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September 10, 2021

Scott Sauer

California Department of Transportation

Division of Transportation Planning

Office of Multi-Modal System Planning  
P.O. Box 942873  
Sacramento, CA 94273-0001

Re: Rural Counties Task Force Comments on the Draft Interregional Transportation Strategic   
 Plan (ITSP)

Dear Mr. Sauer:

On behalf of the Rural Counties Task Force (RCTF), I’d like to thank the California Department of Transportation (Caltrans) and its staff for efforts in preparing the Draft ITSP and providing opportunities for engagement and input. Scott Sauer’s willingness to be accessible to the rural counties throughout this process is particularly appreciated.

The 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. While RCTF member counties are very diverse, they face common challenges with transportation project planning, funding, and delivery. By advocating for the common needs of rural areas, the RCTF strives to ensure that rural California is included in transportation funding and policy decisions.

The ITSP is a critical document for many rural regions that depend on a safe and effective interregional network for essential connectivity, prosperity, and quality of life. This plan will provide agencies throughout the state with an important framework for implementing the future of interregional and multimodal transportation projects. Individual RCTF member agencies may have concerns regarding specific routes in the plan, but our comments will focus on concerns regarding the scoring criteria proposed in Appendix A, which have the potential to disproportionately disadvantage rural counties in general. As we see a welcomed and enhanced focus on equity across the State, it’s important to keep in mind that rural areas are home to some of the most disadvantaged communities and are often the most underserved. Our comments on the Draft ITSP are as follows:

*Criteria: Does the project demonstrate interregional travel mode shift, including rail, transit, or active transportation?*

* Projects on rural interregional highway corridors primarily focus on improving safety, connectivity, and goods movement. Often, these projects take a decade or more to plan and deliver due to the limited formula shares available to rural counties. And, while these more traditional improvements are critical to rural communities, these projects will not score well in this category. We acknowledge that there may be some rural intercity rail or other type project that could potentially score well in this category, but we believe the criteria should acknowledge the lack of opportunity in certain corridors in order to avoid penalizing projects on rural corridors.

*Criteria: How does the project impact single occupancy vehicle miles traveled?*

* We believe that this criteria is inconsistent with CAPTI, which encourages investment in projects that do not *significantly* increase VMT. The proposed scoring would provide a maximum of 3 points only to projects that *significantly reduce* VMT, a project with *no reduction* in VMT only 1 out of 3 points, and if the project increased VMT, even negligibly, would get 0 points. For consistency with CAPTI and to avoid disproportionately affecting rural areas, we believe scoring should be modified to reflect the goal of investment in projects that *do not significantly* increase VMT, which most rural projects achieve.

*Criteria: Does the project leverage partner funds?*

* This criteria significantly impacts rural projects and is inconsistent with equity goals. To receive the full 3 points a rural agency would need to provide greater than 50% percent leveraging funds. This disadvantages rural jurisdictions in the scoring process, as a significant match is normally not available to these small jurisdictions, particularly for large projects. Rural agencies have very small Regional Improvement Program (RIP) formula shares, are often not eligible for other formula funding sources, and few have countywide sales tax measures so it will be nearly impossible to leverage even 26%, let alone more than 50% for funding a right-of-way or construction component. This scoring criteria would limit the vast majority of rural counties to 1 point in this criteria.

*Criteria: Does the project reduce fatalities and severe injuries for all users in alignment with the Safe Systems approach?*

* Safety of all users on all facilities should be the highest priority for selecting projects. Recognizing this, we believe that this criteria should be weighted to ensure that critical safety projects receive appropriate scores in evaluation for ITIP programming. According to data from the National Highway Traffic Safety Administration, in 2015, the fatality rate per 100 million vehicle miles traveled was 2.6 times higher in rural areas than in urban areas. Although only eight percent of California’s residents live in rural areas, 43% of all traffic fatalities occur on rural highways. As presented in the ITSP, safety is rated on par with 14 other criteria and does not receive the weighting appropriate for this criteria.

*Criteria: Does the project innovatively and/or strategically improve an emergency evacuation route identified in an emergency plan/hazard mitigation plan that is supported by state/local emergency services?*

* As fires rage across California this very moment, we understand all too well how wildfire continues to increase in severity and frequency across rural California. Wildfire threat has become the new “norm” for rural Californians seeing an increase in the duration of the season and number of wildfires, as well as acres burned across California. Consequently, evacuation planning and the supporting infrastructure should be given a great deal of focus when considering the interregional corridors and their important role toward wildfire adaptation and resiliency of our rural communities. Rural State Highways, interregional routes, and principal arterials are typically the only evacuation routes for many rural communities. Investing in these rural state evacuation routes should be an immediate focus of the ITSP strategies now and long into the future as this threat to life, infrastructure, and communities is only growing more severe.

Thank you again for the opportunity to provide input on the Draft ITSP. We look forward to continued participation in the process to ensure that the final ITSP equitably serves all of all California’s diverse regions.

Sincerely,

Woodrow Deloria, Executive Director

El Dorado County Transportation Commission

Chair, Rural Counties Task Force

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