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TUOLUMNE COUNTY TRANSPORTATION COUNCIL

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CalSTA Team
California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

To Whom It May Concern,

Thank you for the opportunity to comment on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI). We applaud the California State Transportation Agency's commitment to sustainability which is vital for areas, such as ours, where climate change is already having an increased impact- including natural disasters such as wildfires. Regarding suggestions and comments, we offer the following recommendations, to further improve rural interest representation in CAPTI.

1. Rural and remote ZEV and PHEV financing support seems lacking.

Including investments in light, medium, and heavy-duty zero-emission vehicle (ZEV) infrastructure as part of larger transportation projects. Support the innovation in and development of the ZEV market and help ensure ZEVs are accessible to all, particularly to those in more rural or remote communities. (p.16)

This comment has two parts. First, rural and remote regions are frequently both economically disadvantaged and require substantial vehicle travel in order to move around. Without financial assistance middle- and low-income residents in these areas are not likely to be able to purchase a Battery Electric Vehicle (BEV), Plug-In Hybrid Electric Vehicle (PHEV), or Fuel Cell Electric Vehicle (FCEV). Though the CAPTI mentions a focus on EV implementation in rural and remote locations and ZEV access for all, there is little to no current support for resident EV purchases outside of the densely populated Bay Area and Southern California where substantial assistance can frequently be found. An emphasis on filling that gap will be important to ensuring ZEVs are accessible to all.

Second, it is worth noting that due to wildfire risk, limited microgrids, and Public Service Power Shutoffs some rural and remote residents may feel more comfortable purchasing PHEV or FCEV over a BEV. Currently, most programs have preferences for BEV. Though this approach makes sense in urban centers it could slow implementation in rural areas.

2. CAPTI overemphasizes Vehicle Miles Traveled reduction and limiting passenger vehicle travel. Reducing carbon emissions should be the primary objective.

"Promoting projects that do not significantly increase passenger vehicle travel," (p.16)

Though a relevant approach in urban areas, this is not particularly conducive to the necessary interregional travel in rural and remote areas. These frequently economically disadvantaged areas rely upon substantial interregional travel to obtain many goods and services, including healthcare, as well as for evacuations from natural disasters such as wildfires. Rural areas have multimodal projects that increase capacity and facilitate emergency evacuations. Such projects can have a slight increase in VMT but provide significant improvements in air quality as well as safety. We recommend an increased focus on carbon emission reduction over VMT reduction in order to maintain rural interregional access.

3. CAPTI should recognize the critical role state highways perform during evacuations in rural areas during mass evacuations.

Choke points on state highways can have tragic impacts. Funding should be prioritized to correct evacuation choke points on the State Highway System.

4. CAPTI should recognize that rural areas often host many urban visitors- especially those places near national parks.

Rural and remote areas, like ours, experience significant travel to local recreational areas that hold meaning with regards to traffic impacts and VMT. It may be useful to look at a population per square mile performance measure for rural areas seeing significant recreational travel.

5. Different criteria for thresholds in rural vs. urban areas will help maintain equitable access to funding

Rural and remote communities have different needs and abilities than their urban counterparts. Many rural and remote projects will not be able to compete with urban areas on some of the defined goals in CAPTI and their approaches will be different. Therefore, in order to ensure equitable access to funds, we suggest rural and remote areas be subject to different criteria than that of their urban counterparts with regards to thresholds.

6. The absence of hydrogen options in CAPTI

We suggest expanding CAPTI to include other options, such as hydrogen, which will be especially important in rural and remote areas where electricity is variable and/or terrain is difficult to traverse.

7. Minor typo found

“without additional supportx.” (p.19)

If you have any questions or concerns regarding our comments please don't hesitate to contact me at my office number 209-533-5583 or via e-mail at dgrossi@co.tuolumne.ca.us

Sincerely,



Darin Grossi
Executive Director