

		
<a href="http://www.ruralcountiestaskforce.org">www.ruralcountiestaskforce.org</a>		
<b>Maura Twomey, Vice Chair</b> Association of Monterey Bay Area Governments 831.883.3750	<b>Jerry Barton, Chair</b> El Dorado County Transportation Commission 530.642.5260	<b>Woodrow Deloria, Secretary</b> El Dorado County Transportation Commission 530.642.5263

March 14, 2016

California Transportation Commission  
 Attention: Will Kempton, Executive Director  
 1120 N Street, Room 2233  
 Sacramento, CA 95814

RE: Active Transportation Program - Cycle 3

Dear Mr. Kempton,

The RCTF is a partnership representing 26 rural county transportation planning agencies and local transportation commissions. The RCTF was created in 1988 to provide a direct opportunity for the small counties to remain informed, have a voice, and become involved with changing statewide transportation policies and programs. The RCTF was established as a joint effort between the California Transportation Commission (CTC) and the rural counties. We appreciate the continued partnership of the CTC as you continue to improve the Active Transportation Program (ATP). We commend staff for the work you are doing to help achieve balance in a discretionary program that looks to make progressive changes in mode choice across an increasingly diverse state.

**The Rural Difference**

While we appreciate the 10 percent ATP set aside for rural and small urban areas, it is our hope that Cycle 3 ATP will allow for the rural areas of California to be more competitive in the statewide program so that they can be a partner in improving active mobility across the statewide transportation system. The rural areas of California cover 41.5 percent of the total land area of the state and provide regional and interregional connectivity for millions of visitors and economic activities who rely on efficient and enjoyable access to recreation, tourism, and natural resources abundant throughout the rural counties. Given the expansive land area of the rural areas, opportunities to encourage or increase active transportation are much more challenging due to longer travel distances to access widely distributed land uses and activity centers, higher volumes of user or non-resident populations, and lower resident population density.

It has been recently stated at Town Hall meetings that a “one size fits all” approach does not work for the socio-economic and geographic diversities across the state. Consideration needs to be given to rural areas of California and how they vastly differ when it comes to mode opportunities and the ability to encourage and increase bicycling and walking. Typically the increases in bicycling and walking trips that can be realized in rural areas do not compare with similar improvements in urban areas when total trips are counted, VMT reduction is measured, and emissions reductions are calculated. However, active transportation trips in rural areas are no less important to those communities as well as their

importance in contributing to the statewide goals to improve modal choice, improve health, and reduce emissions. For example, an increase in active trips by 5% in a rural community will not have nearly the emissions reduction benefits of an urban area. However, that 5% reduction in auto trips may equate to a significant reduction in vehicle miles traveled for that community and rural region due to the travel characteristics of rural areas. Consequently, this seemingly small improvement may result in great benefits in quality of life, health, and air quality for that rural region. We hope that ATP evaluators will be cognizant of these realities as they consider the scoring of applications for projects in rural areas.

### **Disadvantaged Communities**

RCTF appreciates all of the recent dialogue regarding the Disadvantaged Community (DAC) component of the ATP. In Cycle 2, approximately half of our 26 members were capable of receiving the 10 available DAC points. The other half of our membership, 10 or more counties, did not receive the points and were therefore at a significant competitive disadvantage in the program. It is worth noting that in a recent survey, only one of the 26 RCTF Counties reported that they qualified as a DAC under the CalEnviroScreen criteria. We appreciate that the February 2016 version of the ATP guidelines allows for communities with a population less than 15,000 to use data at the census block group level. We also appreciate that unincorporated communities may use data at the census place level. While the process of determining census block and place data may be cumbersome, the opportunity to demonstrate smaller areas which are in fact disadvantaged within a county or community is beneficial to rural areas. We also support the inclusion of Option 4; "Other," which allows applicants to include an assessment of why their project should be considered disadvantaged. Our members also support the opportunity for applicants to identify schools that meet the DAC school lunch program criteria, within a 2 mile radius of any project, even if the particular project is not designated a safe routes to school project. We are confident that active transportation projects located within a two mile radius of a school will benefit students, especially near schools which meet the school lunch program DAC criteria.

We understand that the CTC is considering a tiered approach to the scoring of DAC criteria. We are fairly certain that the geographic areas of the state that would receive full points are largely located in urban areas. We would appreciate if the CTC staff could conduct a detailed analysis on the impacts of a tiered DAC point system on rural applicants and share that analysis with ATP stakeholders before such a system is implemented.

Thank you for the opportunity to comment on this important program.

Sincerely,



Jerry Barton  
Senior Transportation Planner  
Chair, Rural Counties Task Force

Cc: Laurie Waters, CTC