



May 19, 2021

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

RE: Comments on CAPTI

The San Joaquin Valley Regional Transportation Planning Agencies' Directors' Committee respectfully submit the following comments regarding the Climate Action Plan for Transportation Infrastructure (CAPTI), specifically with regard to California's rural populations and the Plan's implementation in such proximity to the COVID pandemic. We ask that CalSTA and other state agencies consider the points below prior to CAPTI being fully enacted.

- 1) VMT in rural growth areas may get worse before it gets better** – Changing telecommuting norms brought on by COVID are enabling household migration to more rural areas on a mass scale. Rural areas average double the VMT per person than that of urban areas.

Focusing on a one-size-fits all VMT reduction policy could adversely penalize rural disadvantaged areas that do not have alternative modes available to help reduce their VMT. Historically, rural areas do not commute downtown for their jobs, but outward in a dispersed pattern to rural resource areas such as ag fields, prisons, military bases and oil fields. Shopping and service trips are often much longer for rural residents.

Rural communities need economic development opportunities that will allow them to eventually capture these shopping/service trips locally and establish a convenient rural transit node. While telecommuting ex-urbanites may help reduce travel in these communities when they migrate, accessing shopping/service amenities over longer distances will garnish some of the VMT benefit from telecommuting. Instead of focusing in VMT reduction in rural areas, a GHG reduction goal would allow these residents to focus on clean tech that will mitigate their long commute times to resource area job sites and local amenities.

Furthermore, because of their higher commute costs, rural residents already use carpool and vanpool options at much higher rates than in urban areas, making VMT reduction from increased vanpooling more difficult. For example, nearly 50 percent of Kern's vehicle traffic is already at two-plus occupancy (more than double the national rate) and has been so for decades, without any HOV system to incentivize carpooling.

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- 2) **Congestion-pricing/VMT fee has a disproportionate impact on low-congestion/rural & mid-size communities** - Rural communities should receive relief from passenger vehicle VMT-reduction strategies like congestion-pricing or a VMT fee. The state should focus VMT reduction in areas with an urban population density that supports high-quality transit. Where there is no convenient transit, the state should help communities grow to a critical mass to where they can support more efficient transit modes and essential shopping and medical services. A statewide policy that focuses only on VMT reduction means rural communities may never be able to grow large enough to reduce their above-average VMT. Additionally, rural communities comprise a small percentage of the state's total population, so their impact on state VMT goals is relatively minor.
- 3) **Impacts on Large Families** – Rural communities often have larger families than urban communities (indexmundi.com) making the cost of individual transit fares less economical when compared to owning their own vehicle. Transit costs are calculated on a per person rate, not a per household rate like a personal vehicle. A transit option may be economical when traveling alone, but less so when traveling with a large family, even when the fare is subsidized. Any VMT reduction policy should incorporate a per passenger VMT variable. Regions with already high vehicle-occupancy will not likely be able to make much headway in reducing VMT by increasing vehicle occupancy because their vehicles are already near capacity. Giving credit to regions that have high vehicle occupancies may be one way to mitigate some of the impacts on rural disadvantaged communities.
- 4) **Congestion-Pricing/VMT fee on trucks instead of cars can work in both rural and urban areas, avoiding direct financial impacts to disadvantaged households** - Exploring a congestion-pricing/VMT fee on commercial goods movement instead of passenger vehicles makes more sense in uncongested rural/mid-sized areas. One commercial truck fully loaded is equivalent to the wear-and-tear created by 9,600 cars (gao.gov). A commercial VMT fee in rural areas could at least address trucking's share of the wear-and-tear on highways, which is as high as 80% on major rural truck routes. Trucks already pay mileage and weight fees so a more accurate system for calculating trucking's fair share of the cost to repair road damage is a step in the right direction as diesel tax revenue shrinks with the implementation of alt fuel/electric trucks. The commercial VMT fee avoids the potential direct financial impact on rural disadvantaged households. The pricing/fee could also be higher on congested routes, and provide an additional incentive to ship goods via rail through a system of connected inland container ports.
- 5) **VMT-reducing transportation projects will not be able to address the increased commuting impact of Bay Area residents relocating into the northern San Joaquin Valley and Angelenos in the south, assuming many are not able to telecommute.** Particularly as a result of COVID-related migration, this is a factor over which the SJV should not be penalized.
- 6) **VMT is becoming a less effective metric for measuring public health impacts related to climate change.** Shifting focus away from GHG and towards VMT is counterintuitive with regard to health impacts if the goal is to reduce respiratory disease effects. These becomes even more so as vehicles convert to electric power.
- 7) **GHG Monitoring Network** – VMT and EMFAC have been used as a proxy for estimating GHG emissions under SB 375. To make serious progress on GHG, the State needs to be monitoring GHG levels, including GHG drift from Asia. The air basin for GHG is global, so monitoring must be global, or at minimum monitor upwind drift of GHG into the state. Limiting VMT in the name of GHG reduction may not be nearly as effective when we consider GHG emissions drift from as far away as Asia. China accounts for 30% of GHGs produced globally where the U.S is 15% and

California, at 10% of the nation's population is likely less than 2% of the global GHG emissions. ([National CO2 Emissions from Fossil-Fuel Burning, Cement Manufacture, and Gas Flaring: 1751-2014](#)) GHG monitoring needs to consider other gases such as methane and water vapor to truly get a handle on top strategies to meet our GHG reduction goals.

The San Joaquin Valley Regional Transportation Planning Agencies' Directors' Committee is thankful to CalSTA for the opportunity to comment and hope that the Valley's perspective will be weighed into consideration as the State continues to pursue rational GHG reduction goals and strategies. Should you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Terri King".

Terri King

Executive Director for the Kings County Association of Governments
Chair of the San Joaquin Valley Regional Planning Agencies' Directors' Committee

Cc: California Air Resources Board
Joseph K. Lyon, Commissioner, California Transportation Commission
Hannah Walter, California Transportation Commission