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April 11, 2022

Mr. Samuel Assefa  
Strategic Growth Council, Chair  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814

**RE: Comments on California Transportation Assessment Report Pursuant to AB 285**

Dear Chair Assefa,

On behalf of the Madera County Transportation Commission (MCTC), we appreciate the opportunity to provide comments on the findings in the California Transportation Assessment Report as required by the enactment of AB 285 (Friedman), Chapter 605, Statutes of 2019. The San Joaquin Valley resides in a non-attainment air district, and our constituents suffer from poor air quality that is predominantly caused by our geographic “bowl” shaped valley, walled off by mountains, weather patterns (winds blowing West to East), vast agricultural farmland, heavy goods movement traffic, and the jobs-housing imbalance, leading to the daily migration of hundreds of thousands of daily commuters into the Bay Area and Los Angeles Basin. We understand and appreciate the goals that the California Transportation Plan and Climate Action Plan for Transportation Infrastructure are trying to accelerate meeting our 2030 objectives to reduce greenhouse gas emissions. There are some assumptions made by the report that require additional context and solutions that we hope you would consider working collaboratively to address mutual goals revolving around mobility and greenhouse gas emissions (GHG) reduction.

The report makes several findings, including:

- Too much money is spent on highway widening and projects that increase vehicle travel, and reliance on cars, which creates a gap in achieving climate goals given infrastructure funding decisions.
- Projects, which take decades to plan, do not adjust and consider multimodal options, and are rarely reevaluated.
- Too many plans resulting from many layers of decision makers (State, regional, and local)
- Metropolitan Planning Organizations (MPO) are limited in their scope of addressing land use and usage of local source to address mode-shift.
- More involvement by state agencies should be considered to help compel alignment with state climate goals.

Until the passage of SB 1 in 2017, the last time ongoing transportation funding was made available was with the passage of Proposition 116, which increased the gas tax in 1993. SB 1 is addressing massive backlogs on highways built in the 1950s, when the state’s population was one-third of what it is today. We have nearly 27 million registered drivers in this state, all of whom do not have the same travel destinations.

The Valley does not have the same population density as other regions, meaning transit and bicycle infrastructure is not practical everywhere. We also have a disproportionate number of disadvantaged communities, where the automobile represents the most viable access to educational, career, and recreational opportunities.

Vehicle miles traveled (VMT) reduction is not always possible given the lack of population density, discretionary income, travel patterns/needs, overall practicality of using a bicycle, bus, or train as an option to go to school, work, take kids to soccer practice, or goods to market. VMT is a regressive metric that may disqualify the Madera Region from being competitive for state funding, further hurting disadvantaged communities.

MCTC strongly supports California's climate goals and are deeply committed to improvements to passenger and freight rail systems, GHG and VMT reduction where feasible, and improving public transportation, walking, biking, and other modes of transportation. Our agency is already required to include a sustainable communities strategy in its regional transportation plan, providing for ample coordination with the California Air Resources Board (CARB). We support transportation investments aligned with housing and economic development. While MCTC is in strong support of addressing climate change, success will require creative, flexible, and pragmatic solutions to account for the unique opportunities and challenges that face each MPO. Our suggestions are as follows:

### **1. Allow Flexibility in State Funding Programs to Address All Modes**

SB 1 provides thoughtful, wide-ranging opportunities to address our infrastructure and mobility needs through the various programs that have been enacted. State funding programs should continue to provide flexibility to regions so that they can address all modes as efficiently as possible to maximize safety, mobility, goods movement, and throughput to expedite the response to climate change, especially on the state highway system. We request that smaller urban/rural areas that still need to plan, be recognized to fund and deliver projects on the state highway system that address safety and congestion.

The state must also consider areas where capacity expansion is necessary to address climate adaptation and resiliency or to close gaps on evacuation routes to prepare for natural disasters or other climate events. State Route 99 is the San Joaquin Valley's "main street," serving as the main arterial route for the region and is integral for interstate commerce. Enhancing access and throughput by completing gap closures is essential to help move goods and people in a safe manner. One such gap closure on State Route 99 from Avenue 7 to Avenue 12 will have the additional benefit of providing access to the proposed California High Speed Rail station and the Madera Amtrak station relocation projects and to plan for and establish large-scale multi-modal coordination.

Our regions represent one of the most productive agricultural regions in the nation, if not the world. The San Joaquin Valley annually generates over \$35 billion and produces 25 percent of the nation's food supply. Fresh produce cannot be delayed when going to processing or to market. We have nearly 27 million registered drivers in this state, all of whom do not have the same travel destinations. The state's population has quadrupled since the highway system was built in the 1950s, which has exacerbated the challenge, particularly with 50% of all imports and exports in the nation moving through the Ports of Oakland and Los Angeles/Long Beach and utilizing the San Joaquin Valley's arterials to get goods to market. We must continue to accommodate the sustained growth in goods movement and population (159% increase in the Valley since 1980) and provide pragmatic solutions. Investment in regional goods movement transportation corridors will remain a priority for our region, and heavy truck traffic is

expected to increase, along with our region's population. This necessitates a more balanced planning approach, which supports sustainable economic development across all of California and recognizes the diversity and interconnectedness of all regions, including the San Joaquin Valley.

Recommendation:

Our request is that rather than prioritizing non-capacity inducing projects on the state highway system, we request that state funding programs, particularly the SB 1 competitive programs – Local Partnership Program, Solutions for Congested Corridors, and Trade Corridor Enhancement Program, provide greater flexibility to address all modes of transportation, such as increased funding for grade separations, passenger rail, and active transportation projects, so that state resources are flexible and are used as efficiently as possible to maximize safety, mobility, and throughput, in order to expedite the response to curbing climate change on and off of the state highway system. Augmenting oversubscribed programs, such as the Active Transportation Program (ATP), would also help, but highway capacity must still be considered and not devalued, particularly when it is the only option in some areas to address congestion and safety. We need to complete highway gaps to maximize congestion management, safety, and realize the full benefit of previous investments on antiquated infrastructure to service a 21<sup>st</sup> century economy.

This is achievable with the \$20 billion net in available General Fund surplus, \$25 billion in funding from the Infrastructure Investment and Jobs Act, and additional prospective surplus from the May Budget Revise. Holding the SHOPP and local streets and roads funding, which are dedicated for maintenance and constitutionally protected, will not help the state achieve air quality objectives.

**2. Support Additional Strategies that Reduce Greenhouse Gas Emissions-Not a Cookie Cutter Approach**

Population density is an issue in Madera County, which only has two cities (Chowchilla and Madera) and a population under 160,000 over 2,153 square miles. The Bay Area has a population of 6.8 million over 7,300 square miles, Los Angeles County has 10 million people living over 4,700 square miles, and the San Joaquin Valley has 4.3 million people spread out over 27,000 square miles. The Bay Area has nearly 60% more people living in an area a quarter the size of the Valley. Los Angeles County has more than 2.5 times the population over one-sixth of the area.

According to Cal EnviroScreen, the San Joaquin Valley has 7 out of the 10 most disadvantaged communities because the region's density and infrastructure are not compelling to get residents to ditch their car as the primary mode of transportation. The automobile represents the most viable access to educational, career, and recreational opportunities. It is often not feasible for Madera Region residents to take public transportation or ride a bike to go to work, school, or conduct daily activities, such as grocery shopping, taking children to soccer practice, or running other household errands. This makes VMT reduction difficult in some cases. VMT was not intended for rural or suburban areas.

While MCTC fully supports investments in public transportation, transit is not the universal answer to reduce GHGs. Transit ridership was down in 31 metropolitan areas pre-pandemic, including the Bay Area. Most transit systems statewide do not provide 15-minute headway, which is still not convenient for people to conduct daily activities. As of 2017, only 5 percent of all trips in densely populated regions, such as the San Francisco Bay Area, were made using transit. Per-capita transit ridership in the region decreased 12 percent between 1991 and 2016. In FY 2017-18, the Amtrak San Joaquins service carried more than 1.1 million passengers, and 1.5 million passengers boarded the Altamont Corridor Express, a total of 2.6 million passenger trips. Despite this success, it is a fraction of the total number of individual

drivers; and it simply is not realistic or viable to expect that a significant shift to heavy investment in transit (or bike/ped) will be as effective in the Madera Region.

Transit is also expensive to build and operate and is not always a pragmatic or efficient solution for a constituency's daily mobility needs. This is because transit typically lacks flexibility (traditional service is fixed-route service without options for route deviation and schedules), it can be unreliable, or have long headways, and is sometimes limited or non-existent in more remote unincorporated areas.

The widespread impact of COVID-19 on public transportation has exacerbated this predicament due to the shelter in place order and social distancing protocols. Choice riders often utilize transportation network companies, leaving society's most vulnerable, such as seniors, school kids, those on a fixed income and the physically challenged, to cover the cost of operating expenses. Grocery shopping or taking kids to soccer practice is not ideal when waiting for 15-minute headways, at best, which are less frequent in many areas in the Valley. The Valley's transit operators are working tirelessly to provide the most efficient and frequent service possible, particularly for on-demand services, which as costly to provide for the medically challenged, and seniors. The recent passage of AB 149 (Committee on Budget), Chapter 81, Statutes of 2021, provides more flexibility in meeting farebox recovery requirements to maintain, if not expand service, but our residents are price sensitive to fares, which poses a challenge. The emergence of transportation network companies, which provide on-demand, personalized service, has eroded the base of choice riders for our transit system. More investments need to be made into microtransit (frequent vanpools) to make service more frequent for our most vulnerable constituents. Transit investment needs to focus on frequent, accessible, time-saving solutions for the public.

The pandemic's crash course in teleworking has proven to be effective at reducing travel while maintaining the productivity needs of employers and employees in many industries. It demonstrated that technology can be a solution to alleviating traffic congestion, improving air quality and quality of life for families striving to achieve a work-life balance, rather than spending countless hours on the road.

Recommendation:

We ask for continued investments to build out the existing San Joaquins and Altamont Corridor Express systems and bring high-speed rail and ValleyLink in the northern San Joaquin Valley to fruition.

We request that expanded investment in broadband, particularly in underserved areas, to support enhanced telecommuting, and pursuit of additional strategies, such as state support for local implementation of transportation demand management strategies, vanpools, park-and-ride lots, and VMT-mitigation credits, as well as a statewide telework incentive program (starting with the state workforce), which has strong potential to expedite addressing climate change. We appreciate the Legislature's \$6 billion investment into broadband infrastructure approved in the FY 2021-22 State Budget that is intended to improve speed and reliability in rural and lower-income communities, as well as the \$10 billion proposed over the next 6 years, to invest more into zero-emission infrastructure and rebates.

Additionally, our ask is that low-income residents in the Madera Region be considered a priority for rebates for zero-emission vehicle (ZEV) purchases and charging infrastructure deployment as a critical opportunity to help the region realize its air quality and mobility goals. Homes should be retrofitted to have outlets that will accommodate ZEVs. The focus on VMT alone could have the unintended consequence of exacerbating the problem for disadvantaged communities, farmworkers, and laborers where driving is the only option.

Greater incentives for businesses to locate or expand operations in the San Joaquin Valley. Perhaps the development of an Inland port as proposed by the Governor (\$1.2 billion in January FY 22-23 Budget) will help meet this objective. This would reduce GHGs, VMT, and is a greater return on investment than building expensive high-density housing in already densely populated, high-cost metropolitan areas.

Proportionality needs to be applied in the assessment of VMT reduction, which was never intended for rural and suburban jurisdictions. Otherwise, not meeting metrics intended for urban areas will, by default, send all the money to other parts of the state that do not have similar air quality concerns.

### **3. Support the Will of the Voters to Complete Projects and Maximize Investments**

The state always has the ultimate say on what resources are used on its assets, like the state highway system. The San Joaquin Valley has six counties (Fresno, Madera, Merced, San Joaquin, Stanislaus, and Tulare) of 25 statewide with locally voter-approved sales tax measures that include over \$4 billion of investments on the state highway system, which is owned and operated by Caltrans. These measures require comprehensive public engagement, extensive polling, contain diverse investments in multi-modal options, and ultimately require a 2/3 vote for passage so they must appeal to vast constituencies. Our region has made a commitment to the voters and our public to deliver the investments that our expenditure plan promised. A key part of keeping our promises to the voters is to secure state matching funds since each county does not generate enough in local sales tax revenues to make up for the disproportionate cost of delivering projects. This funding gap makes continued access to state funding imperative for delivering a multi-modal range of projects. Our needs and revenue generation are disproportionate to the level of investment that is needed to achieve state and regional targets for improved air quality. Therefore, a strong partnership with the state is essential.

MCTC helped initiate the discussion and worked with our legislative delegation on SB 1 to advocate for the creation of the vehicle registration fee as a carbon-neutral funding source to address congestion and multi-modal options; the creation of the State Rail Assistance Program, dedicating operations funding for passenger rail service; and augmentation of the Transit and Intercity Rail Capital Program. In 2018 voters rejected Proposition 6 (the repeal of SB 1) and supported Proposition 69 (protecting SB 1). It is important to support the intent of the voters to maintain the public trust, by preserving all modes supported in the enactment of SB 1.

#### **Recommendation:**

Our request is to maintain the state and local partnership, and maximize the return on previous investments, by allowing for local sales tax measures to continue leveraging state dollars to deliver highway capacity projects, which would also help facilitate public transportation service.

### **4. Assessing MPO and local government roles and responsibilities**

#### **Recommendation:**

The inclusion of a broad spectrum of MPOs and local government agencies is imperative in any discussions, recommendations, and decisions regarding specific authorities and institutional structures. These agencies must be at the table and part of the decision-making process involving any proposed changes, including roles, responsibilities, authority over local transportation and land use plans, geographic scope, cross-border relations, board composition, voting rules, assignments of responsibility, and financial capacity. MCTC is opposed to MPO boundary changes and altering governing structures.

## **5. Report Assessment of Projects included in RTP/SCS**

The authors of the report attempted to evaluate the projects contained in the most recent RTP/SCS within the state. It is important to note that some “road” projects contribute to the reduction of ozone precursors, such as particulate matter. For example, shoulder paving projects in the Madera Region reduce particulate matter along rural roads by reducing the amount of dust that is kicked up by vehicles, particularly by larger vehicles, that are hauling agricultural commodities. A secondary use of these paved+ shoulders is that bicycle lanes can be added once enough connected projects are completed.

The MCTC RTP/SCS does include highway projects. State Route 99 is a critical goods movement corridor with gaps in the Madera Region. The inclusion of completing these gaps that only have two lanes in each direction to three lanes is important for safety and the timely movement of goods.

### **Recommendation:**

The report needs to recognize that the inclusion of certain types of “road” projects are still important and critical in rural/agricultural areas of the state and where safe goods movement infrastructure is lacking. One size does not fit all, and some road projects have multimodal benefits that were not analyzed or recognized.

Thank you for your consideration of our comments. We look forward to working with you on issue of great concern. If you have any questions, please feel free to contact our Executive Director, Patricia Taylor, at [patricia@maderactc.org](mailto:patricia@maderactc.org) or (559) 675-0721.

Sincerely,

Tom Wheeler  
Chair

cc: Members of the Strategic Growth Council  
The Honorable Frank Bigelow, Assembly Member, 5<sup>th</sup> District  
The Honorable Anna Caballero, Senator, 12<sup>th</sup> District  
The Honorable Adam Gray, Assembly Member, 21<sup>st</sup> District