

# Memorandum

To: CHAIR AND COMMISSIONERS

CTC Meeting: January 29-30, 2020

From: SUSAN BRANSEN, Executive Director

Reference Number: 4.5, Action

Prepared By: Garth Hopkins  
Deputy Director

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Subject: Commission Comments on the Draft California Freight Mobility Plan 2020

**Issue:**

Should the Commission approve comments for transmittal on the draft California Freight Mobility Plan (CFMP) 2020?

**Recommendation:**

Staff recommends the Commission transmit the attached CFMP 2020 comment letter to the California Department of Transportation (Department).

**Background:**

Federal regulations (49 U.S.C. 70103) require any state receiving federal freight funds to develop a state freight plan. California Government Code Section 13978.8 requires the California State Transportation Agency to prepare a comprehensive freight plan to govern the immediate and long-range planning activities and capital investments of the state. The statewide freight plan must be updated every five years. The plan shall be submitted to the Legislature, the Governor, the California Transportation Commission, the Public Utilities Commission, and the California Air Resources Board. The draft CFMP 2020 is available through the following link:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/freight-cfmp-2019-draft/00-cfmpdraftchapter17final.pdf>

The Department completed the draft California Freight Mobility Plan (CFMP) 2020 in December 2019 and intends to finalize the plan in March 2020. California Transportation Commission staff has completed a review of the draft CFMP 2020 and has prepared the attached letter for Commission consideration.

Attachment:

- Commission CFMP 2020 comment letter

FRAN INMAN, Chair  
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## CALIFORNIA TRANSPORTATION COMMISSION

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January 29, 2020

Mr. Toks Omishakin  
Director  
California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

RE: Draft California Freight Mobility Plan 2020

Dear Director Omishakin:

Thank you for the opportunity to provide comments on the draft California Freight Mobility Plan (CFMP) 2020.

The importance of the freight industry to California's economy cannot be overstated. Former Governor Brown, in his Executive Order B-32-15, highlighted the importance of this industry by finding that the freight sector is responsible for one-third of the state's economy and jobs, with freight-dependent industries accounting for over \$700 billion in revenue and over five million jobs in 2013. Additionally, the Southern California Association of Governments reported that in 2017, goods movement dependent industries employed nearly 2.3 million people (approximately 37 percent of all employees) in their six-county region.

The CFMP is considered a primary source of information for purposes of planning and investing in California's extensive freight network. As required in federal and state laws and regulations, a statewide freight plan should provide comprehensive direction for the

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state's short and long-range planning activities and investments. The plan should also identify and describe the important role that the freight industry provides, both directly and indirectly, to California's overall economy.

The CFMP, upon finalization, will be used to inform critical decisions impacting the state's economy, mobility, air quality, safety, environment, public health and more. As a result, the California Transportation Commission (Commission) is concerned with the delay in finalizing the CFMP since the delay means that the plan will not inform the development of and investments made in the upcoming Trade Corridor Enhancement Program. Given the critical nature of the plan, the Commission offers the comments in the attachment for your consideration.

The Commission recognizes and appreciates the extensive amount of time and effort required to develop the draft plan, particularly given the vast and complex nature of California's freight network. If you have any questions or if we can provide additional information to assist you, please contact Garth Hopkins, the Commission's Deputy Director for Transportation Planning, at (916) 654-4245.

Sincerely,

FRAN INMAN  
Chair

c: Commissioners, California Transportation Commission  
David Kim, Secretary, California State Transportation Agency  
Marlon Flournoy, Chief, California Department of Transportation, Division of  
Transportation Planning  
Nieves Castro, Principal Transportation Planner, California Department of  
Transportation, Division of Transportation Planning

Attachment: Comments to the Draft CFMP 2020

**California Transportation Commission**  
**Comments on the Draft California Freight Mobility Plan 2020**

The California Transportation Commission (Commission) offers the following comments on the draft California Freight Mobility Plan (CFMP) 2020:

**General Commission Recommendations:**

- Review existing freight plans completed by other states for examples of how the collection and display of freight network information and the economic benefits of the freight sector could be enhanced in the CFMP.
- Review current California regionally developed freight plans and regional transportation plans to ensure the CFMP captures relevant information.
- Ensure the CFMP complies with the federal goals as specified in Title 49 U.S.C. Section 70101, and the state statutory requirements as identified in California Government Code Section 13978.8.
- Include references to the appendices throughout the CFMP as applicable. Also include a summary of each appendix to inform how the information is relevant to the overall plan.

**Chapter 1: Vision, Goals, and Objectives**

The CFMP identifies seven high-level goals for California’s freight system. It is important for these goals to be understandable by both transportation professionals and the public. The Commission is concerned that the following two goals do not clearly communicate their respective intent:

Goal 1: Multimodal Mobility - *“Strategic investments to maintain, enhance, and modernize the multimodal freight transportation system with innovative approaches including advanced technology to optimize integrated network efficiency, travel time reliability improvements, and sustainable congestion reduction.”*

Goal 4: Healthy Communities - *“Enhance community health and wellbeing by distributing the benefits of the goods movement system equitably across California’s communities.”*

The definition of “sustainable congestion reduction” and the methodology for “distributing the benefits of the goods movement system equitably across California’s communities” are not included in the plan. Without this information confusion amongst stakeholders is likely.

Commission Recommendation:

- Provide an explanation of the above goals and plan for achievement.

**Chapter 2: California Freight Competitiveness**

Given the freight sector is responsible for one-third of California's economy and jobs, the state's ability to compete both at the international and national level for freight related business is vital. The CFMP is a source of statewide freight transportation information and should contain historical data to illustrate how California ranks in various indicators for market share compared to other states. For example, information setting forth California's strengths and weaknesses when competing for freight related business; the feasible actions the state could undertake to maintain its competitiveness; and additional metrics comparing California freight related activity both internationally and nationally.

Commission Recommendation:

- Include additional data in an understandable format that will readily portray the actions planned to maintain and grow California's freight competitiveness as well as the method to measure and report performance.

**Chapter 3: Existing Freight Assets & System Performance Needs Assessment**

California's existing freight system is extremely complex. The CFMP does not establish a baseline and portray the freight complex system and how each mode is interconnected. In addition, the asset management aspects of the freight system including the plan for maintenance, operations and rehabilitation is not included. In addition, the existing freight assets and location for improvements to the freight system are not identified.

Commission Recommendations:

- Clearly identify and describe California's vast freight infrastructure including, but not limited to, ports, roads/highways, freight rail, airports, and pipelines.
- Include other data to compare California's freight infrastructure with other states. Data from the U.S. Department of Transportation Bureau of Transportation Statistics might be a useful source of information.
- Describe the improvements required to reduce or impede roadway deterioration on the routes that receive a high percentage of heavy truck travel as required by California Government Code Section 13978.8.
- Provide a clear set of performance measures that directly pertain to California's portion of the National Multimodal Freight Network and the overall freight system.

## **Chapter 4: Future of Freight**

Technological advancements such as zero-emission and automated trucks; e-commerce trends and innovations; and increased use of automation for freight loading and unloading will have a major impact on all freight modes and freight logistics. These innovations and trends will also dramatically influence international and national freight infrastructure. This is an extremely important issue that was not given significant attention in the CFMP.

### **Commission Recommendations:**

- Prioritize trends and innovations by near, mid, and long-term impacts to the freight industry. For example, 3D printing may not have a significant impact on freight for ten or more years in the future. However, California is already experiencing impacts from increased e-commerce.
- Consult with experts in the development and application of freight technology and reevaluate this chapter to more substantively identify the possible trends and technological changes that may have short and long-term impacts on California's freight system.
- Consult with the California Department of Transportation Division of Traffic Operations to determine the feasibility of truck platooning in California. Given the current levels of congestion on the freeway system, truck platooning may not be a viable option.
- The wide-range of technological innovations impacting the freight sector that may have a direct impact or benefit to California should also be identified and highlighted.
- Identify a path forward and a role for government to help facilitate the implementation of technology as these changes occur.

## **Chapter 5: Environmental Challenges, Opportunities, and Engagement**

While the CFMP recognizes that there are still areas where freight related environmental and community impacts can be reduced, including information on the progress California has already achieved in minimizing freight impacts would provide helpful context.

### **Commission Recommendation:**

- Identify the freight related emission reductions that have occurred over the past ten years and quantify the level and nature of public and private funding that has been committed to achieve those reductions. Also include a discussion of planned efforts and the funding provided by or anticipated from state and regional government to further reduce these freight related environmental and community impacts.

## **Chapter 6: Implementation**

It is the Commission's understanding that the CFMP 2020 will be amended to include a project list once the Commission programs funding for the Trade Corridor Enhancement Program (TCEP). The next TCEP program of projects is scheduled to be adopted by the Commission in December 2020.

### **Commission Recommendations:**

- Include a discussion of how the project list will be amended into the CFMP following adoption of the TCEP.
- For the 25 objectives, rank each in terms of priority and consolidate or eliminate where necessary to provide for realistic implementation and performance monitoring, evaluation and reporting.
- Identify the responsible organization(s), anticipated implementation timeframe, and estimated cost (if feasible) for each of the objectives. This will serve as a framework for the California State Transportation Agency, the California Department of Transportation, and other transportation partners to undertake near, mid and long-term implementation of the CFMP's objectives.