

California Freight Advisory Committee Meeting Minutes

Details

Date: June 11, 2024

Time: 1:00 p.m. – 4:00 p.m.

Location: Virtual – MS Teams

Meeting Objectives: The objective of the meeting is to provide updates and discuss State freight planning efforts .

Attendees

Facilitator: Caltrans

Scribe: Luke Tia

Attendees: See attachment:
CFAC Meeting-Attendee List

Agenda Items

Agenda Item # 1: Welcome and Housekeeping

Welcome:

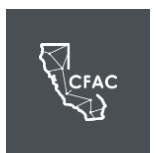
Ann Fox, CFAC Chair, Acting Deputy Director, Planning and Modal

The California Freight Advisory Committee (CFAC) was established by Assembly Bill 14 and aligns with the objectives of the Federal Infrastructure Investments and Jobs Act (IIJA) to involve public and private freight stakeholders and members of the public in shaping the California Freight Mobility Plan and the development of freight transportation initiatives.

Agenda Item # 2: Charging and Fueling infrastructure Program: Tri-state and Port Applications Overview

Presentation:

Riley Keller, Transportation Electrification Program Manager, Caltrans Director's Office of Equity, Sustainability, and Tribal Affairs; Emily Belding, Transportation Electrification Infrastructure Coordinator, Caltrans Director's Office of Equity, Sustainability, and Tribal Affairs; and Sarah Sweet, Federal Liaison, California Energy Commission



Charging and Fueling Infrastructure (CFI) Discretionary Grant Program – Federal funding program under IIJA which supports publicly accessible EV charging and hydrogen fueling infrastructure. Provides a total of \$2.5 billion over 5 years. Two programs: Corridor Program – along designated alternative fuel corridors. Community Program – priorities rural areas, low- and moderate-income areas, and multiunit dwellings. Round 2 Notice of Funding Opportunity (NOFO) released May 30th.

Round 1 Tristate Application with CEC, ODOT, and WSDOT. EV charging and hydrogen fueling stations serving medium- and heavy-duty vehicles on Interstate 5 and key freight corridors. Was not awarded funding but ranked highly. The project was built on extensive planning efforts and stakeholder engagement. They intend to resubmit this application this year.

The National Zero-Emission Freight Corridor Strategy recommends four phases for zero-emission freight charging and fueling development. Phase 1 is to establish infrastructure at key freight hubs between 2024-2027. The CFI application is designed to align with this strategy.

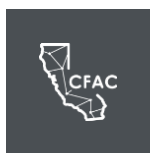
Round two strategy: two separate applications – a “slimed-down” version of the Tri-state Project – aligned with Corridor Strategy Phase 1 Hubs; and a Ports/Drayage Project led by the CEC - focus on key freight corridors serving CA ports. Seeking to identify greatest need, desired charging power levels, desired amenities at sites, configurations needs, and potential locations.

Agenda Item 3: California Freight Mobility Plan (CFMP) 2027 Update

Presentation: Jeff Morneau, CFMP Program Manager, Caltrans Office of Strategic Freight Planning

The CFMP is a comprehensive plan that governs immediate and long-range planning activities and capital investments with respect to freight movement and is required to be updated every four years to be eligible for National Highway Freight Program funds, which in California are part of the Trade Corridor Enhancement Program (TCEP) funds. California State Requirements require a State Freight Plan and to establish a Freight Advisory Committee. The CFMP Scope's content is being updated – must meet 17 federally required elements and an updated freight investment plan (TCEP). The scope update process will involve conducting a robust outreach campaign. The 2027 update will use new goals which come from the Climate Action Plan for Transportation Infrastructure (CAPTI)/California Transportation Plan (CTP) goals. Those goals are the following: Safety, Climate, Equity, Accessibility, Equality of Life and Public Health, Economy, Environment, and Infrastructure. The update will also include a robust discussion on the SB 671 Clean Freight Corridor Efficiency Assessment. Plan will be submitted to FHWA by June 2027

The update will conduct outreach to every stakeholder that has an interest in freight in California, including specifically Community Air Protection Program communities (AB 617) (communities disproportionately affected by pollution), industry, advisory committees, and other groups.

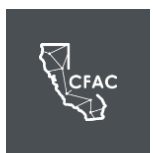


Action Items	Person Responsible	Status	Deadline
Include list of projects in CFMP	Jeffrey Morneau	In progress	June 2027
Send e-mail to districts asking about CFMP outreach activities.	Jeffrey Morneau	Completed	Completed
Look at freight brochure for guiding presentation of CFMP	Jeffrey Morneau	In progress	June 2027

Agenda Item #4: Caltrans System Investment Strategy (CSIS) Update

Presentation: Meenaxi Raval, Caltrans CSIS Program Manager; and Hunter Owners, Caltrans Research Data Manager

The CSIS began as an Interim CSIS which was a qualitative approach, then a Draft CSIS which used quantitative metrics, and will end as the Final CSIS. The Final CSIS will consist of the CSIS and the CAPTI Alignment Metrics, with are considered living documents. The CSIS Investment Framework/CSIS Evaluation has two tiers of evaluation – Program Fit (Program funding and objectives) and CAPTI Alignment Metrics. There are also other subjective considerations such as geographical location, project readiness, deliverability risk, etc. During the 45 day public review period there were 28 respondents and 235 comments, including 9 freight comments. CAPTI Alignment Metrics – developed 11 metrics (9 quantitative and 2 qualitative). Comments on the Freight Metric – more consideration of rail projects in the metric, examples to show alignment with California Sustainable Freight Action Plan, consideration for rest-stops, utilizing slightly different data sources for the truck travel time reliability index calculation, and complaints about transit projects receiving a zero in freight metrics. Metrics (10 points total) split into two 5-point sub-metrics – efficiency and sustainability. Freight Efficiency measures current freight movement with Truck Travel Time Reliability Index while Freight Sustainability measures proportion of capital construction spending on sustainable freight components. CSIS responses and actions performed on CSIS and CAPTI Metrics (clarification on nomination process and evaluation, regulatory context, and metrics clarifications), the CSIS Website (list of Funding Programs and nomination and evaluation flow-chart), and the Post-June Updates (Project Intake Form Update, Program Fit, and 10-Year Multimodal Investment Plan). Future CSIS Update – engage with CFAC on Freight Metrics in sometime between July-September.



Action Items	Person Responsible	Status	Deadline
Add Theresa Dau-Ngo and Andrea Hoff (andrea.hoff@sandag.org) to the CSIS contact list.	Meenaxi Raval	Completed	Completed
CSIS will engage with CFAC to further develop the freight metric further	Meenaxi Raval	In progress	Fall 2024

Agenda Item #5: Port of Long Beach Rail Program Update

Presentation: Mark Erickson, Deputy Chief Harbor Engineer, Port of Long Beach; Bonnie Lowenthal, Vice President, Long Beach Board of Harbor Commissioners; and Theresa Dau-Ngo, Director, Port of Long Beach

The Port of Long Beach is committed to leveraging freight rail as a reliable, efficient, and environmentally sustainable means for transporting cargo at the nation's largest container seaport complex. Recent projects include the Middle Harbor On-dock Rail Yard (2021), the Double Track Access from Pier G to J (2022), and the 4th Track at Ocean Blvd projects (2023). The Port has many federal, state, regional, and industry partners. The Pier B On Dock Rail Support Facility will break ground in the fall and will serve longer trains more efficiently. Its benefits include improved competitiveness; mode shift from truck to rail; improved freight sustainability; revenue, job, and economic growth; and lower emissions. The Port also give community grants and community sponsorships. The Pier B estimated program cost is \$1.6 billion. The following video was shared:

<https://polb.com/port-info/projects/#pier-b-on-dock-support-facility>

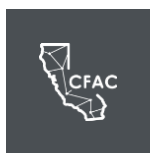
Agenda Item #6: Break

Agenda Item #7: Proposed Rule Rail Yards (PR 2306)

Presentation: Ian MacMillan, South Coast Air Quality Management District (AQMD)

South Coast AQMD is the regional air pollution control district for the greater Los Angeles/Inland Empire Region. Air quality is a big challenge in this region. Smog has improved over time but still needs to improve more to meet Federal air quality standards. Goods movement sources make up about half of all smog-forming emissions in the region. Planning documents created by South Coast – Air Quality Management Plans (regional) and AB 617 Community Emission Reduction Plans (local). Mobile emission sources at rail yards – locomotives, cargo handling equipment, trucks, refrigeration units, and others. The California Air Resources Board and other agencies have a long history of regulation for reducing rail yard emissions.

Proposed Rule 2306 - would address railyard emissions – all mobile source emissions within the fence line and trucks or locomotives traveling to a rail yard. There has been a long public process beginning in June 2017., including feedback. The rule seeks to ensure proportional or greater NOx reductions at facility-level and in our



region relative to reductions throughout California. In conjunction with CARB's In-Use Locomotive and Advanced Clean Fleets regulations, implementation of PR 2306 is projected to reduce over 9 tons of NOx per day. There are three main compliance options – default target, alternative target, and optional compliance pathway.

Agenda Item #8: Agency Roundtable Updates

Roundtable Discussion:

California State Transportation Agency, Dr. Christine Casey, Deputy Secretary of Freight Policy

In anticipation of the competition of all 34 original CAPTI actions by the end of the fiscal year, held listening sessions and sent survey to provide input on use action ideas. Issued Cycle 7 call for projects for the Transit Intercity Rail Capital program. Last year, awarded Port and Freight Infrastructure Program – 1.2 billion dollars.

California Transportation Commission, Kayla Giese, Trade Corridor Enhancement Coordinator (TCEP)

Cycle 4 TCEP applications will be due on November 22nd. The program of projects will be released in June 2025.

FHWA, Cayla McDonell-Encina, Team Lead for Planning and Air Quality in California is attending as the FHWA representative on behalf of Antonio Johnson, Director of Planning, Environment, & Right of Way.

No updates.

Go-Biz; Trelynd Bradley, Deputy Director for Sustainable Freight & Supply Chain

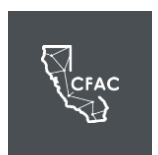
Go-Biz hosted a summit on generative artificial intelligence. Working with ports with their applications for the \$3 billion Clean Ports Program at the US Environmental Protection Agency. The California Competes Program is open for applications every year.

Go-Biz, Angela Shepard, Supply Change Program Manager

The California Containerized Ports Interoperability Grant Program provides grant support to improve the supply chain interoperability of five California ports. It provided \$27 million to the ports in response to the supply chain crisis happening during COVID. Applications were accepted in February 2024. The awards will hopefully be announced in the next coming weeks.

Caltrans, Marlon Flournoy, Chief, Division of Transportation Planning

Ryan Castle has been appointed the Acting Freight Program Support Branch Chief in the Strategic Freight Planning Office. Stephen Yoon has joined Caltrans as lead for Freight Data and Performance Measurement. Thanks to Camilo Juarez for assisting with CFAC meeting for the past year.



Critical Urban/Rural Freight Corridor Designation Guidance will be updated. This helps MPOs, RTPAs, and Caltrans district offices update the National Highway Freight Network. Caltrans prepared a letter in response to US DOT's Request for Information regarding the National Multimodal Freight Network. The NOFO for the US Marine Highway Program is now available. We anticipate the NOFO for the Railroad Crossing Elimination Grant program to come out in June. The Reduction of Truck Emissions at Port Facilities NOFO is also expected to come out in June. Sustainable Transportation Planning Grants will be announced in late June. Updating the Caltrans 25-26 Grant Application Guide. The 25-26 funding cycle will include State-funded Sustainable Communities Competitive and Formula monies, Federal-funded Strategic Partnerships, and State-funded Climate Adaptation Planning Grant Program.

Action Items	Person Responsible	Status	Deadline
Add Cayla McDonnell-Encina from FHWA to the contact list.	Luke Tia	Completed	Completed
Gather information from agency partners roundtable, compile the information into a comprehensive summary and share with CFAC.	Luke Tia	Completed	Completed
Send copy of letter on comments on the NMFN to CFAC.	Kelly McClendon	Completed	Completed

Agenda Item #9: CFAC Member Roundtable

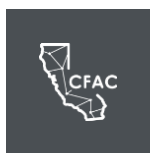
CFAC Member Roundtable Discussion:

Rob Ball, Kern Council of Governments – Almond Pistachio Nut Growing Company will begin shipping containers from Shafter to the Port of Long Beach

Rachel Vandenberg, FuturePorts – Upcoming annual conference - Strong Ports – will be held on Friday, June 21st.

Mariela Rodriguez, SANDAG – Moving into design phase for Harbor Drive 2.0. Finalized the San Diego and Imperial Counties Sustainable Freight Strategy. SANDAG and Caltrans District 11 conducted a briefing on Capital Hill last month on sustainable freight at the border region.

Agenda Item #10: Public Comment / Discussion



Public Comment / Discussion

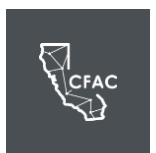
None

Agenda Item #11: Meeting Recap and Adjourn

Public Comment / Discussion

Discussion: Ann Fox, CFAC Chair, Acting Deputy Director, Planning and Modal

Thank you to everyone on the CFAC. The next meeting will be in early Fall.



California Freight Advisory Committee Meeting - Attendee List

Date: June 11, 2024

Time: 1:00 PM - 4:00 PM

Location: Virtual-MS Teams

Name	Organization Name
Adam Crenshaw	Metropolitan Transportation Commission
Aimee Heim	Port of San Diego
Akiko Yamagami	LA Metro
Amanda Fagan	Ventura County Transportation Commission
Andre Freeman	CA Air Resources Board
Andrea Hoff	SANDAG
Angela Shepard	GO-Biz
Ann M Fox	Caltrans
Austin Sos	caltrans
Barry Scott	Coastal Rail Santa Cruz
Bonnie Lowenthal	Port of Long Beach
Camilo Juarez	Caltrans
Catherine Carr	Caltrans
Cayla McDonell-Encina	FHWA
Chris Wilson	Los Angeles County Business Federation
Christine Casey	Caltrans
Cole Iwamasa	Caltrans
Daniel Arellano	Caltrans
Desiree Wood	Nevada DOT
Dianira Soto	Caltrans
Don Norton	California Short Line Railroad
Emily Belding	Caltrans
Hahn Elisabeth	StanCOG
Hang Ivy	OCTA
Hunter Owens	Caltrans
Ian MacMillan	South Coast AQMD

Ishmael Sweeney	Caltrans: California Department of Transportation
Jack Symington	Green Port Energy
Jacob Mike	Pacific Merchant Shipping Association
Jacob Rightnar	Caltrans District 1
James A Shankel	California Department of Transportation
Jeffrey A Morneau	Caltrans
Jesse Graham Robertson	Caltrans
Jesus M Navidad	Caltrans
Jimmy O'Dea	Caltrans
Jose I Marquez-Chavez	Caltrans
Justin Ryder	Quadiant
Kalin M Pacheco	Caltrans
Kao Kenneth	Metropolitan Transportation Commission
Kayla Giese	CATC
Kelly D McClendon	Caltrans
Kelly M Eagan	Caltrans
Kerry Cartwright	Port of Los Angeles
Kimberly Bolyard	Caltrans
Kuker Michael	Shasta Regional Transportation Agency (SRTA)
Lale Tiejiao	Caltrans
Lane Ross	Genesee & Wyoming
Laura Hill	Bay Area Council
Lesser Brandon	Orange County Transportation Agency
Luke Tia	Caltrans
Luna Lorelle	RCTC
Manuel Hurtado	Caltrans
Margaret (TRBL) Park	Aguas Calientes
Mariela Rodriguez	SANDAG
Mark Erickson	Port of Long Beach
Marlon A Flournoy	Caltrans
Mary John	Parallel Systems
Maryam Delavarrafiee	California Air Resources Board

Matthew Yosgott	California Transportation Commission
Maurissa Brown	Greenlining Institute
Mayra Jimon	Caltrans
Meenaxi Raval	Caltrans
Michael Cano	LA Metro
Michael Leue	Alameda Corridor Transportation Authority
Michelle Stewart	Metrolink (SCRRA)
Miguel A Jaller Martelo	UC Davis
Miguel Mendoza	Sacramento Area Council of Governments
Nick St. Cook	StanCOG
Nikki N Tiongco	Caltrans
Orlando Ramirez	Caltrans
Papazian Sophia	California Association of Port Authorities
Paul Bingham	S&P Global
Rafikova Sofia	Coalition for Clean Air
Ranaiefar Fatemeh	Fehr and Peers
Ray Minjares	International Council on Clean Transportation
Reid Boggiano	CA State Lands Commission
Riley Keller	Caltrans
Rob Ball	Kern Council of Governments
Ryan Castle	Caltrans
Sarah Sweet	California Energy Commission
Shana Espinoza	Caltrans
Shanthi Chatradhi	VTA
Sophia Papazian	California Association of Port Authorities
Steven Smith	San Bernardino County Transportation Authority
Theresa Dau-Ngo	Port of Long Beach
Tim Garrett	SANDAG
Tracey M Frost	Caltrans
Trelynd D. Bradley	GO-Biz
Twomey Maura	AMBAG
Vandenberg Rachel	Rheia Consultants

Veronica Coleman

Yatman Kwan

Yihao Xie

Zhongping Xu

Caltrans

Caltrans

The International Council on Clean Transportation

Caltrans D4

California Department of Transportation

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June 12, 2024

Allison L. Dane Camden
Deputy Assistant Secretary for Multimodal Freight
United States Department of Transportation
1200 New Jersey Ave., SE, W12-140
Washington, D.C., 20590-0001

Dear Deputy Assistant Secretary:

The California Department of Transportation (Caltrans) submits the enclosed comments in response to the United States Department of Transportation's Docket Number: DOT-OST-2024-0047, Request for Information on Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network.

If you have any questions, please contact Ann Fox, Acting Deputy Director, Planning and Modal Programs.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Tavares'.

TONY TAVARES
Director

Enclosure

Caltrans Detailed Comments - NFMFN

US DOT Request for Information on Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network

California Department of Transportation (Caltrans) Division of Transportation Planning

California's freight transportation system is the most advanced, environmentally friendly, and multimodal in the nation. This impressive goods movement system provides communities with their most vital necessities including food, medicine, and inputs for manufacturing, in an efficient manner. Improvements focusing on efficiency and reliability in the freight industry will continue to positively impact the economy and California's communities. In an effort to further strengthen these impressive ranks and remain a national leader, California is working towards more efficiency, less pollution, and higher capacity in its freight facilities, equipment, and operations.

As the largest national gateway for international trade and domestic commerce, California strives to have the world's most innovative, economically competitive, multimodal freight system that is efficient, reliable, modern, integrated, resilient, safe, and sustainable, where the benefits of freight are realized while supporting healthy communities and a thriving environment.

The California Department of Transportation (Caltrans) has prepared the following comments in response to the United States Department of Transportation (US DOT) Docket DOT-OST-2024-0047 on the Goals, Criteria, Thresholds, and Measurable Data Sources for Designating the National Multimodal Freight Network (NMFN).

US DOT questions regarding the NMFN Goals:

Question 1: Which of the following purposes is most important to ensuring the NMFN provides a foundation for the U.S. to compete in the global economy and why?

We acknowledge the merit of the following purposes listed by US DOT:

- Assist states and local governments with strategically directing investments towards overall improved freight system performance.
 - Having this as the primary purpose, the NMFN will help to foster a shared alignment of key freight facilities and infrastructure among federal, state, regional, and local entities. The shared agreement on significant freight hubs and corridors will provide guidance for directing multimodal freight investments for enhanced system performance.

- Inform freight infrastructure planning and land use planning by state and local governments and private sector owners and operators.
 - A specific NMFN designation will provide clarity for governments and goods movement stakeholders. Standardizing and defining the critical freight network at a national level will promote consistency for future land use, transportation, and community planning efforts.
- Inform a national, integrated, and multimodal supply chain strategy.
 - Building on the previously created National Highway Freight Network (NHFN), including multimodal freight facilities will help to inform an integrated strategy at the national level. In addition to critical freight highways, the NMFN should include key freight railroads, rail yards, airports, maritime ports, intermodal logistics hubs, and border crossings.

While these purposes will be valuable, we have concerns about the potential for the NMFN to be used for prioritizing federal formula or discretionary grant investments. Connecting the NMFN to a rigid decision-making rubric for funding distribution could reduce the ability of state, regional, and local governments to use freight funding in ways most beneficial to goods movement. The NMFN will have great utility for a range of planning efforts, but should not be used to inflexibly dictate funding decisions without state or local discretion.

Question 2: How do you plan to use the National Multimodal Freight Network once it is designated?

The NMFN will serve as a valuable tool for guiding freight planning activities throughout the state. The facilities and infrastructure identified within the designated network would establish a standard study area for freight planning contexts. The NMFN would provide an important mechanism within planning efforts aimed at ensuring the connection of California's freight infrastructure to the national system. Caltrans would use the NMFN to inform a range of decision-making processes to target investments critical to the national supply chain. Caltrans would also use this network to promote increased freight movement efficiency across all modes of transportation in California.

US DOT questions regarding the statutory factors for designation of the National Multimodal Freight Network:

Question 3: *How should DOT prioritize the twelve factors in designating route miles and facilities on the NMFN? Which factors are most important to ensuring the network provides a foundation for the U.S. to compete in the global economy? Which factors are most important to ensuring the NMFN serves regional and state goals?*

- Facilities and transportation corridors identified by a multi-state coalition, a state, a state freight advisory committee, or a Metropolitan Planning Organization (MPO), using national or local data, as having critical freight importance to the region.
 - As the highest priority factor, Caltrans urges US DOT to envision the NMFN as a flexible network to allow states the ability to address emerging needs and to nominate and designate facilities and routes based on continuous consultation with stakeholders and regional agencies.
- Freight choke points and other impediments contributing to significant measurable congestion, delay in freight movement, or inefficient modal connections.
 - Eliminating bottlenecks on critical freight routes and hubs aligns with state goals for promoting economic prosperity.
- Access to border crossings, airports, seaports, and pipelines.
 - Another factor important for ensuring the network provides for global economic competitiveness is access to multimodal hubs. In addition to these hubs and key highway, rail, and pipeline corridors and connectors, we suggest providing designations for intermodal transfer facilities, private port terminal facilities, warehousing and distribution hubs, agricultural facilities, and logistics centers.

US DOT questions regarding the measurable thresholds, criteria, and data for designation of the National Multimodal Freight Network:

Question 4: *Among the various statutory factors, volume, value, and tonnage are among some of the most quantifiable and readily comparable across modes and routes/corridors within modes. What thresholds should DOT consider for volume, value, and tonnage for designating the NMFN?*

- Highway network
 - We advocate for the full inclusion of the existing NMFN. We encourage additional highway designations within the NMFN.

- Highway network (continued)
 - There are several highway corridors and connectors in California that serve critical national connectivity needs but are not designated on the NMFN. Examples include highways that provide access to urban centers, interregional highways serving rural areas, and highways providing network redundancy to foster freight and climate resiliency. These facilities should be included in the NMFN.
 - US DOT should provide states with the flexibility to designate facilities that meet the statutory factors, particularly for facilities lacking complete or accurate data at the national scale. Examples include facilities important to expanding markets, rural highways providing the only freight connection between regions, and local connector roads that complete the "last mile" in the supply chain.
 - We recommend designating all Strategic Highway Network corridors and connectors.
 - We recommend designating all Intermodal Connectors designated on the National Highway System.
 - Following initial network creation, we encourage continuous development of the metrics to consider emerging trends and technologies, including new developments in freight data as well as freight infrastructure.

- Rail network
 - As identified in our state freight plan, California's critical freight rail system includes two Class 1 railroads and 26 short-line railroads operating over 6,000 miles of railroad track. These facilities should be included in the NMFN.
 - The US DOT should consider flexible parameters to account for specialized functions across the rail network. For example, we recommend setting different thresholds for different rail classifications, including lowering tonnage thresholds for short-line railroads. Another example includes different criteria and thresholds based on cargo type.

- Maritime network
 - The twelve deep water seaports in California should be included on the NMFN based on their significance to the national freight system.
 - California's waterway corridors and first and last mile waterway connectors should be part of the NMFN.
 - The US DOT should ensure key freight infrastructure in international gateway states is included in the NMFN. California serves as the nation's primary gateway to the Pacific Rim. States that serve as international gateways should be assured that key freight highways, rail lines, and intermodal terminals are included in the NMFN.

- Maritime network (continued)
 - Small and medium ports are key to maximizing global competitiveness. The ports often experience significant challenges meeting the financial obligations associated with maintaining or building new port infrastructure. These ports provide resiliency in the United States supply chain, ensuring the flow of goods in the event larger ports become congested or otherwise impacted.
- Air cargo network
 - Airports should be determined by value and volume, in addition to weight. Goods shipped by aircraft are typically lightweight, have high value, must travel a significant distance and arrive in a short timeframe. Considering the typical cargo handled via aviation, value and volume will best reflect airports' economic significance to the nation.
 - If data relating to cargo value and volume is not available, total cargo weight (departing cargo and arriving cargo) should be used to accurately reflect air cargo activity.
 - It is important to use timely data sources for air cargo in the designation effort. Many top air cargo airports in California have seen significant increases since 2018 in response to the pandemic, continued consumer shifts to e-commerce, and other factors.

Question 5: *Which of the 12 factors are most important for identifying network components that are critical to our economy but that may not stand out on a volume or value basis?*

- Factor 10, "Facilities and transportation corridors identified by a multi-State coalition, a State, a State freight advisory committee, or an MPO, using national or local data, as having critical freight importance to the region", is key for ensuring that state, regional, and local perspectives are incorporated in the process.

Question 6: *DOT has identified potential data sources for each of the 12 factors, below. Are there other data sources or approaches DOT should consider in applying these factors to the NMFN designation? Are there any concerns with using a particular data source listed below for the associated factor?*

- Data source considerations
 - US DOT should consider integrating real-time data analytics platforms that track freight movements and/or utilize predictive analytics to forecast future freight flows and choke points.
 - US DOT should explore collaborations with freight data vendors and logistics firms that could yield private data sets offering additional granularity on freight mobility.
 - Potential data sources include:
 - Probe data sources, or Global Positioning System-based data of commercial vehicles or other cargo.

- Public and proprietary commercial data regarding the e-commerce and warehouses with understanding of emerging industries and commodity flow trend change.
 - Truck ingress/egress data from airports, seaports, and rail intermodal facilities.
- Data source concerns
 - Timeliness and frequency - some data sources, like the Commodity Flow Survey, have lags of over five years. The data may not accurately reflect current conditions.
 - Coverage limitations - while extensive, data sources such as the Freight Analysis Framework may not capture all types of freight movements, mainly urban good movements or last-mile delivery services.
 - Financial implications - public agencies are faced with limited resources, creating challenges for procurement of the latest freight data that could be valuable to the state freight planning and programs.
 - Stakeholder engagement - we urge US DOT to engage with all stakeholders, including state and local governments, the private sector, academic institutions, and others to continuously refine data collection, integration, and analysis methodologies.

Question 7: *In addition to the statutory factors listed, how should DOT take into account the factors below in designating the NMFN?*

- Safety (including truck parking)
 - Safety is paramount. Information relating to incidents on freight routes or at freight hubs may increase our understanding of system needs. Including safety as a factor increases opportunities to use the NMFN to inform freight planning and improve system performance.
 - In practice, the theme of safety may lend itself more as a possible *application* of the NMFN as opposed to a designation factor. It is unclear whether designation would be based on infrastructure with strong performance in safety or infrastructure with outstanding need; there are pros and cons with either approach.
- Climate and Sustainability
 - Caltrans recommends promoting low or zero-emission vehicles to mitigate emissions and reduce environmental impact, expanding electrification efforts for freight corridors and hubs, and addressing infrastructure challenges related to alternative fuel availability and technology.
- Equity
 - The NMFN may provide a valuable tool in freight planning efforts for considering access to services and regional connections. The network could help with assessing the vulnerability of communities to pollutants and health issues. We urge US DOT to engage with state, regional, and local agencies and communities for a more precise understanding of the locations of these communities.

- Equity (continued)
 - Similar to safety, the theme of equity may better serve as a possible *application* of the NMFN as opposed to a designation factor. For example, methodologies that would preclude designation of important freight facilities based on location near a vulnerable community could undermine our ability to make improvements aimed at addressing impacts and improving livability.
- National Defense
 - We recommend including the Strategic Highway Network, Strategic Rail Corridor Network, and the National Port Readiness Network in the NMFN.
- Consistency with other federally designated networks including the Electric Vehicle (EV) freight network and the zero-emission vehicle freight strategy.
 - We recommend including corridors designated as Freight EV Corridors within the National Alternative Fuel Corridor network. We recommend including corridors designated as California Clean Freight Corridors.
- Transformation (including emerging technologies and innovation)
 - Factors under this category may include connected vehicle technologies, which are expected to yield mobility, safety, efficiency, and environmental health benefits.

Question 8: *What other considerations should the DOT take into account in designating the NMFN?*

- Caltrans suggests adding consideration for the following facilities:
 - Alternative routes that serve freight in the event of major disruption on primary routes.
 - Critical freight routes that experience high seasonal fluctuations, such as routes facilitating agriculture. These routes serve high truck demand during seasonal peaks but may fall under the established activity thresholds when using annual averages.
 - Routes providing access to truck parking and rest areas.
 - Federal and state-designated routes critical for providing access to alternative fueling for medium- and heavy-duty vehicles.
 - International border crossings, including land ports of entry in California that are critical for multimodal goods movement at the national scale.
- Caltrans recommends continued coordination with state DOTs, local and regional transportation agencies, railroad companies, seaports, and airports as this process moves forward. We would appreciate the opportunity for additional review periods between now and the final network designation, especially the opportunity to review a draft version of network facilities. We urge the US DOT to provide more time in future reviews or RFI efforts to foster collaborative exchange of information between Caltrans and our public and private sector partners in the state.