



LAKE COUNTY/CITY AREA PLANNING COUNCIL

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May 17, 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 Lake Area Planning Council (APC) is supportive of the overall goals of CAPTI, however, we have serious concerns about the potential negative impacts to transportation funding and projects in rural Lake County as a result of the some of the strategies and actions proposed in the draft in the plan.

The Lake County region is supportive of the efforts to increase clean fuel options and improve modal choices. We consistently maximize funding for transit, bicycle and pedestrian projects. As an example, our transit agency recently received a \$13.5 million TIRCP grant to construct a new transit center which will include electric charging stations, a park and ride lot, hydrogen buses and a hydrogen fueling station. Agencies in our region regularly apply for and receive Active Transportation Program grants to increase bicycle and pedestrian transportation options. All of these efforts are in line with the goals of CAPTI. We want to make sure that statewide progress in these areas continues to be made in a way that allows rural regions to be viable participants in the State's transportation funding programs benefitting disadvantage communities in rural areas, allowing for critical safety improvements on rural roads and highways, and supporting the completion of transportation projects that have undergone years of planning and funding during development.

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. 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 major 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. This change in priorities for SB 1 programs undermines voter trust.

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

Strategy S1:

S1.4: While it is understood that it is important to accelerate projects to fund innovative and sustainable transportation projects outlined in CAPTI, it is also imperative to understand that many projects are very costly in rural areas and can take years, sometimes decades, to construct due to limited resources and funding opportunities. This long lead time does not diminish the importance of projects or the need for transportation investments. It is alarming that guidelines of the TCEP will be updated to prioritize projects that demonstrate zero-emission technologies and infrastructure. The TCEP is one of very few competitive programs that would be a viable grant program for the Lake 29 Expressway project, a freight corridor project identified as a priority interregional highway in the 2015 Interregional Transportation Strategic Plan, that would likely no longer be eligible or competitive under these new priorities.

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. Prioritizing rail investments “across all funding opportunities” has the potential to reduce funding that is currently open to all regions, while benefiting just a few.

S2.3: As noted above, Lake County received a \$13.5 million TIRCP grant to greatly improve and implement zero-emission infrastructure for the transit system in Lake County. It should be noted, however, that many rural agencies do not have that capability to pursue such lofty goals or projects, and funding should not be redirected from traditional transit funding resources for rural agencies to support zero-emission goals and strategies.

S2.4: Increasing ATP funding should not come at the cost of other critical transportation infrastructure programs. Lake County agencies regularly apply for Active Transportation funding. We understand that the program is oversubscribed, however, many other important transportation activities are also underfunded. Taking funds from other transportation infrastructure programs, such as the State Highway Account, or SHOPP, can reduce funding that rural regions use to complete essential activities, such as basic maintenance of existing infrastructure.

S2.5: We support the need for discussions on sustainable rural transportation solutions and look forward to participating in these efforts. Using “rail grade separation projects with significant active transportation benefits” is not a pertinent example of a sustainable project for a rural area, and we urge dialog with rural partners.

Strategy S3:

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 disadvantaged 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. An example of this is CalEnviroScreen, which has been used in several grant programs to identify disadvantaged communities. Lake County is home to several severely disadvantaged communities. 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:

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 Lake 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.

S4.2: This strategy could be detrimental to many rural areas of the state, including Lake County, where critical projects are currently identified and prioritized in the ITSP. Updating the ITSP to meet the CAPTI Framework would undoubtedly negatively impact many projects that have been in the planning and funding pipeline for years and would likely no longer be fundable under the new guidelines.

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.

S4.5: We urge rural involvement while developing the CCAP. Establishing reduction targets for GHG emissions and VMT from all sources, including the State Highway System could, once again, negatively impact rural areas. While reducing GHG and VMT is a high priority, it must also be acknowledged that because of limited transit availability and the geographical vastness of Lake County, vehicular travel will remain the primary mode of travel in for people who often travel must out of county to get to their jobs, medical appointments, education and other essential services where transit or ride-sharing programs do not exist or aren't operational when needed.

Strategy S5:

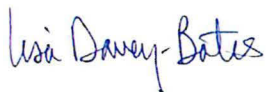
As one of the County's hit hardest year after year with devastating wildfires, we support incorporation of climate risk assessment as a standard practice. We also support fix-it-first approach, but that is not a one-size fits all, and this approach could be harmful to our region if the needs of rural regions are not considered when developing climate risk assessment strategies and guidance.

Strategy S7:

S7.1: While we support incentivizing infill and mixed-use development, that may not always result in the reduction of VMT and these incentives would not necessarily benefit rural areas. Many people who live in Lake County often travel out-of-county to Napa, Sonoma or Mendocino County for jobs because they cannot afford housing where they are employed. This jobs and housing imbalance and trend will not change until more affordable housing is available where good paying jobs exist.

Thank you for this opportunity to provide comments on the draft CAPTI. We look forward to working with CalSTA and CTC in developing a climate change framework that helps prioritize future state and federal transportation dollars that works for all Californians.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Davey-Bates". The signature is written in a cursive, flowing style.

Lisa Davey-Bates
Executive Director

cc: Brad Mettam, District 1
Matthew Yosgott, CTC
Lake APC Board Members
Assembly Member Cecilia Aguiar-Curry
Senator Mike McGuire
Congressman John Garamendi