



North State Super Region

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August 12, 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 Investment Strategies – Implementation of Executive Order N 19 19

Dear Mr. Moosavi:

The North State Super Region (NSSR), formalized through a memorandum of agreement on October 20, 2010, represents a partnership between the sixteen northern California Regional Transportation Planning Agencies and Metropolitan Planning Organizations, to provide a unified voice when addressing state and federal transportation funding and policy decisions and establish coordination of transportation planning efforts.

The NSSR appreciates the opportunity to review and comment on the Executive Order (EO) N 19 19 Draft Investment Strategies released by CalSTA on July 21, 2020. The NSSR looks forward to continued coordination and additional opportunities to provide input on the draft strategies and subsequent development of the Action Plan so we can best assist in meeting the State's climate goals, while also delivering vital transportation projects that address the rural regional needs and priorities across the North State. The NSSR certainly recognizes the importance of the State's climate goals and believe our input can assist in the successful implementation of the Executive Order. The NSSR appreciates your acknowledgement of the differences that exist between urban, suburban, and rural areas of the state and that strategies and actions must be crafted to consider these distinct differences.

It is critical that implementation of EO N 19 19 and the resulting Action Plan acknowledge and address the differences of transportation projects in rural areas, as well as the challenges related to delivering critical transportation projects that are often dependent on leveraging funding from the discretionary funding programs addressed by EO N 19 19. Therefore, it is critical that careful consideration be given to the practical implementation as it applies to the NSSR and other rural areas of the state to avoid unintended consequences while still achieving the goals of the Executive Order and regional priorities. The majority of rural projects that are planned to increase capacity are needed to address a long history of severe and fatal injuries, provide interregional connections between rural disadvantaged

communities and suburban/urban economic job centers/multi-modal transportation options, and are critical goods movement improvements.

The NSSR provides the following general comments relating to the Draft EO N 19 19 Investment Strategies:

- NSSR invites you to attend the next meeting of the NSSR to provide a presentation of the draft strategies to the group and provide a channel for on-going communication and coordination.
- NSSR requests that a presentation and workshop be held at October meeting of the California Transportation Commission in order to allow all interested parties to share perspectives and conduct an open dialogue.
- NSSR requests that CalSTA allows additional time for dialog and input on the strategies and an open and transparent process leading to the development of the Action Plan.
- NSSR encourages careful consideration of the timing of implementation of EO N 19 19, at a time when urban, suburban, and already fragile rural economies are struggling and ensure that implementation does not adversely impact economic recovery from COVID-19.
- NSSR requests that CalSTA work with the North State Super Region and Rural Counties Task Force to understand the rural regional priorities and type of projects planned and programmed across the state to ensure they are taken into consideration in relation to the draft strategies and actions.
- NSSR wants to ensure that they will be included in the on-going process of refining the Draft Investment Strategies and the Action Plan as this effort moves forward.

NSSR also offers the following comments on the specific Draft Investment Strategies:

- **Strategy 1:** NSSR strongly supports 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. In furthering measures to ensure equity, it is critical that projects in rural disadvantaged and low-income communities have equal opportunity for funding. While low-income and disadvantaged communities in many rural counties have the advantage of cleaner air, they also typically have significantly reduced access to education, employment, and multi-modal transportation options, 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” recognizing the importance of interregional transportation projects that help to remove these barriers.
- **Strategy 2:** NSSR wholeheartedly supports reducing fatalities and severe injuries of all users towards zero. However, the type of safety improvement projects listed under this strategy should also consider the type of improvements that are needed in rural areas. Rural safety projects are often focused on reducing fatalities and improving operations because rural highways have a much higher fatality rates than highways in urban areas. Rural safety projects often include projects to provide safe passing, installation of median barriers, collecting ingress and egress via frontage roads to new access-controlled intersections, constructing improvements to separate freight traffic, and constructing continuous shoulders for bicyclists, disabled vehicles, and emergency access. These projects may necessitate widening the highway to provide the infrastructure necessary to improve safety and operations and in some cases to provide the infrastructure needed to handle emergency evacuations and to allow for contra-flow emergency lane management, all of which can be perceived as adding capacity, but in most cases do not significantly induce VMT. 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:** NSSR appreciates the consideration for physical climate risk as many rural counties are faced with undertaking planning efforts to address the adverse climate related events and infrastructure improvements to address things such as wildland fires, sea level rise, increased snow events, landslides, flooding, and washouts. In 2017 significant weather events caused \$1.5B of damage to California's Road System. This highlights the importance of consideration being given to hazard mitigations when improving existing facilities, such as rock fall protection, bridge reinforcement, removing roads from new climate related flood elevations, and landslides/slip outs etc. Funding consideration should be given to transportation projects that have assessed and are planned to address the physical climate risks, including projects to harden infrastructure.
- **Strategy 4:** NSSR understands the importance of reducing VMT to improve air quality and reach the State's climate goals. However, the wording of Strategy 4 should be modified to read, **"Promote projects that do not significantly increase passenger vehicle travel"**. This would help to recognize that while limited in number, the majority of rural projects that add capacity are safety and operational improvements that do not induce significant VMT growth. These projects often are improving safety and operations on interregional routes connecting rural disadvantaged communities to economic job centers and multi-modal transportation options, help to reduce conflicts between freight and passenger vehicles, and are needed to facilitate the ability to safely evacuate residents in the event of a wildfire.

It is important to recognize that the urban-based research on induced demand elasticities is not applicable to rural state highways. The factors that drive induced demand, such as congestion extending over long periods of the day resulting in latent demand, congested parallel facilities, re-routing of traffic, viable multi-modal alternatives, and significant travel time savings are not present to result in induced demand. Additionally, many rural areas do not have significant population growth or economic development opportunities adjacent to the projects, which can lead to induced demand, and most rural projects are typically only a few miles in length. Furthermore, many of these rural transportation projects that are 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. Without the continued focus and partnership of the Interregional Improvement Program, Senate Bill 1 grant programs, and Regional Improvement Program funding on these critical rural projects they most likely will not be able to be completed. To no longer support these projects in rural areas would undermine the regional planning process, be counter to geographic equity, and present social and political challenges for future planning and project delivery, as well as the implementation of the Executive Order.

Additionally, both Strategy 4 and the subsequent development of actions should discuss an effort to promote state, regional, and local telecommuting policies and address the need for broadband access for rural disadvantaged regions to reduce VMT.

- **Strategy 5:** NSSR suggests that if statewide rail and transit will be centered around the California State Rail Plan, that consideration be given to how rural counties can make connections to the passenger rail network. Many rural counties do not have passenger or light rail and must make interregional connections. Additional funding is needed for rural transit systems in order to increase service frequency and fund interregional connections to make it a viable alternative to the automobile. CalSTA should support rural intercity bus service in the NSSR that would be

effective to connect our rural region to state rail and other intercity transportation modes; however, service in the NSSR is trending backwards with cuts in San Joaquin JPA-run intercity bus services. Efforts by the NSSR members for improved intercity bus service need better support from CalSTA and the NSSR members need representation in service cut decisions that impact our regions.

- **Strategy 6:** NSSR 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:** NSSR and the residents of Nevada County are some of the most adamant stewards of the natural environment and fully support transitioning to clean zero-emission freight system.
- **Strategy 8:** NSSR 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:** NSSR is appreciative that this strategy acknowledges the importance of making zero-emission-vehicle (ZEV) infrastructure available to rural communities. ZEV and zero-emission-freight infrastructure investments in rural areas of the state need to identify a reliable source of energy to power the infrastructure. Many rural areas experience regular power outages. Transmission lines are particularly vulnerable in rural areas due to natural disasters and this could be exacerbated by climate change. PG&E’s power shutdowns due to high fire danger conditions also need to be addressed as many rural areas are hit by these planned shutoff’s which, in turn, affect the ability of rural areas to support ZEV infrastructure.
- **Strategy 10:** NSSR 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.

Sincerely,



Mike Woodman, Deputy Executive Director
Nevada County Transportation Commission
Chair, North State Super Region
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