

California

Rural Counties Task Force



ruralcountiestaskforce.org

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California Department of Transportation
Marlon Flournoy, Division Chief
Division of Transportation Planning
1120 N Street
Sacramento, CA 95814
CSIS@dot.ca.gov

Re: Draft Caltrans System Investment Strategy (CSIS) and CAPTI Alignment Metrics

Dear Mr. Flournoy:

The Rural Counties Task Force (RCTF) appreciates this opportunity to comment on the Draft Caltrans System Investment Strategy (CSIS) and CAPTI Alignment Metrics. The RCTF represents the needs of the 26 rural counties of the state that rely on continued investment in the State highway system to provide safe and reliable access to key destinations. The state highway system acts as Main Street, or provides the only access to many of our small communities. For these reasons, it's critical that rural context and needs be considered when developing criteria. We appreciate the extra steps that the Caltrans CSIS team has taken to engage stakeholders, including the rural counties, in the development of this iteration of CSIS and associated metrics. We appreciate some of the changes that have been made in this version of the metrics, such as consistent score ranges across metrics. However, concerns remain that the metrics will unfairly disadvantage rural projects. We understand that testing is currently underway, and we look forward to seeing results. It is important that rural projects representative of the types of projects that we would be likely to propose are included in that process. Below are comments on specific metric and tools used in applying metrics.

EQI Tool: Overall, we have concerns with the Equity Index Tool (EQI) that's used in several metrics. The EQI wasn't developed for application to the CSIS and hasn't been adequately vetted by the Regional Agencies. It uses census blocks rather than tracts, which results in a much higher margin of error in rural areas, and ends up reducing areas in rural regions that should be considered disadvantaged due to inaccurate or insufficient data. It's also inconsistent with AB 1550 and Justice 40 mapping tools.

Safety Metric: The Safety metric requires selection of improvements from a set menu of options, rather than just considering the degree of improvement in safety. The result may be that projects with significant safety benefit do not receive appropriate scores if they differ from the predefined projects.

Vehicle Miles Travelled Metric: For the VMT metric, projects without completed environmental documents will be scored using the worst possible VMT scenario, rather than a balanced approach. This is disadvantageous for projects proposed in rural regions that may not have adequate local or regional funding to invest in an environmental review prior to seeking partnership from Caltrans and thereby subjecting a project to CSIS review. It's also unclear how the upper thresholds for the metric were determined.

Accessibility Metric: The Accessibility metric uses a time decay calibrated to metropolitan level trip making, which may not accurately reflect interregional trips common in rural areas. Essential destinations in rural areas such as healthcare, education and employment often take longer to reach, which means that accessibility improvements for basic needs may not score as well as they would in urban areas.

DAC Traffic Impacts Metric: The DAC Traffic Impacts metric, which focuses on changes in truck weighted Annual Average Daily Traffic appears to assume that truck traffic will increase at the same rate and for the same reasons, like latent demand, that passenger vehicle traffic is often projected to increase, rather than based on consumption and market demand for goods. It should be noted that freight traffic is forecasted to increase in most highway corridors with or without proposed improvement projects.

ZEV Infrastructure Metric: The ZEV infrastructure metric establishes a very high number of chargers to be installed in rural projects. Unfortunately, many areas are impacted to limits on electrical grid capacity that wouldn't allow for installations of that level. The document does acknowledge this as a constraint of the metric, but does not clarify how those projects would be scored.

Climate Adaptation & Resiliency Metric: For evacuation projects, the Climate Adaptation metric requires that "alternative measures" be a primary objective, which may not always be appropriate or feasible in rural areas with limited ingress/egress. It is important to remember that in wildfire evacuation situations, lives are at risk if people are not able to evacuate quickly and effectively. Both evacuation as well as emergency response access must be considered.

Thank you for this opportunity to comment on the current Draft CSIS and CAPTI Alignment and Metrics. We look forward to continuing to work together with Caltrans during development of these metrics.

Sincerely,

Nephele Barrett, Chair
Rural Counties Task Force