



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

March 17, 2023

Christopher Coes  
Assistant Secretary for Transportation Policy  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

**RE: Request for Information, Equitable Transportation Community Explorer Tool and Index Methodology [Docket No. DOT-OST-2023-0020-0001]**

*Submitted electronically to eRulemaking Portal*

Dear Mr. Coes:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to offer feedback on the updated Transportation Disadvantaged Census Tracts Tool, now named U.S. DOT Equitable Transportation and Community Explorer Tool, that supports the Administration's Justice40 initiative. RCRC is an association representing forty of California's fifty-eight counties, and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. As such, our comments pertain to the tool's relevance to project areas located within California.

California frequently utilizes a screening methodology tool called CalEnviroScreen to identify communities disproportionately burdened by multiple sources of pollution. The practical effect, unfortunately, has resulted in many rural communities in California being underserved especially as it relates to receiving funding assistance. CalEnviroScreen, for instance, is heavily weighted by criteria pollutants from vehicle emissions and unfairly limits rural county eligibility when used *solely* to determine disadvantaged communities, rather than incorporating other indicators such as communities that are low income, have high unemployment rates, are sensitive populations (such as elderly or disabled), or have low levels of educational attainment.

RCRC appreciates the multi-component methodology used in the Equitable Transportation and Community Explorer (ETCE) Tool to evaluate disadvantage and prioritize investments in a data-driven manner. Overall, RCRC is supportive of a unique tool to inform transportation-related decision-making of discretionary funds and offers the

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following feedback on certain components that comprise the ETCE Tool's cumulative impacts.

### ***Health Vulnerability***

- We appreciate the inclusion of access to medical care and hospital proximity as an indicator. Too often rural California residents must travel long distances to access care. Not only do rural hospitals and healthcare facilities struggle to attract trained healthcare professionals to meet community needs, but rural California hospitals are experiencing financial distress at an alarming rate. Hospital closures will exacerbate distance and miles traveled, as well as worsen health outcomes.<sup>1</sup>

### ***Socioeconomic Vulnerability***

- Socioeconomic status and household characteristics, such as income levels, unserved and underserved access to high-speed internet, and populations over age 65, are important values to capture qualifying areas in rural California and we appreciate their inclusion in the Tool.

### ***Transportation Insecurity***

- The transportation access variable should also consider incorporating food deserts as an additional indicator. The lack of transportation infrastructure is a key barrier for small, rural areas to access affordable nutritious food.<sup>2</sup>
- The “no personal vehicle” indicator is correct to point out the general lack of public transportation options in rural areas and, therefore, the importance of a personal vehicle to access a suite of essential services. The lack of personal transportation is particularly acute in farmworker communities.
- RCRC suggests the transportation-related fatalities indicator ensure its calculations capture data underlying the Rural Opportunities to Use Transportation for Economic Success (ROUTES) initiative; as you know, ROUTES seeks to address rural infrastructure disparities. Key findings include that 43 percent of all traffic fatalities in 2020 were in rural areas, but only 19 percent of the U.S.

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<sup>1</sup> ANA B. IBARRA AND NICOLE FOY, *After Madera's hospital closure, could others follow?* Published January 20, 2023. <https://calmatters.org/health/2023/01/hospital-closure/>

<sup>2</sup> According to USDA June 2009 Report to Congress, *Access to Affordable and Nutritious Food Measuring and Understanding Food Deserts and Their Consequences*: “Overall, findings show that a small percentage of consumers are constrained in their ability to access affordable nutritious food because they live far from a supermarket or large grocery store and do not have easy access to transportation. Urban core areas with limited food access are characterized by higher levels of racial segregation and greater income inequality. **In small-town and rural areas with limited food access, the lack of transportation infrastructure is the most defining characteristic.**” [Emphasis added]

population lives in rural areas and 31 percent of total vehicle miles traveled (VMT) were in rural areas in 2020.<sup>3</sup> Moreover, the fatality rate per 100 million VMT was 1.7 times higher in rural areas than in urban areas.<sup>4</sup>

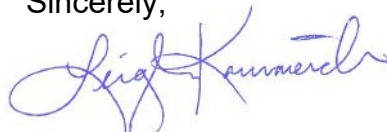
### ***Climate and Disaster Risk Burden***

- In many cases, California's propensity for extreme heat, wind, snow, and drought events often results, in intentional, discreet power outages inflicted by large investor-owned electric utilities to avoid risk of its infrastructure igniting catastrophic wildfires. This will make it even more challenging to electrify rural transportation, buildings, and equipment to meet the Administration's climate change goals.
- California is particularly susceptible to natural disasters, including wildfires, floods, and earthquakes. RCRC appreciates the inclusion of these hazards and the recognition of the communities' long-term financial losses associated with these events resulting in greater investments needed to recover.

Again, we appreciate the interactive tool to aid applicants applying for U.S. DOT funds. Relatedly, we urge U.S. DOT to allow a broad range of applicants including local governments, joint powers authorities (JPAs), non-profit organizations and public-private partnerships to qualify for DOT's competitive grants. As with many competitive grant processes, small municipal governments often do not have the staffing resources or expertise to devote to accessing or implementing these types of projects. Organizationally, RCRC seeks to provide technical assistance to leverage discretionary grant funding opportunities for under resourced rural counties, especially for infrastructure projects. Lastly, we would also like to acknowledge the challenges of requiring local agency matching funds to draw down federal assistance and discretionary grant funds. We urge U.S. DOT to consider utilizing the ETCE Tool in the future to potentially reduce or eliminate these local match barriers in qualifying disadvantaged jurisdictions so more projects come into fruition in Justice40 communities.

Thank you for your consideration of our comments.

Sincerely,



LEIGH KAMMERICH  
Policy Advocate

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<sup>3</sup> See <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813336>

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