



July 6, 2016

To State Agencies Responsible for the California Sustainable Freight Action Plan:

The Riverside County Transportation Commission (RCTC) appreciates the opportunity to offer comments on the Draft California Sustainable Freight Action Plan (Plan). RCTC is the regional transportation planning agency for Riverside County, the tenth most populous county in America, with 2.3 million people, and among California's fastest growing counties. Pursuant to Public Utilities Code §130050, RCTC has responsibility for multimodal regional transportation and administering a voter-approved half-cent sales tax for transportation projects, Measure A.

The Plan and all other goods movement-related initiatives are of heightened interest in Riverside County due to our location as a hub for logistics facilities and transportation corridors serving both the Ports of L.A. and Long Beach and the San Diego border. Growth in freight traffic through California will impact Riverside County perhaps more than any other county due to our geographic location and available land. Local jurisdictions within Riverside County are experiencing high demand for logistics projects to be built, creating important policy conversations within our region regarding land use, the economy, environment, and mobility. Due to the significance of goods movement to all aspects of life in Riverside County, RCTC strongly believes future investments in freight infrastructure need to be well-thought out with the community's needs in mind. Meaningful mitigation must be implemented simultaneously with capacity improvements to the freight system. This is a principle that will ensure that local public health and quality of life are not sacrificed as the global economy expands.

As indicators of the volume of freight that moves through Riverside County, consider the following:

- Seventy-seven percent of goods moving through the Ports of L.A. and Long Beach travel through Riverside County (65 percent by rail and 35 percent on trucks);
- In 2012, heavy-duty trucks traveled 11,642,216 vehicle miles in Riverside County. By 2040, that number is projected to grow to 23,774,674 – a 204 percent increase;
- In 2009, there were 169 million square feet of warehousing space (sum of occupied building space and available for rent spaces) in Riverside County. In the same year, an additional 60 million square feet of undeveloped industrial zoned land was identified as available to be used for future warehousing purposes;

- By 2035, the number of freight trains traversing Riverside County will double. At grade crossings, these trains will result in a 516 percent increase in vehicle delay and 588 percent increase in emissions;
- Large populations live near freight rail lines in Riverside County:
 - 54,975 people live within 1,600 feet of rail crossings and 810,824 people live within 6,400 feet; and
 - Population numbers are higher when calculating the entirety of the rail lines that cross Riverside County.

First, there are three elements of the Plan that RCTC supports and bear mentioning upfront:

1. **Focus on safety.** Rail safety is a priority for RCTC. Therefore, we are pleased the Plan includes action items on Positive Train Control (PTC) and freight/passenger rail conflicts. With two transcontinental rail lines bisecting our urbanized communities, our freight system must prioritize the safety of our residents. RCTC is a member agency of the Southern California Regional Rail Authority (SCRRA) and has made extensive investments in PTC technology, safer rail cars, upgraded crossings, grade separations, and public education initiatives including Operation Lifesaver.
2. **Inclusion of UC-Riverside.** UCR is on the forefront of innovative research pertaining to emissions, technology, and transportation, especially at the Bourns College of Engineering's Center for Environmental Research & Technology (CE-CERT). Recently the California Air Resources Board (CARB) made a historic decision to relocate its Southern California testing facility to UCR, which will make Riverside County one of the greatest knowledge centers on air quality and transportation in the world. RCTC is grateful the Plan's stakeholder engagement was inclusive of UCR.
3. **Focus on workforce development.** Logistics is one of the largest employment sectors in Riverside County and is likely to continue to grow. Despite growth expectations in logistics, Riverside County is anticipated to have the widest jobs/housing imbalance in all of Southern California through 2040. This leads to drastic commute patterns, which degrade the environment, economy, and quality of life of Riverside County. Moreover, the economic recovery from the Great Recession has been slower in the inland region than other parts of California, with wages remaining low. While some advocates will posit logistics growth as *the* economic solution for inland southern California, we remain skeptical that employment in this sector will raise the overall economic standing of Riverside County. The Plan's focus on workforce development is welcomed inasmuch as it leads to tangible education and growth in wage potential for Riverside County residents.

Second, RCTC associates itself with all of the comments submitted by the Southern California Association of Governments (SCAG) and the California Transportation Commission (CTC).

Third, RCTC's specific comments pertaining to many elements of the Plan can be thematically summarized in the following five categories:

- 1. We need funding more than anything else. In the mean time, let's be smart with the money we do have.** State funding for freight projects, rather than additional layers of policy and process, should be the number one priority of the State to achieve sustainable freight goals.

The Plan's repeated mention of the federal Fixing America's Surface Transportation (FAST) Act leaves the impression that this bill, while a major positive step forward for freight funding, could be a game-changer for implementing the State's numerous (and expensive) objectives. As the Plan notes, the FAST Act's formula program will provide California with barely more than \$100 million annually; a drop in the bucket compared to the billions of dollars of *existing* needs. The State should observe caution in assigning too many objectives and administrative contortions to this relatively small pot of funds. Before designing new processes to expend limited federal money, the State should invest all available energy to matching our federal government's action by creating a long-term funding program for freight projects. Until then, the State and all of its stakeholders are best served by utilizing the Trade Corridor Improvement Fund (TCIF), enshrined in state law, as the most efficient and fair process to ensure freight dollars are invested to maximize state and regional goals.

RCTC appreciates funding proposals have been introduced by the Governor and Legislature, all of which include funding for freight projects. Yet, RCTC remains skeptical that a meaningful funding package will materialize in the near future. Until such time, it is imperative to use the limited dollars we have today in the most effective manner. The more the existing pie is divided, the less it will accomplish, and the less clear it will be to the public as to what government is doing with their tax dollars – which ultimately will impede all of our ability to secure a long-term funding solution to our state's infrastructure needs.

- 2. Regions have accomplished a lot; build on it before trying to change it.** The Plan's stated intention of partnering with regions to meet the Plan's objectives should be carried out by building upon existing plans that have already been adopted by regions and by avoiding duplication of analyses, process, and consensus that has been developed over many years.

RCTC appreciates that the Plan acknowledges that multi-agency collaboration is necessary. Metropolitan Planning Organizations (MPOs), Self-Help Counties, and other regional government bodies, have existing plans that – in many ways – align with what the Plan hopes to achieve. In our region, the 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) meets the criteria of AB 32 and SB 375 and contains a great deal of discussion and financial commitments regarding freight planning and projects. The RTP/SCS is in addition to the Multi-County Goods Movement Action Plan, which was completed in 2007 within the SCAG region. Within Riverside County, RCTC also conducted a number of studies and prioritization efforts to guide investment decisions with local sales tax and federal formula funds.

Yet, the draft Plan enumerates many action items for state agencies that are redundant of work already been completed at a regional level or infers that coordination and collaboration isn't already happening.

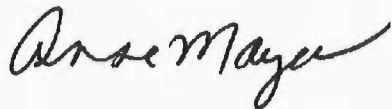
RCTC advises that prior to embarking on any actions proposed by the Plan, Caltrans, CARB, or appropriate agency outreach to MPOs, the Self-Help Counties Coalition, and the California Association of Councils of Governments to inventory and learn from the steps that have already been taken at the regional level. This proactive outreach effort will save resources, time, and lead to more effective implementation of the Plan's goals. RCTC is happy to be a partner in such an effort to collaborate with the State at the outset of any policy or planning initiative.

3. **Addressing criteria pollutants remain critical.** Executive Order B-32-15 discusses the impacts of air emissions on communities and the environment. The Plan seems to emphasize greenhouse gas (GHG) emissions greater than criteria pollutants such as PM 10 and PM 2.5, which are major public health concerns in the South Coast Air Basin. In the worthy pursuit of GHG reduction, RCTC suggests the State place equal emphasis on reduction of all criteria pollutants identified under the federal Clean Air Act. RCTC wishes to again emphasize that mitigation of freight impacts is necessary simultaneous to any expansion of capacity.
4. **Clarify and emphasize the role of the California Transportation Commission.** The Plan frequently mentions four state entities as having a major role in implementing the Plan: CARB, Caltrans, the California Energy Commission, and the Governor's office. Given that the freight system is physically a multimodal transportation system, this begs the question as to what role the California Transportation Commission (CTC) has vis-à-vis the Plan. The CTC has a well-established track record of successfully implementing State policy in a fair manner that achieves necessary balance among stakeholders and objective needs. RCTC encourages the Plan to place a greater emphasis on the role of the CTC.

- 5. The California Freight Mobility Plan is important.** Federal law dating back to MAP-21 advises states to create State Freight Plans and advisory committees. Subsequent state law directs that California heed this Congressional policy direction. The California State Transportation Agency has adopted a California Freight Mobility Plan (CFMP) with the input of a diverse California Freight Advisory Committee. It would seem that a document and advisory body ensconced in law would have precedence and be the focal point for decision-making by the State. Yet, language within the Plan would lead a reader to believe that the Plan will become the primary freight planning document for state agencies. Clarity is needed by the Administration as to the Plan's role related to the CFMP and all other planning documents.

Thank you again for the opportunity to comment on this very important document and policy issue facing California and Riverside County, in particular.

Sincerely,

A handwritten signature in black ink that reads "Anne Mayer". The signature is written in a cursive, flowing style.

Anne Mayer
Executive Director
Riverside County Transportation Commission