

May 19, 2021

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

Subject: Rural Counties Task Force Comments on CalSTA's Climate Action Plan for Transportation Infrastructure

Dear Mr. Moosavi:

The Rural Counties Task Force (RCTF) represents California's 26 rural Regional Transportation Planning Agencies and Local Transportation Commissions, as well as several Metropolitan Planning Organizations (MPO) with rural areas within their boundaries. The geographic expanse of RCTF member counties is vast across a diverse rural landscape. The RCTF establishes a partnership among rural counties allowing for a unified voice to address issues and opportunities around state and federal transportation planning, funding, and policy issues. The RCTF relies on strong partnerships with state and federal transportation agencies to ensure rural California is included in transportation funding and policy decision making.

The success of any statewide effort is only as good as its stakeholder and interagency engagement. The RCTF values early and ongoing engagement and appreciates the opportunity to provide input on the Climate Action Plan for Transportation Infrastructure (CAPTI). While RCTF member counties are very diverse, they face common challenges with transportation project planning, funding, and delivery. Rural California spans communities which enjoy an abundance of natural resources and have an acute awareness of and appreciation for clean air, water, and a sustainable climate. Rural counties face the growing threat of extreme weather events brought about or intensified by climate change.

RCTF members are committed to transportation investments which help California meet its goals to improve the health, sustainability, and wellness of the climate and our communities. We appreciate your leadership in the development of the CAPTI to implement Executive Order N-19-19 which provides a clear direction toward a statewide vision of a more sustainable climate future. For the CAPTI to be successful, RCTF feels it must go a bit further to consider the challenges facing rural counties. RCTF would like to continue to work with CaISTA to ensure the investments and decisions made through a CAPTI framework are not a one-size-fits-all approach and can be scalable, locally supported, and pragmatic to account for the unique opportunities and challenges that face each region. The RCTF is submitting the following overarching comments, not specific to any one CAPTI strategy, to help illustrate how rural California can best contribute toward a shared vision of a more sustainable future through implementation of CAPTI and Executive Order N-19-19.

• CAPTI must illustrate how strategies will be implemented throughout rural regions, how this differs from urban regions, and yet addresses CAPTI objectives and supports the transportation, safety, and equity needs of rural Californian's. Applying one implementation strategy statewide will surely leave rural communities without opportunities to invest in much needed transportation infrastructure.

- CAPTI shifts focus away from traditional safety and roadway investments toward transit and active modes. RCTF understands and supports transit and active mode shift as it is critical to reach climate targets. However, many rural counties still need safety and roadway improvements that serve the very basic needs for their residents and visitors alike. CAPTI needs to illustrate how these needs can continue to be addressed through locally supported and pragmatic investments.
- Rural counties receive limited formula funding, local revenue, and/or competitive funding to invest in transportation projects which improve safety and mobility, requiring much more time to plan for and generate funding. Repurposing existing funding sources to better align with CAPTI strategies will further impact project delivery and prolong safety and operational improvements.
- Moving funding from existing SB 1 programs, supported by the voters in the defeat of Prop 69, to support
 other priorities will undermine local, regional, and state transportation agency credibility and trust
 throughout California, especially in rural regions. It will impact the ability of rural counties to pursue selfhelp tax measures as it will place in question local, regional, and state agencies commitment to use tax
 revenue as it was originally intended.
- The foundation of CAPTI and Executive Order N-19-19 is a set of very specific strategies for investing in the transportation sector in ways which directly impact climate change. RCTF members would be much more supportive if regional flexibility were given to address safety, goods movement, and mobility needs that both align with CAPTI but also serve the actual needs of rural residents. Shifting the focus in key urban areas while also investing in and allowing more flexibility in rural regions will likely have a greater impact.
- Public transit is a key focus of the CAPTI strategies toward reducing greenhouse gases, and rightly so. RCTF supports this concept but also recognizes that transit in rural communities is very challenging and has less direct impact on reducing VMT and greenhouse gas emissions than it does in urban regions. Therefore, more focus on expanded electric vehicle charging infrastructure, electric vehicle use/access, and broadband would better serve rural counties in their effort to meet statewide climate goals.
- The RCTF members fully support the inclusion of equity and environmental justice in transportation
 planning and programming decision making. Many rural regions are economically disadvantaged, lack
 affordable housing, and rely on interregional state transportation routes for commerce, employment, and
 daily trips. CAPTI needs to acknowledge and invest in these rural underserved regions through the ITSP,
 and other funding mechanisms traditionally intended for these purposes.
- CAPTI focuses a great deal on the reduction of VMT and limiting or eliminating support for transportation investments which have any measurable increase in VMT. Rural counties continue to plan and secure funding for highway, street, and road projects which improve safety and mobility and improve evacuation and resiliency of their communities, which at times present a nominal increase in VMT. However, this increase is measured against the miniscule VMT currently generated in many of the rural regions. Eliminating any and all funding for these critical roadway projects will further disadvantage rural communities, placing them at greater risk of catastrophic weather events, and further impacting their economic sustainability and quality of life, all while making little to no measurable improvement to statewide VMT reduction.

The RCTF looks forward to the continued partnership in addressing the implementation of the CAPTI and doing what we can to help meet the statewide climate change goals. We appreciate both CaISTA and the CTC and their efforts to include RCTF in the discussion and offer opportunities for engagement. We look forward to working toward a shared vision of a sustainable climate future which is enjoyed by all Californians.

Thank you,

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Woodrow Deloria, Executive Director El Dorado County Transportation Commission Rural Counties Task Force, Chair