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

Mr. Abboud,

The Nevada County Transportation Commission (NCTC) appreciates this opportunity to comment on the Draft Caltrans System Investment Strategy (CSIS) and Climate Action Plan for Transportation Infrastructure (CAPTI) Alignment Metrics. NCTC would like to acknowledge and thank the Caltrans CSIS team for the additional outreach efforts taken to engage stakeholders, including the rural counties, in the development of this iteration of CSIS and associated metrics. Several of the suggestions and comments provided on previous versions of CSIS have been incorporated, such as consideration of program fit and consistent scoring ranges. However, concerns remain that the metrics may result in the unintended consequence of unfairly disadvantaging rural projects for critically needed state funding partnerships and federal discretionary funding programs.

In alignment with the Climate Action Plan for Transportation Infrastructure (CAPTI), the development of fair and equitable quantitative criteria will require significant continued coordination with the rural regional agencies and recognition that a one size fits all approach will not work in a state as diverse as California with drastically different regional needs and context. Significant consideration must be given to developing criteria that are normalized to account for these differences to ensure that rural and suburban projects are not unfairly disadvantaged and that there is consideration of geographic equity in funding decisions. Different criterion may be necessary to account for the unique differences between urban, suburban, and rural regions. To address this challenge, it may be necessary to allow certain criteria to continue to be qualitative.

CAPTI acknowledges that strategies should be deployed where feasible and states, “Understanding that there is not a one-size-fits-all approach to achieving the needs of the state’s diverse communities, realizing the outcomes outlined in the CTP 2050 requires a range of investment strategies”. It further clarifies, “It is important to acknowledge that not all highway expansion projects serve the same purpose or have the same results. There isn’t a “one-size-fits-all” approach to this issue. Context, and specific project analysis and attributes, are key to determining a project’s impacts. That is why this CAPTI guiding principle focuses on whether a project induces significant travel as the key attribute of concern,

rather than whether it is simply a highway expansion project.” This needs to be addressed appropriately in CAPTI Alignment Metrics or it will put at risk critical safety, operational, goods movement, and evacuation improvements that require state partnership.

CAPTI also acknowledges that, “In less congested rural areas, highway capacity expansion is much less likely to induce travel. Nevertheless, the benefits and drawbacks of widening roadways in this context must be weighed carefully”. These statements are important because many rural highways need to be improved to minimum facility standards and/or require strategic capacity improvements for the reasons previously stated.

Many rural highway projects eligible for funding programs addressed by CSIS are focused on improving safety, operations, goods movement, multimodal mobility, accessibility, evacuation efficiency, and provide benefits to disadvantaged communities. The criteria that are ultimately developed for CSIS need to account for these considerations. These comments also need to be considered in relation to the Local-Sponsored Project Initiation Document Evaluation Guidance.

Below are comments on the specific metric and tools identified in the Draft CAPTI Alignment Metrics:

EQI Tool: Overall, we have concerns with the application of the Equity Index Tool (EQI) in several of the CSIS metrics. The EQI wasn’t developed with a clear use case during development and was not initially intended for application to the CSIS. The methodologies, data, and determination of thresholds have not been adequately vetted by the Regional Agencies. Utilization of census blocks rather than tracts, results in a much higher margin of error in rural areas and difference in geographic coverage, which results in reducing areas in rural regions that should be considered disadvantaged due to inaccurate or insufficient data. There are also inconsistencies with AB 1550 and Justice 40 mapping tools.

Additionally, based on review of the (EQI Feb 2023 discussion draft) it states that Highway Performance Monitoring System (HPMS) data was used and claimed that the HPMS dataset contains all roads in the United States and car and truck AADT for highways and arterials. However, HPMS data is actually randomized samples of highways generally used for broadly assessing condition and operational conditions. This raises concerns about the Average Annual Daily Traffic (AADT) volume data being utilized.

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 benefits receiving a lower score if they differ from the predefined safety measures.

Vehicle Miles Travelled Metric: For the VMT metric, projects that result in no VMT change score 5 points. In alignment with CAPTI projects that do not significantly increase VMT should also be awarded 5 points. A VMT increase would be considered not significant if the Greenhouse Gas analysis shows a reduction of GHG with an insignificant increase in VMT. Additional information is needed on how the upper thresholds for the metric were determined to ensure it is appropriate.

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 AADT 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, routing, and market demand for goods. It is important to note that freight traffic is forecasted to increase in most highway corridors with or without proposed improvement projects. While it is appropriate to identify the DAC areas of concern based on freight Annual Average Daily Traffic, the CSIS weighting criteria should be focused on the emission reductions and safety benefits of the project.

ZEV Infrastructure Metric: The ZEV infrastructure metric establishes a very high number of chargers to receive maximum points. Unfortunately, many rural areas are impacted by the limits of the electrical grid capacity that may not be realistically capable of accommodating the required number of installations. The document does acknowledge this as a constraint of the metric, but it does not clarify how those projects would be scored. Further analysis and consideration should be given to scoring rural projects with electrical grid limitations.

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. If this criterion as currently proposed were to be applied to the Federal PROTECT funding program, which recognizes the need and allows for capacity projects to address community evacuation, it would put these critical community safety projects at risk of not being funded. 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 egress, as well as ingress for emergency responders must both be considered.

Thank you again for the opportunity to provide comments on the current Draft CSIS and CAPTI Alignment and Metrics. The shift from qualitative criteria to quantitative if not done with careful consideration has the potential to result in unintended consequences and unequitable funding decisions. Without the ability to competitively seek state partnership funding, rural regional priority projects will likely go unfunded, creating numerous safety, economic, and mobility challenges. NCTC looks forward to continuing to work collaboratively with the Department to address these issues of concern and to the development of CSIS criteria that can help guide investment towards implementing the CAPTI Guiding Principles.

Sincerely,

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