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August 7, 2020

Darwin Moosavi

Deputy Secretary, Environmental Policy and Housing Coordination

California State Transportation Agency

915 Capitol Mall, Suite 350B

Sacramento, CA 95814

Subject: Comments on the Draft Executive Order N 19 19 Investment Strategies

Dear Mr. Moosavi:

The Rural Counties Task Force (RCTF) is grateful for the opportunity to have met with you on August 3, 2020 to discuss the EO N 19 19 Draft Investment Strategies CalSTA released on July 21, 2020. As planning, programming, and project delivery practitioners, RCTF members are excited to help craft the guidance and action plan so we can best assist in meeting the State’s climate goals while also continuing to deliver transportation projects which meet the growing demands of our rural communities. Rural counties certainly value the health and wellness of our environment and believe our input is critical to the implementation of the Executive Order. One size rarely fits all, and this remains true in development of strategies to affect climate change. Therefore, we request to be included from this point forward in the development of the Draft Investment Strategies as well as the Action Plan and resulting implementation components.

Implementation of EO N 19 19 and the resulting Action Plan have the potential to present new challenges in planning and delivery of transportation projects across rural California. Therefore, it is critical that careful consideration be given to the practical implementation in rural areas of the state to avoid unintended consequences while still achieving the goals of the EO.

In addition to comments submitted by RCTF members on the survey you recently released, the RCTF is providing the following general comments relating to the Draft EO N 19 19 Investment Strategies:

* RCTF requests that a presentation and workshop be held at an upcoming California Transportation Commission meeting to allow all interested parties to share perspectives and conduct an open dialogue.
* RCTF requests additional time to develop the strategies and the Action Plan as many rural counties are experiencing significant changes in travel behavior and transportation needs as a result of COVID-19.
* RCTF encourages consideration of how implementation of EO N 19 19 now, at a time when already fragile rural economies are struggling, might adversely impact economic recovery.
* RCTF requests that CalSTA work with rural counties to develop an additional strategy to provide funding for rural safety improvements which currently do not meet the standard safety criteria.
* RCTF agencies want to ensure that they will be included in the ongoing process of refining the Draft Investment Strategies and the Action Plan as this effort moves forward.

RCTF members also have the following comments on the specific Draft Investment Strategies:

* *Strategy 1*: RCTF members strongly support maximizing benefits and reducing harm to disadvantaged communities. However, we have had experience with other grant programs where projects in severely low income communities do not qualify for funding because they do not meet the CalEnviroScreen definition of a disadvantaged community. It is critical that projects in low income communities have equal opportunity for funding as those in “disadvantaged communities” as defined by CalEnviroScreen. While low income communities in many rural counties have the advantage of cleaner air, they also typically have significantly reduced access to education and employment , making the climb out of poverty even more challenging. Therefore, it is critical that CalSTA work with rural counties to establish a metric for identifying and evaluating “disadvantaged” or “low-income or impoverished”.
* *Strategy 2*: RCTF wholeheartedly agrees with the idea of prioritizing safety. However, safety projects in rural areas can differ from those in urban areas. Rural safety projects are often focused on reducing fatalities on facilities which typically have much higher fatality rates than do highways in urban areas. Rural safety projects often include corridor widening to separate traffic and provide shoulders for recovery. These projects can also add pavement to provide for emergency evacuations and emergency vehicle access, all of which can be perceived as adding capacity and promoting vehicle miles traveled. 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 3*: RCTF members appreciate the consideration for physical climate risk as many rural counties face adverse climate related events such wildland fires, sea level rise, snow/landslides, flooding, washouts, and other severe weather events.
* *Strategy 4*: RCTF understands the importance of reducing VMT to improve air quality and reach the State’s climate goals. However, as suggested for Strategy 2 above, many rural projects may add pavement to provide lifesaving safety improvements that do not in fact increase VMT. Furthermore, many of the projects, some of which are traditional capital transportation projects, planned for the near term or already under construction required a decade or more to plan, design, and deliver. This is due in part to the small formula share of funding each rural agency receives. To no longer support those projects in rural areas would undermine support for the planning process and present social and political challenges for future planning and project delivery as well as the implementation of the Executive Order.
* *Strategy 5*: RCTF suggests that if statewide rail and transit will be centered around the California State Rail Plan, that consideration be given to how rural counties could benefit from such a plan. Many rural counties do not have passenger or light rail. Thus, providing “multimodal interregional options to all” may prove difficult. Consideration for traditional bus and van transit in rural areas may be more appropriate.
* *Strategy 6*: RCTF supports infill development to provide housing near jobs, where there are concentrated employment centers. However, infill is only one part of addressing a jobs-housing imbalance and reducing vehicle trips, and rural communities lack both housing and jobs. The strategy needs to support projects that will not only provide housing near employment but create new job opportunities so rural residents do not have to travel great distances to access employment.
* *Strategy 7:* RCTF members are some of the most adamant stewards of the natural environment and fully support transitioning to clean zero-emission freight system.
* *Strategy 8*: RCTF strongly supports investments in active transportation, especially along state routes, many of which serve as the “main street” or primary route through a rural community.
* *Strategy 9*: RCTF members are appreciative that this strategy acknowledges the importance of making ZEVs and ZEV infrastructure available to rural communities.
* *Strategy 10*: RCTF also appreciates the consideration of local conservation planning to protect natural and agricultural or working lands and recreational open space as many of the rural counties in the valley as well as mountain regions have vast expanses of crop and timber lands which support their local economies.

These conclude the comments from the RCTF on the Draft EO N 19 19 Investment Strategies. The RCTF looks forward to the continued partnership in implementation of the EO N 19 19 and yet to be developed action plan.

Thank you,

Woodrow Deloria, Chair

Rural Counties Task Force

cc: Mitch Weiss, Executive Director CTC, Senator Jim Beall, Assemblymember Jim Frazier