



North State Super Region

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May 19, 2021

The Honorable David S. Kim
Secretary, California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Subject: Comments on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

Dear Secretary Kim:

The North State Super Region (NSSR), formalized through a memorandum of agreement on October 20, 2010, represents a partnership between the sixteen northern California Regional Transportation Planning Agencies and Metropolitan Planning Organizations, to provide a unified voice when addressing state and federal transportation funding and policy decisions and establish coordination of transportation planning efforts.

The NSSR appreciates the opportunity to review and comment on the Draft CAPTI. The NSSR looks forward to continued coordination to provide input on the potential revisions to the draft strategies so we can best assist in meeting the State's climate goals, while also continuing to deliver vital transportation projects that address the critical rural regional needs and priorities across the North State. The NSSR certainly recognizes the importance of the State's climate goals and believe our input can assist in the successful implementation of Executive Order N 19-19.

The NSSR requests that California State Transportation Agency (CalSTA) include additional language and clarifying information in the final version of the CAPTI related to implementation of the strategies to identify the differences that exist between urban, suburban, and rural areas of the state and the associated applicability to ensure priority projects in the North State are not disadvantaged.

It is critical that the CAPTI acknowledge and address the differences of transportation projects in rural areas, as well as the challenges related to delivering critical transportation projects that are often dependent on leveraging funding from the discretionary funding programs addressed by EO N 19 19. It is important to note that the California Transportation Plan 2050 identified that the entire North State Super Region only account for only 6% of the state's Vehicle Miles Traveled (VMT). Therefore, it is critical that careful consideration be given to the practical implementation as it applies to the NSSR and other rural areas of the state to avoid unintended consequences while still achieving the goals of the Executive Order and regional priorities.

The majority of rural projects that are planned to increase capacity on state highways are needed to address a long history of severe and fatal injuries, provide interregional connections between rural disadvantaged communities and suburban/urban economic job centers/multi-modal transportation options, are critical goods movement improvements, are needed to provide safe evacuation in the event of wildfires, and reduce Greenhouse Gas (GHG) emissions and do not significantly increase VMT. To no longer prioritize investment in the completion of these rural corridors will result in additional lives lost and move us in the opposite direction of attempting to achieve zero fatalities.

NSSR also offers the following specific comments on the Guiding Principles and Draft Investment Strategies:

- ***Guiding Principal – Promoting projects that do not significantly increase passenger vehicle travel:*** NSSR understands the importance of reducing VMT to improve air quality and reach the State’s climate goals. However, additional language is needed to help make the clear distinction that while limited in number, the majority of rural projects that add capacity are safety and operational improvements that do not induce significant VMT growth. These projects often are improving safety and operations on interregional routes connecting rural disadvantaged communities to economic job centers and multi-modal transportation options, help to reduce conflicts between freight and passenger vehicles, and are needed to facilitate the ability to safely evacuate residents in the event of a wildfire.

It is important to recognize that the urban-based research on induced demand elasticities is in most cases not applicable to rural state highways. The following excerpt from page 20 of the *OPR Technical Advisory on Evaluating the Transportation Impacts in CEQA* states:

“... Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. The most recent major study (Duranton and Turner, 2011), estimates an elasticity of 1.0, meaning that every percent change in lane miles results in a one percent increase in VMT. This method would not be suitable for rural (non-MPO) locations in the state which are neither congested nor projected to become congested.”

It is important to recognize that the urban-based research on induced demand elasticities is not applicable to the majority of rural state highway projects and that it is dependent on the context of the location. The factors that drive induced demand, such as congestion extending over long periods of the day resulting in latent demand, congested parallel facilities, re-routing of traffic, viable multi-modal alternatives, and significant travel time savings are not present to result in induced demand. Additionally, many rural areas do not have significant population growth or economic development opportunities adjacent to the projects, which can lead to induced demand, and most rural projects are typically only a few miles in length. Data is available from rural highway expansion projects that support this point.

Furthermore, many of these rural transportation projects that are planned for the near-term or already under construction required a decade or more to plan, design, and deliver and these corridors remain uncompleted. This is due in part to the small formula share of funding each rural agency receives. Without the continued focus and partnership of the Interregional Improvement Program, Senate Bill 1 grant programs, and Regional Improvement Program funding on these critical rural projects they most likely will not be able to be completed. To no longer support these projects in rural areas will result in increased fatalities, undermine the regional planning process, be counter to geographic equity, and present social and political

challenges for future planning and project delivery, as well as the implementation of the Executive Order.

- ***Guiding Principal – Making safety improvements to reduce fatalities and severe injuries of all users.*** NSSR wholeheartedly supports reducing fatalities and severe injuries of all users towards zero. However, the type of safety improvement projects listed under this strategy should also consider the type of improvements that are needed in rural areas. Rural safety projects are often focused on reducing fatalities and improving operations because rural highways have a much higher fatality rates than highways in urban areas. Rural safety projects often include projects to provide safe passing, installation of truck climbing lanes, passing lanes, median barriers, collecting ingress and egress via frontage roads to new access-controlled intersections, and constructing continuous shoulders for bicyclists, disabled vehicles, and emergency access. These projects may necessitate widening the highway to provide the infrastructure necessary to improve safety and operations, and in some cases to provide the infrastructure needed to handle emergency evacuations and to allow for contra-flow emergency lane management, all of which can be perceived as adding capacity, but in most cases do not significantly induce VMT. This difference between urban and rural safety improvements and the lifesaving value of rural safety projects should be considered when an action plan is developed to include safety.
- ***Strategy 1.3:*** The NSSR requests that language be included to clarify that the early planning phases for projects located in uncompleted interregional highway corridors that align with CAPTI are also eligible for fast tracking in into the Interregional Transportation Improvement Program (ITIP). The State needs to prioritize ITIP funding and complete the interregional corridors that have been included in previous and current versions of the Interregional Transportation Strategic Plan (ITSP). Statute requires that 60% of the ITIP funds to be spent on the Interregional Roadway System (IRRS) outside of the urbanized areas. These projects are focused on improving safety and operations for all users, reduce GHG emissions, and address equity by providing connectivity to rural low-income and economically disadvantaged communities.
- ***Strategy 2:*** The NSSR supports the strategy to identify opportunities to revitalize transit public transit service and support Zero Emission Vehicle (ZEV) infrastructure deployment throughout the Super Region. Additional transit funding is needed in order for rural transit operators to increase frequencies and to fund interregional transit connections to make transit a viable alternative to the automobile and assist in reducing VMT. NSSR also suggests that if statewide rail and transit will be centered around the California State Rail Plan, that consideration be given to how rural counties can make connections to the passenger rail network.

NSSR is appreciative that this strategy acknowledges the importance of making ZEV infrastructure available to rural communities. ZEV and zero-emission-freight infrastructure investments in rural areas of the state need to identify a reliable source of energy to power the infrastructure. Many rural areas experience regular power outages. Transmission lines are particularly vulnerable in rural areas due to natural disasters and this could be exacerbated by climate change. PG&E's power shutdowns due to high fire danger conditions also need to be addressed as many rural areas are hit by these planned shutoff's which, in turn, affect the ability of rural areas to support ZEV infrastructure.

- ***Strategy 2.4:*** While the NSSR supports increased funding for the Active Transportation Program (ATP), it strongly opposes the proposed strategy to increase funding by redirecting funding from other existing transportation funding programs.

- **Strategy 2.5:** The NSSR also supports the opportunity to convene discussions to explore actions CalSTA can take to advance rail, transit, active transportation, and ZEV deployment in rural communities.
- **Strategy 3:** As the state focuses on equity and environmental justice in transportation planning and funding decisions, we need to ensure that there is a focus on geographic and economic equity across the state. Many of the rural areas across the state are economically disadvantaged, lack affordable housing, and also depend on interregional connections to access multi-modal options, employment, education, health services, and these rural highways serve as critical evacuation and goods movement routes. Both state policy and funding decisions going forward need to acknowledge and address the historic lack of investment in these areas and understand the unique challenges and differences.
- **Strategy 4.2:** The CAPTI language regarding the alignment of the ITSP update with the CAPTI framework should include the following clarifying statements publicly made by CalSTA that, “Although California’s statewide transportation funding programs have different statutory purposes and invest in various types of infrastructure, collectively they can offer a shared transportation vision. Understanding that there isn’t a one-size-fits-all approach to the transportation needs of the state’s diverse communities, CAPTI calls for a range of investment strategies.” It should also include the statement that “CAPTI will not ban highway capacity projects. However, upon approval of CAPTI and program guidelines updates, projects that could substantially increase vehicle miles traveled (VMT), generally in urbanized areas, may not achieve the same prioritization or competitiveness in some programs as in previous years.”
- **Strategy 5.2:** NSSR appreciates the consideration for physical climate risk as many rural counties are faced with undertaking planning efforts to address the adverse climate related events and infrastructure improvements to address things such as wildland fires, sea level rise, increased snow events, landslides, flooding, and washouts. In 2017 significant weather events caused \$1.5B of damage to California’s Road System. This highlights the importance of consideration being given to hazard mitigations when improving existing facilities, such as rock fall protection, bridge reinforcement, removing roads from new climate related flood elevations, and landslides/slip outs etc. Funding consideration should be given to transportation projects that have assessed and are planned to address the physical climate risks, including projects to harden infrastructure. Additionally, development of the Climate Risk Assessment Planning and Implementation guidance needs to address climate related wildfire risks and prioritize funding for projects are identified as necessary to improve state highways in high wildfire risk areas that serve as major evacuation routes.
- **Strategy 6.1:** The NSSR supports additional research and support for establishment of statewide and regional VMT mitigation exchange and VMT mitigation bank programs to assist implementation of Senate 743 and providing a nexus to funding regional projects that reduce VMT.

Sincerely,



Mike Woodman, Executive Director
Nevada County Transportation Commission
Chair, North State Super Region
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