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July 6, 2016

To Whom It May Concern:

Thank you for the opportunity to provide input on the California Sustainable Freight Action Plan (CSFAP or "Action Plan"). The Center for Climate Change and Health is dedicated to tackling the challenge of climate change while creating more vibrant, healthy and equitable communities. Given the complex pathways by which freight both supports and negatively impacts the health of our communities, a public health perspective is critical for the implementation of Executive Order B-32-15. We see support the Sustainable Freight Action Plan as a key strategy to reduce greenhouse gases but encourage you to consider the comments below to further advance health co-benefits. Communities that are most vulnerable to climate change are many of the same communities that are most adversely impacted by freight and other environmental as well as socio-economic impacts.

To this end, we make the following suggestions:

**1. Build more explicit accountability for health costs and benefits into all aspects of the Action Plan.**

While many of the strategies in Appendix C can be expected to support with the stated goal of *"Reducing or eliminating adverse community impacts, including air pollution emissions of particulate matter, nitrogen oxides, greenhouse gases, and other pollutants, especially for communities disproportionately affected by major freight corridors and facilities"* there are some strategies where the health cost/benefits are not clear. For example, several strategies including 3.B.1 (Freight Transportation and Land Use Coordination), 3.F (Feasibility of Dedicated Freight Lanes), and 3.G (Inland Facility, Short-haul Rail Shuttle, Inland Seaports Utilization), would entail a shifting of freight movement, warehousing and distribution to new areas, or expansion of existing right of way. While minimization of community impacts is a stated goal of most of these strategies, explicit analysis of the health impacts of shifting the freight 'footprint' should be conducted to ensure that siting of new facilities and/or expansion of infrastructure will lessen or eliminate and not simply shift the burden of impact.

Several possible mechanisms exist to ensure that health impacts are more explicitly incorporated into the proposed strategies:

- **Make health explicit in the Action Plan Vision and/or Guiding Principles.** The third guiding principle could be edited to read: *“Reducing or eliminating adverse community [ADD ‘and health’] impacts.”*
- **Ensure public health agencies/practitioners are collaborators in the Action Plan.** Though the California Department of Public Health (CDPH) was not mentioned explicitly in Executive Order B-32-15, CDPH, local health departments, or regional health department collaboratives (such as the Public Health Alliance of Southern California and BARHII) should be consulted in the implementation of the strategies proposed in Appendix C. Public Health Departments are not only aware of and able to articulate the health impacts being experienced by communities, but can also assist in connecting implementing agencies with health cost/benefit analysis resources, metrics and tools for health monitoring, and recommendations for strategy-specific performance measures. We recommend developing the Handbook for Freight Facility Siting, Design and Operations (3.B.2) in close collaboration with Public and Environmental Health Practitioners. To advance the incorporation of Public Health Concerns into the strategy and its implementation, we recommend establishing a Public Health practitioner to represent public health concerns on the California Sustainable Freight Advisory Committee.
- **Provide funding for analyzing the health benefits and costs for strategies that may involve expanding or shifting the freight ‘footprint,’ including many of the strategies listed under Action 3.** While many of the strategies proposed in Appendix C are likely to prove beneficial from a public health perspective, some strategies—such as those which expand or shift the footprint of freight in the region, may result in significant localized impacts. Analyzing cost/benefit tradeoffs from a public health perspective can optimize the design of these programs. An analysis of Public Health costs and benefits takes a broader view than air quality or hazardous substance impacts alone, weighing the potential health gains associated with new employment opportunities against potential health impacts, such as the accessibility of critical destinations, air quality, noise, opportunities for physical activity, etc. This broader analysis may be more reflective of the lived experiences of community members, who in their own lives must weigh the benefits of job accessibility against the potential risks and exposures of the freight industry. Articulating and publicizing the health costs associated with freight, and with ‘just in time’ delivery in particular, may help establish a greater public awareness of the human costs of these services, supporting more reasonable price structures for delivery. We recommend building information about health costs into Strategy 6, both in terms of building competitiveness data (A) and into the marketing of the freight system (B).
- **Develop a health-specific performance target and/or multiple specific performance metrics to gauge the success of the Action Plan in reducing health impacts.** We commend the three targets currently proposed for the plan. In particular, we think that the proposed efficiency calculation of dividing the value of goods in the freight sector by CO<sub>2</sub>/CO<sub>2</sub>-equivalent emissions from the sector is an excellent step toward building the true cost of the freight sector into the way we articulate its efficiencies. While we support the spirit of the other two targets,

we would encourage the adoption of a performance target related to minimizing the health impacts of freight on communities. While all three targets are related to reducing health impacts and maximizing the benefits to communities, the lack of discussion of the quality of the jobs and the nature of potentially unforeseen impacts on health could mean that the strategy will not actually improve health impacts from freight. Potential targets could include:

- **25% reduction in unhealthy air quality days in the Southern California Air Quality management district.** Given that the freight sector “generates a high portion of local pollution in parts of the State with poor air quality” (p7) and the Southern California Air Quality Management District is a non-attainment area for federal air quality standards, moving this and other areas with freight-related air pollution toward attainment of federal standards would be a significant step toward ensuring the health accountability of the plan.
- **Improvement in self-reported health (California Health Interview Survey data) for zip codes adjoining freight corridors and warehousing districts.** The California Health Interview Survey includes data on self-reported overall health, which is modeled at a zip code level. The benefit of this metric is that it takes into account the attitude of the survey subject and can incorporate a wide range of ‘intangible’ health impacts that might accurately reflect the benefits (employment) and costs (air quality, environmental, accessibility, noise) of the freight sector. Air quality impacts from freight may be experienced far from the corridor itself, and even defining the primary freight corridor may leave off many areas with freight impacts, pointing out the need to include a larger sphere of influence in some cases
- **Percentage reduction in California Health Disadvantage Index (CA-HDI) overall score for census tracts adjoining freight corridors and warehousing districts.** The California Health Disadvantage Index was developed by the Public Health Alliance of Southern California, in collaboration with health departments across the state, with the goal of measuring community health disadvantage from a social determinants of health perspective. It encompasses six domains that are weighted based on their estimated contribution to population health, including a measure of economic wellbeing. Similar to self-reported health, the CA-HDI may present a more holistic estimate of the costs and benefits of major industries on a community than air quality alone, but it also requires the determination of what geography is ‘impacted’ by freight.
- **Integrate research to mitigate health impacts of freight into overall research agenda.** The full health impacts of freight and industry is largely unknown and understudied. The Action Plan should acknowledge this deficiency and identify opportunities to enhance research and understanding around mitigating negative health impacts.

## **2. Prioritize CSFAP investments and to assist communities most affected by freight impacts first.**

Though many communities are impacted by freight, some bear a disproportionate share of the burden. In implementation of each strategy in Appendix C, we encourage the lead agency to analyze which communities are bearing the largest share of the impacts that will be addressed and prioritize implementation to benefit those communities. Tools for identifying the most impacted communities

may vary by strategy. For example, when prioritizing grade separations or multiple tracks (3.H.2. Bottleneck Relief), it may be most appropriate to consider communities whose accessibility to key destinations is most impacted by current freight-related congestion. To identify these communities, Caltrans should draw upon local project prioritization (County Long Range Transportation Plans, local city plans) in conjunction with a measure of community disadvantage and accessibility. Strategies should focus not just on alleviating freight bottlenecks, but on providing a range of transportation options for non-freight travel, allowing residents accessibility in their community through a range of transportation options (transit, walk, bike).

When prioritizing areas for zero emission freight transition, it may make the most sense to use a measure such as CalEnviroScreen, which heavily weights the pollution burden of communities in its scoring mechanism. In some cases, air and pollution impacts are so localized that it is preferable to use direct air quality measurements rather than the modeled impacts used in CalEnviroScreen. Public Health Alliance Analysis of CalEnviroScreen (please see analyses here: <http://phasocal.org/ca-hdi/calenviroscreen-public-comment-letters/>) indicate that many highly disadvantaged communities from a public health perspective are not identified, therefore we recommend collaborating with public health officials to identify additional areas that may be highly impacted by freight but which are not currently identified as disadvantaged by the CalEnviroScreen tool.

In addition to prioritizing implementation in the highest need areas from a geographic perspective, we also understand that implementing agencies may have to choose which of the strategies identified in Appendix C to implement first. We recommend a similar prioritization process, where strategies with the greatest potential public health impact are implemented first. We encourage Caltrans and other implementing agencies to reach out to Public Health professionals in the phasing of implementation for the Action Plan.

### **3. Speed implementation of the plan, using regulatory incentives where necessary.**

Given the severity of freight impacts on health, and the need for near-term emissions reductions in order to achieve the State's greenhouse gas reduction goals, we commend the urgency established by the Governor's Executive Order. Given that there are an estimated 1.5 million trucks on the road at this time, 100,000 freight vehicles and equipment capable of zero emissions operation by 2030 is not likely to help the freight sector meet its GHG reduction targets. We would encourage an even more ambitious implementation timeline for the zero emissions freight transition. Some simpler and lower cost implementation actions—for example, reduction of congestion around weigh stations by the expansion of truck scale technology use (3.E.5) or implementing regulations to reduce truck idling (7.A.4) and implement Off-Hour Pickup and delivery (7.C) could help realize immediate health benefits, and should be front-loaded through the use of regulation.

We recommend similar urgency in addressing the concerns of freight-impacted communities, and would encourage the development of a system for collecting and implementing community ideas for freight impact mitigation. Possible actions include HVAC filtration improvements, installation of double-paned

windows, installation of vegetative barriers, improved air quality monitoring, and tools to enable community members to report and receive follow-up abatement of freight-related nuisances.

**4. Establish mechanisms for community engagement and feedback and response/reporting to ensure that the stated vision of minimizing freight impacts is being realized through implementation.**

In order to ensure that community freight impacts are being effectively addressed through the California Sustainable Freight Action Plan, we recommend the establishment of locally-based freight liaisons who will serve to open a line of communication between freight-impacted communities and state implementing agencies. These liaisons would be the local face of the California Sustainable Freight Action Plan, able to make site visits to respond to hotline complaints related to freight nuisances ranging from idling trucks to noise concerns, air quality/hazardous material impacts, and truck traffic bottlenecks. Where possible, these liaisons should be embedded within the structure of local government or NGO partners, ensuring their accessibility to community members. A basic task of these liaisons will be identifying localized freight impacts, and working to prioritize implementation of the CSFAP to address areas of greatest need first.

We further recommend the development of a community engagement and report-back structure that will outline the tasks/responsibilities of the liaison offices, and ensure a system for addressing freight impact hotspots. We recommend putting these mechanisms in place immediately to establish baseline need and allow for tracking of improvements to health and community impacts as the CSFAP is implemented.

**5. Ensure that the economic opportunities identified in Action 8 are adequately focused on the needs of freight-impacted communities, providing high quality, stable employment accessible to community residents.**

The economic resources and stability associated with high-quality, living wage jobs with advancement opportunities, play an important role in supporting community health. Economic resources can be leveraged for higher quality childcare and educational opportunities, for more time to engage in healthy lifestyle behaviors, and for better quality housing and living environments. However, we are concerned that the jobs created by the freight industry and available to the residents of impacted communities are often low-wage jobs with poor stability and limited opportunities for growth. Often, it seems that concessions are given to the freight industry, and community health impacts are accepted in the expectation that quality jobs will be delivered in return. The perception from many of our freight-impacted communities is that those jobs have never materialized.

We appreciate items A., B., and C. under Action 8, and encourage the state to further build out requirements for local hire and workforce training to ensure that freight impacted communities receive promised economic benefits. Where possible, these requirements should incorporate both public *and* private sector jobs, especially where public funds have been used or leveraged for increase freight volumes. We would further recommend a revision of the wording of Action 8 as follows:

“Convene stakeholders and the California Workforce Development Board to identify and implement steps to ensure that the [ADD “jobs created by the expansion of freight volumes meet the needs of freight-impacted communities and”] the existing and future workforce meets the needs of the California sustainable freight transports system.”

**Thank you for your consideration of our comments.** Please let me know how we can assist you to more directly address the health impacts and benefits of this Action Plan.

Sincerely,

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