



MENDOCINO  
COUNCIL OF GOVERNMENTS

525 South Main Street~Ukiah~California~95482  
www.mendocinocog.org

NEPHELE BARRETT, EXECUTIVE DIRECTOR

Administration: Suite B  
(707) 463-1859  
Transportation Planning: Suite G  
(707) 234-3434

May 18, 2021

California State Transportation Agency  
Attn: Darwin Moosavi, Deputy Secretary  
915 Capitol Mall, Suite 350B  
Sacramento, CA 95814

Re: Comments on the Climate Action Plan for Transportation Infrastructure

Dear Mr. Moosavi:

Thank you for the opportunity to provide comment on the draft Climate Action Plan for Transportation Infrastructure (CAPTI). The Mendocino Council of Governments (MCOG) has in general embraced efforts to reduce the effects of climate change and increase multimodal transportation options. Local efforts to reduce climate change and vehicle miles traveled include maximizing transit funding, including purchase of fully electric transit vehicles, and implementation of active transportation projects on local streets and roads as well as state highways. Additional efforts by MCOG include encouraging implementation of EV charging networks through adoption of the Mendocino County ZEV and Alternative Fuels Readiness Plan and funding installation of public charging infrastructure.

In Mendocino County we are keenly aware of climate-related impacts to transportation. Extreme weather conditions in recent years have led to road closures due to increased flooding and slides. More frequent and widespread wildfires have highlighted the need for improved and increased evacuation routes. Our aging, rural roadways have been heavily impacted by frequent trips of heavy vehicles and equipment during post-wildfire clean up and reconstruction.

While we support the overall goals of CAPTI, we want to make sure that progress toward those goals is made in a way that allows rural regions to be viable participants in the State's transportation funding programs, benefits disadvantage communities in rural areas, allows for critical safety improvements on rural roads and highways, and supports the completion of transportation projects that have undergone years of planning and funding during development. This letter includes both general concerns as well as specific comments and recommendations on implementation strategies and actions. Because we believe these concerns are shared by many regions, we encourage the creation of a stakeholder working group, including rural representation, to guide implementation of the strategies and actions in this plan.

In general, as a rural region with limited funding, we rely upon competitive grant programs to fund major transportation projects. We are concerned that even greater emphasis on reduction of vehicle miles traveled, infill projects, and mode shift across a wide range of programs will affect our ability to be successful in statewide competitive programs and make it difficult to complete projects,

including those that would support the goals of CAPTI, such as active transportation projects. Our lower populations and geographic distance between remote communities reduce our capacity for mode-shift and make it harder to compete in these categories.

Another general concern with the implementation strategies in CAPTI is the potential to significantly change the programs created by Senate Bill 1. Voters demonstrated their support of SB 1 and its programs through the defeat of Proposition 6 in 2018. Unfortunately, some of the strategies included in the draft CAPTI, particularly Strategies S1 and S2, propose to change those programs and undermine voter trust.

The following are comments on specific strategies proposed in the draft CAPTI:

#### Strategy S2:

- S2.2: While rail can certainly provide benefit for some parts of the state, there are many regions of California that have no meaningful rail system, and likely never will. Through Mendocino County, recent legislation has started a process to convert our inactive rail corridor to a trail. Prioritizing rail investment “across all funding opportunities” has the potential to reduce funding that is currently open to all regions, while benefiting just a few.
- S2.4: Increasing ATP funding should not come at the cost of other critical transportation infrastructure programs. Mendocino County agencies regularly apply for Active Transportation funding. We are supportive of additional funding for the program, however, many other important transportation activities are also underfunded. Taking funds from other transportation infrastructure programs that are themselves underfunded, such as the STBG program, can reduce funding that rural regions use to conduct some of the most essential activities, such as basic maintenance of existing infrastructure. We recommend Cap and Trade funding as an ongoing source of additional Active Transportation Program funding. In addition, we are supportive of the proposed one-time augmentation of the program in the FY 21-22 state budget as proposed by both the CTC and Transportation California.
- S2.5: We support the need for discussions on sustainable rural transportation solutions and look forward to participating in these efforts.

#### Strategy S3:

- S3.1: We support the establishment of transportation equity and environmental justice advisory committees. When discussing transportation equity, it is critical that the rural perspective be included, and therefore request that a rural representative be included in these committees. Rural regions are home to some of the state’s most disadvantage communities, and their remoteness and lack of access often make it even harder for those communities to overcome their disadvantaged conditions.
- S3.4: Although we understand the need for tools to assist in project evaluation, reliance upon indices in the past has led to an inability to participate in funding programs in rural Mendocino County. An example of this is CalEnviroScreen, which has been used in several grant programs to identify disadvantaged communities. Mendocino County is home to several severely disadvantage communities, such as the Hopland Rancheria with a median income that’s only 36% of the state average. However, because those communities are in air quality attainment, they are not considered disadvantaged per the CalEnviroScreen definition, and are therefore ineligible for certain grant programs. If an index is developed, we request that flexibility be allowed in methods to evaluate equity and not rely solely on an index tool.

#### Strategy S4:

- S4: Several actions in Strategy 4 could result in Caltrans project prioritization that would hurt safety in rural areas. Safety related improvements on State highways in rural areas often involve widening out of necessity. For instance, widening may be needed to provide separation between vehicles on a two-lane highway experiencing crossover collisions, or to accommodate turn lanes/pockets where rear-end collisions occur. This is of particular concern in Mendocino County where we have many two-lane, rural highways, which often serve as Main Street through communities. Although these projects do not have the potential to increase capacity like projects in urban areas, the prioritization proposed would still steer Caltrans away from these projects and critical safety improvements in rural areas won't happen.
- S4.4: While we support efforts to include multi-modal, sustainable transportation in highway corridor planning, we also recognize that a dramatic refocusing of corridor planning could result in regions' inability to move forward with projects that have been in development for years, or even decades. Based on past experience, we know that major projects in rural areas take longer to plan, implement, and fund than in urban areas. In addition, most rural areas are unable to fund major projects on State highways without a Caltrans funding partnership. This reprioritization should be done in a way that still allows projects that already have significant time and money invested in development to move forward.

In addition, S4.4 calls for innovative safety solutions that advance sustainable transportation modes, particularly in rural communities. While we welcome this, and hope that it would lead to improvements to bike and pedestrian safety where state highways are Main Street, it's also critical to acknowledge that sometimes safety concerns in rural areas call for traditional solutions. For instance, vehicle accidents on rural, two-lane highways may call for widening to allow for vehicle separation or recovery. It's critical that promoting innovative safety solutions does not lead to the elimination of still needed traditional solutions.

#### Strategy S5:

- S5.1: We support development of climate risk assessment planning and implementation guidance. However, we request that the reliance on Caltrans' District Climate Change Vulnerability Assessment and Adaptation Priorities Reports, which were developed as part of a statewide contract, be minimized. Our District assessment and priorities focused on only a few climate related risks in our county, and the prioritization did not address some of our most critical climate related needs, including areas of frequent flooding, slides, and fire evacuation. We encourage that further state efforts utilize local information on vulnerability and prioritization in addition to these District assessments.
- S5.2: Implementation of climate adaptation is critical. In Mendocino County we have identified many needed climate adaptation transportation infrastructure projects, but are unable to secure funding for all but the smallest projects. However, existing SB 1 competitive programs are both inappropriate and inadequate funding sources for these projects. Projects that implement adaptation strategies are likely to be large and costly. Trying to fund these projects with existing SB 1 programs that are intended for other purposes would either greatly impact those programs or result in a continued lack of funding for adaptation projects. New sources are needed to fund infrastructure projects that implement adaptation strategies.

Strategy S7:

- S7.1 – When considering ways to strengthen the connections between transportation and land use, jobs and water availability should be considered in addition to infill housing. While several of our local jurisdictions have made efforts to encourage infill housing development, the reality in rural regions is that the residents of the housing, infill or otherwise, frequently must travel long distances for employment, in part because rural communities have small water services districts that lack sufficient number of customer accounts to be able to afford to expand service, unless State water grants are made available. Job creation should be considered as part of this equation, along with infill housing. It should also be noted that while the Affordable Housing and Sustainable Communities program is called out in this Action as a success, many parts of the state have never found success through this program.

Thank you for this opportunity to provide comment on the draft CAPTI. We appreciate the efforts of both CalSTA and CTC staff to provide multiple workshops and opportunities for engagement. We look forward to working with state agencies to help meet the State's climate goals in a way that works for all Californians.

Sincerely,



Nephele Barrett  
Executive Director

Cc: Brad Mettam, Caltrans District 1  
Matthew Yosgott, CTC