



CORVALLIS AREA METROPOLITAN PLANNING ORGANIZATION

301 SW 4th Street, Suite 140 • Corvallis, Oregon 97333
Phone: 541-758-1911 • Fax: 541-758-3127
www.corvallisareampo.org

January 27, 2011

Michael Bufalino
ODOT TDD, Freight Mobility Unit
555 13th Street NE, Suite 2,
Salem, Oregon 97301-4178

Re: Comments on Draft Oregon Freight Plan

Dear Mr. Bufalino:

Thank you for your presentation of the Draft Oregon Freight Plan to the Corvallis Area MPO (CAMPO) Policy Board. The CAMPO Policy Board discussed the content of the Oregon Freight Plan and directed me to submit the following comments:

1. The draft Oregon Freight Plan provides a good snapshot of freight movements, volumes and share of modes across the State. It contains a wealth of data on the movement of freight within and through the state.
2. It is our observation that the draft plan is somewhat meek about adopting strategies that we believe are essential to the improvement of freight system in Oregon. We request ODOT to give due diligence to the following issues by including them as adopted strategies of the plan:
 - a. It is evident that freight transportation by rail is far more efficient than by trucks. Improvements to the rail system to promote a mode shift from trucking to rail would reduce energy consumption, air pollutant emissions and the need for roadway capacity expansions. Realizing that a mode shift may not be feasible in all cases of freight movement, we urge ODOT to adopt strategies for such a shift where it is feasible. This may require additional investment in the railroad system, and particularly in the short-lines.
 - b. We believe that the Plan should include policies or strategies for reducing Long Duration Idling time by trucks and trains. This idling, according to the Plan, consumes 1 billion gallons of diesel fuel and generates 11 million tons of CO₂ per year.

Member Jurisdictions:

Cities of Corvallis, Philomath, Adair Village, Benton County and Oregon Department of Transportation

- c. We believe the Plan should include direct policies or strategies to upgrade intermodal stations with technologies that reduce energy consumption and pollutant emissions. Examples of these are Weigh-In-Motion technology and the provision of electricity to the trucks parked over night.
- d. We believe it is to the best of public interests to devise strategies and policies to preserve the current and future right-of-ways of various modes along freight corridors. We request that the preservation of freight right-of-ways be included in the Freight Plan.
- e. Finally, Strategy No. 2.1, P. 135 states: “*Define and establish criteria to identify freight constraints and deficiencies.*” It seems that these are the reasons for investing in the development of a freight plan. We would have preferred if this effort had identified and addressed the deficiencies.

Thank you for providing this opportunity to comment on the Draft Oregon Freight Plan.

Sincerely

Ali Bonakdar,
Director