

October 25, 2013

Mr. Kome Ajise  
Deputy Director for Planning and Modal Programs  
California Department of Transportation (Caltrans)  
1120 N Street, MS-49  
Sacramento, CA 95814

Re: Comments on the Draft National Freight Policy Recommendations

Dear Mr. Ajise:

Thank you for the opportunity to provide feedback to the National Freight Policy Recommendations. Mobility 21 commends the Department for reaching out to key stakeholders through the California State Freight Advisory Committee (CFAC) for input into the development of these important policy positions. On behalf of Mobility 21, Southern California's transportation advocacy coalition, I respectfully offer some initial suggestions to clarify, simplify, and strengthen the policy recommendations circulated for comment.

While we commented specifically on the policy recommendations circulated for review, we believe the document circulated for comment would benefit from being restructured to provide short, medium, and long-term policy recommendations and a clearer articulation of the mission and goals of the CFAC for a policy recommendation nexus. Due to the complexity of the issues being addressed and their importance to our region, Mobility 21 strongly urges the Department to continue to seek input from stakeholders and use a collaborative process as you refine the policy recommendations, ensuring that the policy recommendations have been thoroughly vetted with both the private sector and with agency staff responsible for developing freight policy. We also urge you to submit your final policy recommendations only once consensus has been reached.

Policy recommendations submitted to The United States Department of Transportation (US D.O.T.) and Congress must ensure California is positioned well for any funding that may be made available in the next bill cycle. Further, policy recommendations should be driven by improving the efficiency, reliability, safety, and capacity of the freight network while minimizing impacts to communities and the environment, and protecting

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jobs. Two important policy areas that were absent in the attached list of recommendations 1) innovation and the use of technology, and 2) system capacity enhancement. There is no doubt that maintaining the system we have is essential, but expanding the system strategically to be able to accommodate future growth is also critically important.

Thank you for your consideration of Mobility 21's suggestions in preparing the final document. We stand ready to provide further input and guidance as the process proceeds.

Best Regards,  
Mobility 21



Marnie O. Primmer  
Executive Director  
Member of the California State Freight Advisory Committee

Cc: Mobility 21 Board of Directors, Mobility 21 Advisory Board  
and Southern California Legislative Roundtable

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## Freight Policy Recommendations for Consideration

### Mobility 21 proposed changes to policy recommendations in RED

There are fundamental elements that must be considered in the process of developing a national freight policy. National freight policy must consider global economic competitiveness and work to promote a sustainable national freight system. **Despite the critical importance of freight movement to our country's economy there are impacts to** ~~Particularly, in California, we must recognize the impact of national freight movement on~~ local/regional economies and neighborhoods **that must be mitigated simultaneously with capacity improvements. Therefore, sustainability is not only about system reliability, efficiency, and safety it is also about stewardship of the system, the environment, and the jobs created through freight movement. Beyond just protecting and fixing the existing system, we also must strategically increase the system's capacity while ensuring that system vulnerabilities and environmental and community impacts are minimized. work to armor elements of the system from vulnerabilities like climate change and other safety and security breaches. In order to make any of these policy considerations a reality, there must be a new reliable, sustainable, and flexible dedicated funding source for freight. There must also be recognition that there are critical hubs in the national freight system that requires a significant share of the nation's investment.** The following are some suggestions for considerations for a national freight policy framework, **respectfully submitted by Southern California, the country's most significant national international trade gateway.**

#### Create Dedicated Freight Fund Sources

- Add a Harbor Maintenance Tax expenditure requirement to utilize funding and not let it sit in the Trust Fund beyond a 20% reserve for emergencies. Expenditures should be 90% return to state of origin, with states **and local/regional agencies** selecting projects following national guidelines.
- Dedicate a percent of Customs fees proportional to amount of revenue generated in the Custom District to implement freight system preservation, maintenance, operations, safety, and security projects in that Custom district. **Note: Mobility 21 recommends specifying the percentage to be dedicated. CFAC should discuss to determine what the appropriate percentage would be.**

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- ~~Enable revenue generating activities at safety rest/truck stops with generated funding reinvested in maintenance, operations, rehabilitation, and expansion of those facilities.~~
- Create a funding program for shortline freight railroads for capital improvements such as improved grade crossings, upgrade of track gauge, and other improvements.
- Create a Freight Program that has dedicated funding, rather than merely making freight projects eligible for existing federal funding at a higher share. The Freight Program **should include a firewall against off-system uses, and be** substantial and targeted to key national priority freight corridors and the full set of multi-modal facilities associated with the corridor.
- **Preserve the critical-Projects of National and Regional Significance program, which has been an important source of funding for freight movement infrastructure improvements.**
- **To the maximum extent possible, expend revenues generated from any new user fees in the corridors where they are collected.**
- **Examine policies that leverage public-private partnerships.**
- **To ensure that the Freight Program is sustainable for the long term, funding sources should ensure that alternative fuel vehicles also pay a fair amount for using the freight system.**

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**Better Definition of National Freight System**

- **Southern California is extremely concerned that the designation of the national freight network in MAP-21 is too narrow and will not accurately reflect the multimodal nature of the freight system. We strongly urge the expansion the primary freight network identified in MAP-21 beyond the currently designated 27,000 centerline highway miles, to include additional state and local connector routes to intermodal facilities such as seaports, **land ports of entry**, intermodal rail yards, and airports with substantial cargo volumes, and other key freight facilities.**

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- Additionally, the Primary Freight Network designation as required in MAP-21 does not appropriately reflect the goods movement system in Southern California where we have a variety of east-west corridors in very close proximity. These parallel options spread truck traffic across several independent highways and thus, counted independently, might not accurately reflect the true traffic counts as compared to parts of the country where traffic is focused on one primary route.

Utilize a corridor approach to analyze truck traffic as opposed to a single-route focus.

- Increase stakeholder outreach by U.S. DOT to better understand state and regional system and community dynamics. Heretofore, opportunities for stakeholder input prior to key U.S. DOT decisions about the freight network have been limited. We strongly encourage U.S. DOT to take a collaborative approach with states and regions during each step of the process.
- Expand the network to include additional state highways and local roads with truck volumes that meet national thresholds.
- Expand the primary freight network to include seaports, railroad facilities, airports, and maritime navigation channels connecting to seaports included in the network, and other key facilities that meet national freight thresholds.

**Community Impact Reduction/Mitigation**

- ~~In addition to~~ **Focus on** the existing air quality attainment requirements, ~~include greenhouse gas (GHG) reductions as a goal of the national freight program and make projects that achieve a specified level of GHG reduction eligible for enhanced federal funding share.~~ ***Note: Mobility 21 recommends removing this clause as it lacks specificity and the level of GHG reduction attainable by freight infrastructure improvements is not likely to be significant. Since our region is so impacted by the air quality standards, this should remain the focus of our efforts.***
- Create federal railroad grade separation program targeted to rail lines on a newly designated priority national freight rail network, similar to priority highway network.

- Emphasize that community impact reductions are eligible uses of federal freight funding. **Note: Mobility 21 recommends specifying the types of eligible projects in this category.**
- ~~Create a truck parking program to increase truck parking opportunities in impacted areas such as along the priority highway network.~~

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**Fix Existing System**

- Policy recognition should be accorded to maintaining the existing infrastructure to sustain the economy of freight movement.
- Set aside funding could be targeted at strategic backbone system elements, such as 100 percent federal funding or priority funding. **Note: Mobility 21 requests that the underlined term be clearly defined and that how projects are prioritized be clearly articulated.**

**Planning**

- Require that freight be included within Metropolitan Transportation Plans.
- Freight Plans should be basis for strategic implementation of national freight policy. MAP-21's requirement for a freight plan allows for a rational discussion of strategic freight needs.
  - **Accelerate freight movement infrastructure project delivery wherever possible once approvals and funding have been secured.**