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**From:** Marisa Lundin  
**Sent:** Tuesday, March 29, 2016 3:38 PM  
**To:** ctp2040@DOT  
**Subject:** CTP2040 30-day Public Review Period 02/29/16 - 03/29/16 Comments

Below is the result of your feedback form. It was submitted by Marisa Lundin on March 29th, 2016 at 03:38PM (PDT).

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org: California Rural Legal Assistance, Inc.  
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comments: Gabriel Corley  
CTP Project Manager  
Division of Planning, MS-32  
California Department of Transportation  
P.O. Box 942874  
Sacramento, CA 94274-0001

RE: Written comments on Draft 2040 California Transportation Plan submitted pursuant to February 29th solicitation for public comment

Dear Mr. Corley:

Thank you for this opportunity to provide comments on the draft 2040 California Transportation Plan (CTP), published for comment by CalTrans on February 29th, with written comments due to CalTrans by March 29th, 2016.

California Rural Legal Assistance, Inc. (CRLA) is a statewide non-profit law firm that represents low-income individuals and farmworkers on a variety of issues related to housing, labor and employment, education, civil rights, and public benefits. The Community Equity Initiative (CEI) is a program within CRLA focused on improving infrastructure and service inequities in rural disadvantaged, unincorporated communities (DUCs). We tailor our comments to the effects on the rural, low income and farmworker communities that CRLA serves.

I. Rural transportation challenges and GHG reduction strategies to meet those needs

California is emerging as a leader in the global effort to reduce greenhouse gas emissions (GHG). A large component of this strategy involves GHG reduction strategies accomplished by transportation mode shift, smarter land use policies, and intelligent investment in transportation projects that will discourage personal vehicle miles traveled (VMTs). The trend in GHG reduction strategies in California encourages mode shift in urban areas and promotes infill development. This is a highly effective strategy and a much needed departure from the urban sprawl that has put considerable strain on municipal resources and contributed significantly to congested highways. Sprawl has contributed to driving up housing and transportation costs, leaving some urban communities without adequate services and confronting high poverty rates. It also has meant that some suburban and rural communities are out of reach for vulnerable populations, most in need of affordable housing and transporta!

tion. Urban-focused projects and funding geared toward GHG reduction are an integral part of stemming the progression of climate change, but transportation equity is critical to California's economic success and the needs of rural California cannot be ignored and require particular attention. CalTrans will miss a key piece of the puzzle by excluding specific consideration of how mode shift and related transportation improvements in rural California can contribute to the effort to stem climate change.

a. Characteristics of DUCs in California

Thirteen percent of Californians live in rural areas. 310,000 people live in disadvantaged unincorporated communities. DUCs in California often face similar challenges throughout the state: access to sufficient quantity and adequate quality of water; lack of basic infrastructure; aging or completely absent wastewater and sewer systems; proximity to industrial or agricultural operations that contaminate drinking water, soil and air quality; linguistic isolation; and, poor local planning that has resulted in residents having to travel great distances to access critical services, education, and employment. Residents of low-income communities typically lack access to public transportation, face unsafe modes of transportation, encounter high levels of transportation insecurity and pay a disproportionate amount of their income to transportation costs.

Many residents of DUCs are farmworkers. This is due to three main reasons: a lack of decent, affordable housing in more densely settled areas; a lack of equitable housing opportunity in communities near where they work; and low wages that deprive farmworkers of much choice when it comes to finding housing. Farmworkers, even those living in DUCs, often travel great distances to reach the fields in which they are working. This population faces significant issues in securing adequate and decent affordable housing and transportation challenges go hand in hand with housing issues. Farmworkers can find some relief to their transportation challenges, though the relief is piecemeal and inconsistent. Some employers might offer vanpool services at a reduced rate, but for the most part farmworkers are required to commute long distances in unsafe transportation modes in order to both work and live with their families. There is a tremendous opportunity to reduce VMTs by analyzing t!

he driving patterns of farmworkers (due to employment) while simultaneously accomplishing the co-benefit of reducing the transportation cost burden to this vulnerable population. There also are equitable considerations based on race, national origin, familial size and other factors leading to discrimination in transportation and living patterns.

II. Recommendations

Rural residents of DUCs all too often must travel two to three times as far as people living in urban areas in order to access key destinations, and low income, rural, vulnerable rural populations face special challenges. Therefore, CalTrans should include a separate section in the CTP analyzing the transportation habits of rural, farmworker and DUC populations and the unique strategies available to address those needs. Policymakers in California have begun to see the value in analyzing the transportation needs of these populations. The 2016 Affordable Housing Sustainable Communities (AHSC) strategy prepared by the Strategic Growth Council included a 10% rural set aside for projects that will be available only to rural applicants. This set aside was the result of the efforts by rural advocates to point out the inherent density bias that existed in the project criteria for the AHSC in the first round of competitive funding and the opportunity to achieve AHSC strategy goals !

in rural areas. This is a start, but it still excludes many low-income and farmworker communities and DUCs when it comes to competitive funding for infrastructure, water, transportation and affordable, equitable housing needs.

The current CTP 2040 draft includes several references about the unique character and needs of rural areas, but that message will be lost unless the CTP includes a dedicated section specifically addressing rural transportation needs, innovative strategies to both meet those needs and reduce GHG emissions, and special consideration of funding strategies and committed set-asides to meet those needs.

CalTrans can accomplish this goal by gathering more data and analyzing the need for equitable, affordable transportation programs, projects and funding for rural, agricultural, low income and disadvantaged equal justice communities and by requiring regional and local governments to gather more data surrounding those unique

transportation habits and needs of rural California. The State, regional and local transportation planners should devote a portion of their budget to analyzing and addressing the transportation needs of residents in low-income and farmworker communities. Rural advocates have pointed out for years that residents in rural areas drive exponentially more miles than their urban counterparts, so even though fewer individual drivers might be affected by a GHG reduction project in a rural area over an urban area, the net reduction in VMTs could be more in the rural area.

Farmworkers, low-income residents, and residents of DUCs, many of whom are vulnerable populations requiring particular equitable solutions, have seen decades of disinvestment in their communities due to a multitude of reasons, including institutional and individual discrimination. This cycle of disinvestment will continue if the substantial amount of funds in California dedicated to improving transportation and reducing GHG emissions is exclusively or primarily funneled into urban or suburban areas.

## Conclusion

Low-income communities in urban areas will see tremendous benefits as their transportation costs are alleviated and their health improves due to fewer vehicle emissions. Rural California must have the same opportunity to see these same benefits. CalTrans can undertake and require research into the GHG reduction strategies that are possible in rural California and so it should by incorporating specific recommendations in the CTP to address the transportation needs in rural farmworker and low income communities and DUCs.

We thank you for this opportunity to provide written comments.

Sincerely,

Marisa Christensen Lundin  
Registered Legal Services Attorney  
California Rural Legal Assistance, Inc.

submit: [Submit Comments](#)