May 19, 2021

Darwin Moosavi
Deputy Secretary, Environmental Policy and Housing Coordination
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
(submitted electronically)

Re: Climate Action Plan for Transportation Infrastructure (CAPTI) comment letter

Dear Mr. Moosavi,

The Mono County Local Transportation Commission (MCLTC) would like to thank you for the opportunity to comment on the draft CAPTI plan and appreciate Governor Newson’s goal to reduce greenhouse gas emission (GHG) and vehicles miles traveled (VMT).

The economy of Mono County is heavily dependent on recreational tourism (domestic and international). Approximately 94 percent of Mono County is in public ownership and these lands are managed by federal, state, or city agencies. Prior to the coronavirus pandemic, the Inyo National Forest hosted approximately 4 million visitors per year with many visitors driving on US 395. The Inyo National Forest has the highest visitation per year of any forest in California, and this trend will most likely continue due to visitors “escaping” to the region to enjoy the many recreational opportunities the Eastern Sierra offers.

The Mono County Local Transportation Commission (MCLTC) offer the following comments:

1) Support consistent funding levels to address safety, goods movement, and mobility

We appreciated the fix-it-first approach and realize additional money is only available through discretionary transportation infrastructure funding. Many of the current programs like the Interregional Transportation Improvement Program (ITIP) and the Active Transportation Program (ATP) and are oversubscribed. The MCLTC has worked regionally though a Memorandum of Understanding (MOU) with Kern Council of Governments, Inyo County Local Transportation Commission and Caltrans District 9 to fund significant improvements on the SR 14 and US 395 corridors. Significant fluctuations in funding have impacted these large capital projects.

It is possible to reduce GHG and VMT once visitors arrive in our communities, but with a tourism-based economy, the traveling public will have to drive here first. We are concerned that CAPTI type projects will move to the front of the line for ITIP funding. Some of our MOU projects have been around since the late 1990s. These projects have significant safety benefits to the traveling public in our rural part of the state.

We support additional funding for the ATP (key action S2.4) and Zero Emission Vehicles infrastructure (key action S2.3). The ATP program can continue the development of multiuse paths for walking and biking within our communities. State highways also function as main street in many
of our communities. Our regional transit operators, Eastern Sierra Regional Transit (ESTA) and Yosemite Area Transportation System (YARTS) provide alternatives to driving once you arrive in the eastern sierra. These two programs can help us implement a true multi modal experience and reduce GHG and VMT.

We fully support additional discussion on “Sustainable Rural Transportation Solutions,” mentioned in key action S2.5 of the draft plan. One issue rural areas of the state face is the digital divide and lack of internet connectivity. Increased rural connectivity could provide additional ways to reduce GHG and VMT in rural communities.

2) Support Community involvement is transportation projects under implementation strategy 3

The MCLTC supports the additional efforts for outreach to our disadvantaged communities. We support development of additional tools under key action S3.4 in order to better utilize an equity index to evaluate or prioritize projects in disadvantaged communities.

3) Support climate resilience and protection of rural landscapes in the transportation planning process

Mono County and the Town of Mammoth Lakes collaborated on a Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). This plan examined various hazards (geologic, fire, flood, weather related) and impacts to persons and property due to fire, geologic, and weather-related events in Mono County. We support key actions S5.1 and S5.2 to better utilize information and current funding programs to implement transportation projects consistent with MJHMP identified needs. In short, many local governments already have these plans in place in order to be eligible for state and federal disaster relief funding.

We support key action S5.3, Incentivizing Land Conservation through Transportation Programs. Rural communities often have environmental constraints, sensitive species, and habitats. Some of these habitats are bisected by highways and disconnect wildlife migration corridors. In Mono County, deer herds must navigate US 395 and SR 203 twice a year without adequate wildlife crossings. Vehicle wildlife collisions lead to extensive property damage and high animal mortality rates. Finally, regional efforts like the Eastern Sierra Recreational Partnership might be helpful to the State as it identifies conservation and climate resiliency on working and recreational landscapes.

4) Support the transportation, land use and housing connection

We support infill development within our communities as these areas are typically the job centers in Mono County (key action S7.1). There is a need for additional funding programs from the state or additional ways to increase housing within our communities. Often, the necessary infrastructure upgrades to allow for higher density development is an impediment in small rural areas. Our housing needs are typically for smaller projects within our communities.

In conclusion, the MCLTC appreciates the ability to take part in future planning efforts to limit climate change. We do ask that state investments be responsive to the unique needs and characteristics of each region whether urban or rural.

Thank you for the opportunity to comment on the Climate Action Plan for Transportation Infrastructure (CAPTI). Please contact Gerry LeFrancois, Co-Executive Director, if you have any questions at 760.924.1810 or glefrancois@mono.ca.gov.

Sincerely,

Jennifer Kreitz, Chair Mono County Local Transportation Commission