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**Amber Collins, Vice Chair Woodrow Deloria, Chair Nephele Barrett, Secretary** Calaveras Council of Governments El Dorado County Transportation Commission Mendocino Council of Governments  
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October 15, 2020

Marlon Flournoy

Chief, Division of Transportation Planning

California State Transportation Agency

1120 N Street

Sacramento, CA 95814

Subject: Comments on the Draft CTP 2050

Dear Mr. Flournoy:

The Rural Counties Task Force (RCTF) appreciates the opportunity to review and provide comments on the Draft California Transportation Plan (CTP) 2050. As planning, programming, and project delivery practitioners, RCTF members are excited to help provide meaningful insight into the Draft CTP 2050 to ensure the plan reflects the unique issues and opportunities facing rural California. RCTF members provide you with this input to help create a final CTP 2050, which can help meet the Statewide goals, while also continuing to deliver transportation projects which meet the fundamental needs of our rural communities. The following reflects a consensus of comments and concerns among RCTF members.

Rural counties understand and support the aspirational and fiscally unconstrained vision of the Draft CTP 2050. However, the plan would be more effective if it were to include a clear delineation of the unconstrained CTP and the constrained Regional Transportation Plans (RTP). The CTP identifies goals and aspirations which extend well beyond the financial constraint of rural agency RTPs. This difference needs be called out in the CTP to ensure rural agencies are not penalized should they not have the ability to meet the aspirational performance standards of the CTP.

Implementation of Executive Order N-79-20 will present monumental challenges in planning and delivery of transportation projects across rural California. Not only will this impact a rural county’s ability to maintain and operate existing infrastructure due to loss of fuel tax revenue, but the build-out of the electric charging infrastructure will pose an entirely new challenge in rural California. Furthermore, with the increased threat of climate change, including wildfire, flooding, and land/snow slides, basic infrastructure such as the electrical grid is already in dire need of modernization. Therefore, it would be advantageous for the CTP to consider the practical implementation in rural areas of the state to avoid unintended consequences while still achieving the goals of the EO.

RCTF members strongly support the focus of the Draft CTP on social equity through transportation investments. However, rural counties often are overlooked in this equity discussion. Caltrans should include rural counties when considering implementation of equity measures, some of which may increase the cost of driving. Rural residents often drive significantly more miles and have less access to any alternatives such as transit or active modes.

RCTF member agencies are required to develop fiscally constrained plans within a short- and long-term planning horizon. In order to be more effective, the CTP should include some level of fiscal constraint or an implementation plan or strategy. While we understand the importance of aspirational goals, the CTP will ultimately need to be implemented if those aspirations are to be realized.

These conclude the comments from the RCTF on the Draft CTP 2050. We want to thank you for the opportunity to comment. The RCTF looks forward to the continued partnership in development of the CTP 2050. If you have any questions, please do not hesitate to contact me at [wdeloria@edctc.org](mailto:wdeloria@edctc.org) or (530) 642-5265.

Thank you,

Woodrow Deloria, Chair

Rural Counties Task Force