

U.S. Department of Transportation (USDOT)
Draft National Freight Strategic Plan (NFSP)
Preliminary Comments from
California Department of Transportation (Caltrans)

General Comments:

- Caltrans recommends highlighting the importance and incorporating the needs of Native American Tribes into the NFSP. California is home to more than one hundred federally recognized Native American Tribes, representing nearly 20% of all federally recognized tribal governments within the United States (including Alaska).
- Tribal freight needs typically encompass project coordination and financial assistance for projects such as roadway access, operations, and maintenance. Almost all federally recognized tribes in California have land that is within two miles of State routes. Because terminal access routes are vital to tribal governments engaging in economic development, the NFSP should address freight access to tribal lands.
- In its comments to the USDOT regarding the proposed national Primary Freight Network, the California State Transportation Agency (CalSTA) recommended that the federal freight planning guidance include roadway connections between trust lands and the federally designated freight network similar to the proposed rural freight connectors and conceptual urban freight connectors.
- The NFSP should also describe consultation activities with the nation's tribal governments, as required in Federal regulation, Executive order 13175 and USDOT Executive Order DOT 5301.1.

Executive Summary and Section I. Introduction:

- The NFSP should address the fact that growth in freight tonnage will also impact the volume of last mile pick-ups and deliveries.
- It is suggested that terms and phrases such as “Red Book”, “real oil prices”, “NextGen”, and “BATIC” be explained in greater detail or included in a glossary appendix of the NFSP.
- Although not the focus of this plan, roadways and routes between gateways, borders, ports, and warehouses and the multitude of smaller networks serving the rural areas of the United States (U.S.) should also be mentioned as important links to the freight network and critical to the nation's economic viability.
- With regard to climate change, sea level rise and powerful storms can also greatly impact critical portions of the highway system, especially along coasts, that are critical to freight movement and commerce.
- Consider replacing “storm surges” with “weather events” as extreme heat conditions are not typically caused by storms.

Section II. Key Trends and Challenges:

As the most populous state in the Nation and one of the largest in size, California understandably has a vast, multimodal, multifaceted freight system as well as a notable amount of associated aging infrastructure. Over 175,000 centerline miles of roadway are operated in California in addition to an extensive rail system, 13 ports, around 250 airports, and an immense amount of pipeline. Critically analyzing the system, identifying key trends and challenges, and implementing innovative strategies that increase freight movement capacity with less environmental impacts is critical to our economic health as well as the Nation's.

- With the recent economic downturn, the freight growth forecasts seem high. When Beyond Traffic 2045 is finalized, will the numbers likely be more realistically conservative?

- Suggest including “international ports-of-entry” as a transfer point on page 28.
- On page 38, suggest rewording to, “...funds are substantial, as in the voter-approved California Trade Corridor Improvement Fund Program...”
- We concur that only the Federal government will typically have the resources to assure that an adequate pool of dedicated funding for projects with interstate benefits and that freight planning at the national level must take a systems approach for success.
- With regard to first- and last-mile freight movements, more coordination between non-motorized travel and freight movements is required as implementation of dense smart growth policies are exacerbating truck parking and delivery issues, especially within urbanized areas. Additionally, focused/smart growth is having an impact on land use where historical industrial lands are being converted for uses that may conflict with freight movement businesses. Introduction of incompatible land uses without proper buffer zones may exacerbate first and last mile challenges as well as the environmental impacts (air, noise, and light) often associated with industrial and goods movement lands.
- California produces nearly half of U.S. grown fruits, nuts and vegetables and facilitates importing and exporting of other agricultural products grown nationally and internationally. A way to capture traffic data from industries with seasonal fluctuations is needed to accurately reflect system status and plan accordingly. There is a link between access to sufficient, safe, nutritious food, the economy, and the benefits of an effective freight transportation system.
- Distracted driving should be included among the factors that have accounted for freight transportation accidents.
- NFSP should envision a strategy to improve and uphold freight based safety and environmental standards which cross international borders.
- Resilient international borders require security protections welcoming all legitimate travelers and commerce. New technologies and methodologies are needed to stop unwanted commerce and encourage appropriate commerce.
- In the second paragraph on page 41, under Highway Freight Projects, suggest rewording to say, “Meritorious highway freight projects may go unfunded in favor of projects aimed at local passenger vehicle traffic (such as managed high occupancy vehicle and high occupancy toll lanes), which may restrict freight vehicles altogether.”
- Ever increasing larger ships with immense containerized payloads may lead to a surge of freight traffic on the surface transportation system, especially in areas adjacent to large ports capable of handling these ships. The NFSP should recognize the stresses these vessels may exert on local, regional and interregional surface transportation systems.
- Under the “Escalating threats...” section on page 71, include “rail” among the list of transportation categories that will be challenged by climate change.
- Suggest adding a discussion concerning the expanding role of E-Commerce, three-dimensional or additive manufacturing, new technologies such as drones, innovative services such as “UberCARGO,” and the need for more domestic production to support the President’s National Export Initiative on the goods movement industry. What new paradigms will be coming and how do we plan to incorporate these new ideas?

Section III. Strategies:

Governor Brown recently directed Caltrans and other California State agencies to develop a forward-thinking visionary plan of action to create a more efficient and sustainable freight system. The Order calls for initiation of conceptual projects that will result in freight efficiencies, cleaner air, while remaining economically competitive. Caltrans believes that a well-defined and strategically developed vision to take the nation into the next century is needed. Big ideas to support innovation and new technologies will better sustain the nation than simply maintaining our existing freight system. We believe that an evolution in freight transportation, with

commensurate investment, needs to occur and that this advancement should start with a thoughtful vision. With a vision in place, the system can strive for sustainability in a more concerted, unified effort. Although strategies divulged in this section are good and needed, progress is required to reach a desired, yet distant outcome.

Strategies to Address Infrastructure Bottlenecks:

- A multimodal vision of how freight can be moved more efficiently in the long term with less environmental impacts is needed.
- A focus on domestic freight movement is needed as it provides a high level of return on investment for jobs as well as economic benefits.
- Well-planned, corridor based, truck parking facilities with adequate support services can improve safety by minimizing driver fatigue and reducing congestion and hazards in communities and along roadways.
- Strategies should promote both economic development and address negative impacts of the freight system on local communities, particularly low-income neighborhoods and underserved minority populations.
- Continued long delays at land port of entries may inhibit long term business growth and investment and may effectively constitute a non-tariff trade barrier.
- Environmental enhancements and technologies to reduce use of carbon and nurture greener/renewable fuel sources are needed to enhance freight efficiency.
- Strongly agree that freight research programs should be reestablished and even enhanced to take advantage of emerging technologies and best practices.
- Recommend innovations to streamline the supply chain process through technology, such as cargo scanning for security at borders and intermodal transfer facilities, sharing security information between agencies, and efficiently handling containers as more arrive at ports, intermodal hubs and warehouses.
- Ports and traffic management centers need to be connected through Intelligent Transportation System networks to manage truck traffic from the ports onto the regional and interregional and interstate transportation systems.

Strategies to Address Institutional Bottlenecks:

- A broader, integrated, system-based, visionary approach to guide policies, planning, and project implementation and yet provide flexibility to identify and react to local needs is required. The current autonomy from governmental oversight and control provides benefits in innovation, but lacks connectivity and coordination between systems and creates complications in developing something other than local solutions.
- On page 105, under the “Leverage current research” category, recommend removing the “National Cooperative Freight Research Program” as it was not renewed under the Moving Ahead for Progress in the 21st Century Act (MAP-21).
- Consider adding a 20-year planning horizon to State Freight Plans as a 10-year horizon may be too short for effective and meaningful freight planning.
- Development of Border Master Plans (BMPs) should be encouraged as a strategy to promote bi-national and interagency coordination. First envisioned by the US-Mexico Joint Working Committee (JWC), the BMP approach has been expanded and adapted to other border states and customized to address their needs, resulting in a master planning process for the entire U.S.–Mexico border.
- Future freight strategies will include transfer of goods to smaller trucks for delivery in central business districts and use of innovative Transportation Network Companies (like UberCARGO) for these types of deliveries.
- Ensuring the availability of better data and freight transportation models is critical. Major freight planning decisions are being made with limited robust freight data and methodologies. Data from comprehensive, multimodal detecting, tracking, and performance monitoring systems is needed to inform future models

and plans. Accounting for truck count fluctuations due to season driven industries (e.g. agriculture) is one example of utilizing better data for advanced modeling techniques.

- Suggest adding budget provisions for funding truck traffic counts every three to five years.
- Suggest improved communication among federal agencies involved in intermodal freight. Other governance levels also need to be more coordinated since plans vary substantially from each other in detail and methodology.
- Otay Mesa East can be used as an example of a good project developed via partnerships, which includes tolls to manage demand. Other Public/Private Partnership (P3) strategies could include fiber optic truck lines, pipelines, storm water recycling, electric transmission lines, and solar energy collection.
- As we support automation of the freight system, a shift is needed from labor to more mechanized, technical, and safer employment opportunities. In the meanwhile, the shortage of reliable truckers will need to be addressed as well as workforce education through professional associations and organizations, workshops, webinars, seminars, etc.

Strategies to Address Financial Bottlenecks:

- Funding needs to be permanent, predictable, multimodal, and flexible for freight.
- As more fuel efficient vehicles and equipment enter the market, long-term funding should not solely rely upon fuel taxes or unpredictable funding authorizations.
- Underinvestment in border crossing infrastructure will continue to exist as long as the border projects are required to compete with non-border region projects.

Performance Objectives and Measures:

- In order to create more environmentally responsible, sustainable, and multimodal transportation systems, freight transportation should always be included when establishing goals and methods for measuring performance.
- As truck parking is a widespread national issue, short and long term needs should be a consideration as a measure of performance.

Multimodal Freight Network (MFN):

With the understanding that future freight funding will not be determined by whether or not a project is on the MFN (page 138), Caltrans still recommends the following adjustments.

- An important highway link between the border with Mexico and the San Diego/Los Angeles region was included within the Primary Freight Network (PFN) 27K and 41K networks and needs to be incorporated onto the MFN and map as well. The missing portion of the system links are California SR 111 from Interstate 8 to SR 78 and SR 78 from SR 111 to SR 86.
- SR 99 is not shown in its entirety on the MFN or National Freight Network map. Gaps along the route should be closed at the risk of inaccurate evaluations for route importance.
- Caltrans recommends adding SR 46, and SR 156, and extending SR 152 to the MFN as they are major east-west facilities providing connectivity between the Central Coast and the San Joaquin Valley. SR 46 carries the highest percentage of truck traffic in the region; serves distribution centers and intermodal facilities at intersections with BNSF Railway and Union Pacific rail mainlines; connects with U.S. 101 and Interstate 5, and; is designated on the Strategic Highway Network (STRAHNET) serving movement of military based logistics. SR 152 and SR 156 also provide east-west connectivity between agriculture production, processing and distribution facilities and also directly connect to the Interstate system.
- California can provide updated route data electronically for the State's portion of the MFN, as routes and alignments have changed over time.