeley’s Transportation Sustainability Research Center, UC Davis’ National Center for Sustainable Transportation, USC/CSULB’s METRANS Transportation Center, and the Mineta Transportation Institute.

However, at present, there are also amazing resources from the Transportation Research Board recently published regarding just this context – sustainable freight and transportation. The [NCHRP Report 750 series](#) offers two particular incredible publications – [“Volume 1: Economic Changes Driving Future Freight Transportation,”](#) and [“Volume 4: Sustainability as an Organizing Principle for Transportation Agencies”](#) to best assist when creating a sustainable definition / context for freight. The 750 series also offers other volumes, in addition to other sustainability-related elements as social demographics, system uncertainty and resiliency, as well as, unpredictable energy sources.

All of the mentioned research and reports are free to anyone from the Transportation Research Board, and will greatly assist Action Plan authors in developing a common definition of sustainable freight; thereby, providing all the framework to review the Action Plan equally and understandably.

Please feel free to contact me for more information, and thank you for your time.

Sincerely,



Greg Justice
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**Assembly Transportation Committee and Select Committee on Ports Joint Informational Hearing: Update on the Administration’s Efforts to Develop an Integrated Freight Plan (20 June 2016; <http://atrn.assembly.ca.gov/informationaloversighthearings>).*

CC: Assembly Member Jim Frazier, Chair
Assembly Member Eric Linder, Vice-Chair
Assembly Transportation Committee

Assembly Member Patrick O'Donnell, Chair
Assembly Select Committee on Ports

Assembly Member Adam C. Gray, Chair
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