January 28, 2020

Mr. Toks Omishakin

Director California Department of Transportation

1120 N Street

Sacramento, CA 95814

**Subject: Comments on the Draft California Freight Mobility Plan 2020 from the Rural Counties Task Force**

Dear Mr. Omishakin:   
  
I am writing on behalf of the Rural Counties Task Force (RCTF) representing the 26 rural counties of California regarding the Draft California Freight Mobility Plan (CFMP) 2020. RCTF appreciates the opportunity to serve on the CFMP working group and supports the work Caltrans has put into development of this draft plan. RCTF would like to share the following recomendations for your consideration.

**Seasonal Freight Impacts to Local Roads and State Highways**

Freight throughout rural counties of California differs from goods movement elsewhere. Unlike urban and suburban regions, which transport freight at a stable rate throughout the year, rural freight is highly seasonal and dependent on fair weather for safe passage of vehicles. Harvest season in rural areas occurs in the spring and summer when nearly all agricultural freight vehicles available in the state are concentrated near agricultural sources. This magnifies congestion related to the overlapping tourist season which in turn increases agricultural freight traffic. Furthermore, in highly visited agritourism and recreation areas, goods movement congestion is often compounded by agritourism traffic resulting in not only impeded roadways, but unsafe evacuation conditions.

Recommendation:

* Include a separate section on agricultural freight to discuss its unique characteristics and challenges.
* Include recommendations on seasonal traffic operational interventions to mediate agricultural congestion during peak rural freight transport seasons considering the overlapping agritourism season.
* Include recommendations on mitigation strategies for freight and freight/agritourism congestion regarding severe weather events and evacuation strategies.

**Agricultural Freight Vehicle Clustering Near Product Harvesting, Packing, and Processing Facilities**

The need for freight trucks in rural areas to ship harvested products during peak season results in freight bottlenecks near agricultural harvesting, processing, and packaging nodes. This can cause backups onto highway onramps, offramps, local and interregional roadways, and primary arterials near highways. This results in significant congestion, safety issues, and impacts to local agritourism and other seasonal and recreational economic activities.

Recommendation:

* Identify agricultural harvesting, processing, and packing nodes and the associated freight network affected by seasonal agricultural goods movement congestion.
* Program affected interchanges and parallel routes for improvement.

**Freight Truck Parking Shortage**

A lack of freight truck parking throughout the state compounds challenges with seasonal agricultural freight movement. Agricultural parking inventory is seasonally impacted, causing freight trucks to park illegally near harvest sites. Cities, counties, and the private market have been unable to meet the increasing freight parking demand. This has led to increases in illegal and unsafe freight truck parking throughout the state. A lack of safe and legal parking has also adversely affected the truck driving labor force who are subject to Federal Hours of Services limitations. These limitations require truck drivers to take frequent rest periods, yet California does not have adequate safe and legal parking facilities. This issue especially affects long-haul truckers.

The importance of this challenge calls for additional attention in the CFMP. The CFMP should provide additional recommendations on how to remediate this issue including restoring state managed rest stops with truck parking. While reopening and adding rest stops is not a popular option due to the additional costs to Caltrans, if the state wants to demonstrate a strong commitment to improving goods movement, this is a critical area that must be addressed. The need for additional freight parking is currently addressed in the report in only one paragraph on page 5.B.-7.

Recommendation:

* Expand on the truck parking shortage and provide recommendations on where and how to implement new parking facilities.

**Agricultural Freight Truck Fleet Impacts on Highways in Rural Agricultural Zones**

Agriculture has a unique supply chain where smaller freight trucks transport harvests from the field to processing plants. This seasonal glut of smaller field-to-processing trucks can cause increased safety incidents when entering the exiting highways, especially at uncontrolled at-grade intersections.

Recommendation:

* Provide additional background on agricultural supply chains and how they impact the freight network. Specifically, there is a need to identify dangerous uncontrolled at-grade highway intersections in agricultural harvest zones which are being used by smaller freight trucks, and program these intersections for improvement.

**Interregional Freight Connections**

Chapter 6B separates the state into seven regions. However, these regions are often closely connected through freight movement, supply and demand dynamics, and the needs of high population urban centers.

Recommendation:

* Include additional language to recognize the interconnectedness of interregional freight movements between the rural counties throughout the seven regions.

**Climate Resiliency**

RCTF appreciates that the plan acknowledges climate resilience and projected climate change impacts on the port system. However, rural state highways and interregional and local routes also carry freight throughout California and are threatened by climate change, especially in rural counties.

Recommendation:

* Recognize that many rural state routes and local and interregional routes face significant climate change risk for goods movement and are often within jurisdiction which have little capacity to make improvements to secure the network.

**California’s Freight Network and Economic Benefits**

California’s large economy, expansive freight network and status as a major international importer and exporter define the state. Illustrating these features is key to providing a broad understanding of the statewide freight network and our place in the wider national and global network.

Recommendation:

* Review freight plans completed by other states with similar rural characteristics for examples of how the collection and display of freight network information. Expand on the characteristics and economic benefits of the freight sector.

**General Chapter Comments**

After reviewing the draft CFMP 2020, RCTF would like to echo some key recommendations from the California Transportation Commission’s comment letter dated January 29, 2020.

Chapter 1: Vision, Goals, and Objectives

* Clarify the CFMP goals and how those goals are to be achieved.

Chapter 2: California Freight Competitiveness

* Include an analysis of California’s strengths, weaknesses, opportunities and constraints in freight transportation relative to the other states and the nation. Include illustrative data.

Chapter 3: Existing Freight Assets and System Performance Needs Assessment

* Identify California’s key freight infrastructure and compare and contrast our state’s network with those of other states.
* Describe the improvements required to maintain major freight truck routes.
* Provide performance measures for the freight system that can be used by districts, regions, cities, and counties.

Chapter 4: Future of Freight

* Identify trends in goods movement technology and how technology is expected to develop over the plan horizon.
* Identify the role of government agencies in helping implement new good movement technologies.

Chapter 5: Environmental Challenges, Opportunities, and Engagement

* Highlight the emissions reductions that California has implemented and planned future reductions, including efforts from state and regional government agencies.

Chapter 6: Implementation

* Describe how the project list will be included into the CFMP.
* Provide a more concise list of implementation objectives.
* Add more detail to implementation goals such as a scope, schedule and budget for each one.

RCTF supports and appreciates this significant undertaking by Caltrans. Thank you for the opportunity to provide comments on the draft CFMP 2020.

Sincerely,

Woodrow Deloria

Executive Director  
El Dorado County Transportation Commission

Chair of the Rural Counties Task Force