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May 19, 2021

David Kim, Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

RE: Comments on the Draft Climate Action Plan for Transportation Infrastructure

Dear Mr. Kim,

This letter provides Madera County Transportation Commission's (MCTC) input to the Draft Climate Action Plan for Transportation Infrastructure (CAPTI) issued on March 10, 2021. CAPTI outlines investment framework, strategies, and actions on how billions of dollars in State funding should be invested. The contents of the plan are intended to guide California's transportation sector towards investments designed to combat the effects of climate change while supporting public health, safety, and social equity.

MCTC is the Regional Transportation Planning Agency (RTPA), Metropolitan Planning Organization (MPO), and the Local Transportation Commission for Madera County consisting of 157,000 people. MCTC is responsible for the development and adoption of the Regional Transportation Plan/Sustainable Communities Strategies, Transportation Improvement Program and Air Quality Conformity determinations – as required by Federal law.

MCTC compliments CalSTA on many aspects of the CAPTI and we are supportive of the plan's emphasis on accommodating a shift towards zero-emission vehicles (ZEV) and infrastructure, investment in safe and accessible active transportation, and building towards an integrated statewide rail and transit network. We are intrigued and excited for how these strategies can improve this region at a community level. However, we do have concerns with the approach of several strategies in the plan regarding their applicability for rural and less urbanized areas, impacts to critical trade corridors and maintaining the ability for local community to see their needs adequately represented. MCTC focuses our comments here on the strategy's outlined in CAPTI.

Strategy S1. Cultivate and Accelerate Sustainable Transportation Innovation by Leading with State Investments

Existing program priorities should not be subverted. It is crucial that commitments and projects that are well underway be considered, and not supplanted or deprioritized in

the Interregional Transportation Improvement Program (ITIP). MCTC has concerns about needed improvement to State Route 99 (SR99) and the State's willingness to follow through on various commitments and years of time and resources expended on the effort. Furthermore, the SR99 South project in Madera County is a project currently supported by TCEP funding. It is reflective of collective local, regional, and state goals for the SR99 corridor.

The economic importance of SR99 to Madera County and the San Joaquin Valley cannot be stated enough, the issues on the facility related to interregional and statewide travel activity cannot be ignored. We would welcome the opportunity for further discussion on this matter as it pertains to any proposed change to TCEP funding methodology.

Strategy S2. Support a Robust Economic Recovery by Revitalizing Transit, Supporting ZEV Deployment, and Expanding Active Transportation Investments

We look forward to new and innovative ways of working with State partners towards investments in effective and accessible public transit. MCTC is working with local partners to plan for enhanced access to commuter rail. The Amtrak station in Madera County will be relocated to an area served by both urban and rural fixed-route transit services and will accommodate California High Speed Rail service for the initial operating segment between Merced and Bakersfield. These programs being able to support enhanced connectivity with disadvantaged, rural communities will help ensure an equitable approach able to meaningfully serve residents. We encourage strategies designed to provide robust support of activities designed to move more travelers on to commuter rail and assisting in community design and planning orientated to multi-modal transit accessibility.

The Active Transportation Plan (ATP) for Madera County outlines short, mid, and long-term needs identified by the community totaling over \$588 million dollars. These include over 290 new miles of active transportation infrastructure, Safe Routes to Schools updates, educational and encouragement programs, safety enforcement programs, wayfinding programs, and maintenance and ongoing operations. Being able to secure funding from State and Federal programs is an integral factor in being able to see the Madera County ATP be realized. The ATP identified the Active Transportation Program as one of the most applicable funding sources for each of the plans project investment categories. A proposal to alter the ATP Program should involve simplifying the application process. The current application process puts an undue burden on local agency staffs, hampering the potential for participation in this program.

MCTC has begun developing a ZEV Readiness Plan to identify needed policies and infrastructure to accommodate a shift to zero emission vehicle. This planning effort will help the region be prepared for ZEV goals to have a fully electrified vehicle fleet in the future. The ZEV Plan will precede local transit operators Zero Emissions Bus Readiness Plans. The effort to prepare for this comprehensive fleet conversion will be a challenge

we cannot meet alone, strong partnership and collaboration with State partners will be crucial for the region to be able to meet this goal in an equitable manner.

Madera County has a significant number of rural households and businesses, nearly half of the population lives outside of urban areas. Regional context is critical. Developing understanding of transportation behaviors in smaller, less urbanized areas is paramount to being able to establish strategies to address climate change goals while also considering local needs and issues in the process. We encourage CalSTA to engage with City, County and Regional agency staff in the Madera County and the San Joaquin Valley to establish how *Strategy S2* can be effectively and affordably implemented for all.

Strategy S3. Elevate Community Voices in How We Plan and Fund Transportation Projects

The ability for local and regional plans and programs to be reflective of community input is a valued aspect of the transportation system. For the CAPTI to bare meaningful action and results, voices from all areas of the State must be heard.

S4. Advance State Transportation Leadership on Climate and Equity through Improved Planning & Project Partnerships

It is important that regional and local government agencies from all area types are invited to participate in the development of the California Strategic Investment Strategy (CSIS). The CSIS should be sensitive to the many varying types of communities in California. These strategies need to be feasible and applicable contextually by region. What works in a densely populated urban area has limited applicability to less dense urban and rural areas in Madera County and many parts of the San Joaquin Valley.

A critical area of variance that must be considered are socio-economic conditions. Focusing on a one size fits all VMT reduction policy could adversely penalize rural disadvantaged areas that do not have reasonable access to alternative options available to help reduce their VMT. In the San Joaquin Valley, rural areas do not commute downtown for their jobs, but outward in a dispersed pattern to rural resource areas such as distribution centers, ag fields, prisons, military bases, and oil fields. Shopping and service trips are often much longer for rural residents.

Rural communities need economic development opportunities that will allow them to eventually capture these shopping/service trips locally and establish a convenient rural transit node. While telecommuting exurbanites may help reduce travel in these communities when they migrate, accessing shopping/service amenities over longer distances will garnish some of the VMT benefit from telecommuting. Instead of focusing in VMT reduction in rural areas, a GHG reduction goal would allow residents to focus on clean tech that will mitigate their long commute times.

S5. Support Climate Resilience through Transportation System Improvements and Protections for Natural and Working Lands

The intent to alter the nature of SB1 is concerning. Voters turned down Proposition 6 keeping SB1 in place. This result was in large part because of the time and effort that went into educating the public about its intent and benefits. SB1 was supported by many elected officials and community leaders in Madera County and a contentious topic locally. To meddle with SB1 in a manner that contrasts the concerted efforts taken to defeat Proposition 6 would weaken the credibility of future public support for transportation assistance. The shifted priorities need to be mindful not to irresponsibly overstep the regional priorities and needs established locally. We do not want any potential erosion of public support from State actions to also trickle down to future local Measure endeavors.

S6. Support Local and Regional Innovation to Advance Sustainable Mobility

We are concerned with the prospects and focus surrounding congestion pricing and its effective applicability on an area like Madera County. The strategy is intended to shift travel volumes to other modes. The most utilized facilities in Madera County are used by large quantities of statewide and interregional travelers for which there are little to no alternative modal options available.

Congestion pricing or VMT fees would also disproportionately impact uncongested, rural/small, and disadvantaged communities. Rural communities should receive a break on any passenger vehicle VMT reduction strategies like congestion pricing or a VMT fee. The state should focus VMT reduction in areas with an urban population density able to support high quality transit. Where there is no convenient transit, the state should help communities grow to a critical mass to where they can support more efficient transit choices and essential shopping and medical services. A broad policy that focuses only on VMT reduction risks rural communities never being able to grow large enough to reduce their above average VMT perpetuating their travel behavior.

S7. Strengthen Transportation-Land Use Connections

The land use-transportation discussion for leveraging transportation investments to incentivize infill housing production should include considerations for local economy and job growth as well. These considerations must be well understood from local jurisdictions with land use authority and reflective of local needs when proposing new funding direction. Additionally, the implementation of this strategy must also clearly define what is applicable by area type.

General Comments

MCTC strongly supports California's climate goals and are committed to improvements to passenger and freight rail systems, GHG reductions, reducing VMT, and improving public transportation, walking, biking, and other modes of transportation. We also

support transportation investments aligned with housing and economic development. A large focus of the CAPTI is related to reducing VMT. MCTC believes there are beneficial ways to achieve this within local communities. We do not want to see capricious elimination of capital projects designed to address safety, goods movement, or harmful emission reductions on the premise of those projects potential VMT impacts especially on the State highway system in Madera County. The operations on State highways in Madera County is intrinsically linked to local economies, there needs to be standards for safe, reliable facilities for their diverse users.

Madera County is one of twenty-five California counties who have voted to tax themselves to fund and build transportation infrastructure. The continued success of such measures is dependent on those tax dollars being able to effectively leverage state and Federal funds. It is a key reason Madera County voters made the choice to invest in themselves by way of a transportation measure tax. CAPTI does present new and encouraging opportunities to enhance transportation in Madera County communities, but also proposes ideas which may limit the Measure's ability to deliver on projects chosen by voters for the region. The effectiveness of the measure to follow through and deliver on funding projects is vital to the region being able to return to voters for new or extended transportation tax measures.

MCTC appreciates the opportunity to review and comment on the Draft CAPTI. The CAPTI has potential to beneficially direct change in California investments to address climate change issues. We urge CalSTA to consider our comments and concerns with the strategies that have been proposed in your efforts to make this an effective and practical plan for all of California.

Sincerely,



Patricia Taylor, Executive Director
Madera County Transportation Commission

Cc: Darwin Moosavi, CalSTA Deputy Secretary
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