

STAFF REPORT



MEETING DATE: October 26, 2023
SUBJECT: Correspondence
AGENDA ITEM: 7-3
STAFF CONTACT: Amy Lindsey, Administrative Associate

DISCUSSION:

Attached and summarized below is correspondence determined to be of interest to the board of directors.

INCOMING CORRESPONDENCE

Date	From	Subject
8/31/23	California Department of Transportation, Office of Regional and Community Planning, Chief, Erin Thompson	Letter of Award – Sustainable Transportation Planning Grant Award for the Shasta Regional Planning Dashboard.
9/20/23	Plumas County Transportation Commission, Executive Director, James Graham	Letter of Request for Coordination and Consultation on the Plumas County Regional Transportation Plan 2025.
10/12/23	California Department of Conservation, Division of Land Resource Protection, Conservation Programs Manager, Shanna Atherton-Bauer	Letter regarding – Application for Conservation Grant in Shasta County

OUTGOING CORRESPONDENCE

Date	To	Subject
8/30/23	California Department of Transportation, Office of Strategic Safety and Implementation, Highway Safety Improvement Program, Branch Chief, Abdelrahman Beshair	Letter of Support for proposed State Route (SR) 273 Safety Lighting Project.
9/8/23	California Air Resources Board, Executive Officer, Honorable Steven S. Cliff, Ph.D.	Letter of Concern to Mandated Innovative Clean Transit (ICT) Regulations.
9/12/23	Division of Financial Programming, MS 82, Department of Transportation, Office Chief, Kien Le	Letter of Formal Amendment No. 5 to the Shasta 2023 Federal Transportation Improvement Program (FTIP).

A blue ink signature of Sean Tiedgen, written in a cursive style.

Sean Tiedgen, AICP, Executive Director
Attachment: SRTA Correspondence Letters

California Department of Transportation

DIVISION OF TRANSPORTATION PLANNING
P.O. BOX 942873, MS-32 SACRAMENTO, CA 94273-0001
(916) 261-3326 | TTY 711
www.dot.ca.gov



August 31, 2023

SENT VIA E-MAIL

On behalf of the California Department of Transportation (Caltrans), Division of Transportation Planning, we are pleased to congratulate you on your Sustainable Transportation Planning Grant award.

Sustainable Transportation Planning Grant Program					
Grant Award Fiscal Year	2023-24	Grant Category	Sustainable Communities Competitive		Grant Fund Source FTA 5304
Project Title	Shasta Regional Planning Dashboard				
Grantee/Agency	Shasta Regional Transportation Agency (SRTA)				
Executive Director	Sean Tiedgen				
Grantee/Agency Contact	Mehdi Moeinaddini				
Sub-Recipient(s)	City of Shasta Lake				
Caltrans District Contact(s)	Kathy Grah, Brenda Caruso				
Caltrans District Contact(s) E-mail	kathy.grah@dot.ca.gov, brenda.caruso@ot.ca.gov				
Grant Award	Local Match (Cash)	Local Match (In-Kind)	Total Local Match	% Local Match	Total Project Cost
\$500,000	\$73,831	NA	\$73,831	12.87%	\$573,831
Conditions of Award Due to Caltrans		Grant Expiration Date		Final Invoice Due	
9/28/23		6/30/26		8/31/26	
* The final contractually agreed upon Local Match and Fund Source are located on the Grant Application Cover Sheet and Project Cost and Schedule. Any change in Local Match that increases/decreases the Total Project Cost must be approved by Caltrans and may require a Formal Amendment. Each invoice must include the contractual/agreed upon local match % - any deviation to this amount requires an approved Tapered Local Match Amendment prior to invoice submittal. Any change to the Local Match Fund Source requires prior Caltrans approval and an Administrative Amendment.					

Next Steps

1. The Caltrans District Grant Manager will schedule a Conditional Award Meeting with your agency soon.
 - The attached specific and general conditions and project revisions necessary to accept grant funding will be discussed at this meeting.
2. The required conditions must be submitted to the Caltrans District Grant Manager no later than the date listed in the table above.
 - Failure to satisfy these conditions will result in the forfeiture of grant funds.
3. The Caltrans District Grant Manager will review and approve all items required to fulfill the attached specific and general conditions.
4. Once the required conditions are met and the agreement is executed, the Caltrans District Grant Manager will:
 - Send a Notice to Proceed letter (for MPO/RTPAs, this will happen after the OWP/OWPA formal amendment is processed). *Grant work cannot begin until the Notice to Proceed letter is received by your agency.*
 - Coordinate and schedule a grant kick-off meeting with your agency.

If you have questions concerning your Conditional Grant Award, please reach out to your Caltrans District contact listed in the table above.

Sincerely,



ERIN THOMPSON
Chief, Office of Regional and Community Planning

Attachments:
Specific and General Conditions

Sustainable Transportation Planning Grant Program

Grant Award Specific and General Conditions

Specific Conditions

If Specific Conditions have been identified for this grant, they will be listed below. Please make all necessary revisions to the Grant Application Cover Sheet, Scope of Work (SOW), and/or the Cost and Schedule, and complete the right column to indicate where the specific conditions were addressed.

Specific Conditions	Conditions Addressed List Document, Section & Page(s)
1. The public engagement plan could be better developed and add more details.	
2. Recommend adding a training component for several staff members to reduce reliance on consultants for facilitation and updates.	
3. Revise Cost and Schedule to start in November 2023 instead of July.	
4. Ensure the final product is reviewed and submitted to Caltrans.	
5. Ensure Scope of Work and Cost and Schedule Tasks/deliverables are matching	

Specific Conditions	Conditions Addressed List Document, Section & Page(s)

General Conditions

Please review the General Conditions below and complete them, as necessary. Most of these items are outlined in the Grant Application Guide, Ch. 6 and Appendix B.

- **Scope of Work (SOW) and Project Cost and Schedule** (Refer to Grant Application Guide, Appendix B Checklists) These are frequently missed requirements:
 - Project Management stand-alone tasks, staff and/or consultant coordination are not allowed. Project Management activities must be charged to the tasks in which they accrued.
 - Include tasks for a kick-off meeting with Caltrans, invoicing, quarterly reporting, and Board adoption or acceptance.
 - Ensure the consultant procurement task includes the following deliverables: Request for Proposal (RFP), executed consultant contract, and a copy of your agency's procurement procedures.
 - Unless prior arrangements are made, the earliest project start date is November 1, 2024, with an end date of June 30, 2026. The Project Cost and Schedule will need be updated to reflect your proposed start date. At least one Task must extend to the grant expiration date on June 30, 2026.
 - Indirect Costs - For Local Government Agencies requesting to bill for indirect costs: Indirect costs must be identified in the SOW and Project Cost and Schedule, and the indirect cost rate included at the bottom of the Project Cost and Schedule.
- **Grant Application Cover Sheet and Project Cost and Schedule**
 - Ensure the grant award, local match, and total project costs are consistent with the award letter amounts.
- **Grant Application Cover Sheet** - Must identify the specific source of cash and in-kind local match funds; and must identify the agency providing the local match.
 - If your agency is using staff time as a cash match, the application cover sheet must identify the source of local match funds for staff time (e.g., General Fund).
 - Direct grantee staff time is not an allowable in-kind match and must be identified as cash match.
- **Third Party In-Kind Valuation Plan, if applicable** - Third-party in-kind contributions consist of goods and services donated from outside the grantee's agency (e.g., printing, facilities, interpreters, equipment, advertising, staff time, and other goods or services). If utilizing third-party in-kind contributions to satisfy the local match requirement:
 - Ensure in-kind contribution information is identified on the Grant Application Cover Sheet and Project Cost and Schedule.
 - To clarify, sub-recipient staff time, if reimbursed, is considered cash match. If donating their time, it is considered in-kind.
 - Submit a Third-Party In-kind Valuation Plan. The District can provide a copy of the valuation plan checklist and template.
- **Overall Work Program (OWP)** – In accordance with the *OWP and Grant Amendment Guidelines*, submit a current Draft Fiscal Year OWP and OWP Agreement (OWPA) Amendment, which includes the following:
 - The Draft OWP/OWPA Amendment must include the Amendment Transmittal Memo, OWPA, OWP Budget Summary, and a standalone Work Element. These items must show

- consistent funding information for the grant project and include the full grant and local match amounts.
 - The Work Element title must be consistent with the project title identified on the Grant Application Cover Sheet. The Work Element name and number must remain the same until the project is completed.
 - In the Work Element, separate Tasks and Product Deliverables that will be accomplished in the current FY OWP from Tasks and Products that will be accomplished in future FYs. This can be accomplished by inserting a sub-heading for "current" and "future" work in the narrative.
 - A Draft Board Resolution to amend the OWP/OWPA and program the entire grant amount and local match funds.
- **Ensure Consistency** - All changes made to the Grant Application Cover Sheet, SOW, and Project Cost and Schedule are made consistently in all documents.

Grant Administrative Requirements

Refer to the Grant Application Guide, Ch. 6, and the MPO/RTPA Master Fund Transfer Agreement for an overview of the Grant Administrative Requirements that must be adhered to over the life of the project. In summary:

- **Federal Requirements –**
 - Submit Disadvantaged Business Enterprise (DBE) forms with every invoice as well as biannual reports Caltrans. If contracting with consultants, prior to solicitation, it is your agency's responsibility to work with your District Regional Planning Liaison to determine DBE participation. Additional Information on DBE requirements can be found at the following webpage:
<https://dot.ca.gov/programs/transportation-planning/regional-planning/dbe>
 - Complete and implement a Title VI Plan consistent with Federal Transit Administration Circular 4702.1B. If your Title VI Plan is expiring or has expired, this grant award will be contingent upon submitting to Caltrans a current, Board adopted, Title VI Plan.
- **Third Party Contracts –** Competitive consultant procurement, i.e., Request for Proposals (RFP) is required for all grant projects
 - If there is a consultant on-board, ensure the process to procure the consultant was a competitive process (documentation must be provided to Caltrans); the grant work must have been part of the original RFP
 - If using an on-call consultant list, the process for establishing the list must be competitive and less than five years old (documentation must be provided to Caltrans)
 - If the consultant helped to prepare the Project Scope of Work or grant application, they shall not be considered in the consultant procurement
- **Quarterly Reporting –** Quarterly Progress Reports (a narrative of completed project activities) are submitted on a quarterly basis
- **Invoicing and Financial Requirements –**
 - Maintain a proper accounting system (MS Excel is unacceptable)
 - Request for Reimbursements/invoices (RFRs) at least quarterly, but no more than monthly
 - One-time, lump sum invoices are not allowed

- If requesting reimbursement of indirect costs, a copy of the ICAP/ICRP acceptance letter must be submitted with the first invoice
- Local match commitments must be satisfied with every RFR/invoice, including any local match amount above the minimum amount. If you are unable to meet this commitment, coordinate with your district Contract Manager.
- All work must be completed by June 30, 2026.
- Final RFR/invoice and the final product are due no later than August 31, 2026.
- The final RFR/invoice will not be processed without the final product
- An Indirect Cost Allocation Plan/Indirect Cost Rate Proposal (ICAP/ICRP) must be submitted each year to the Inspector General Independent Office of Audits and Investigations for approval. Instructions for submitting an ICAP/ICRP are available at the following webpage: <https://ig.dot.ca.gov/resources>
- **Grant Amendments** - Proposed changes to the Grant Application Cover Sheet, SOW, and Project Cost and Schedule (e.g., local match amount, fund source, movement of funds) will require an Amendment and Caltrans approval. Please contact Caltrans for guidance on this process.



PLUMAS COUNTY TRANSPORTATION COMMISSION

1834 East Main Street, Quincy, CA 95971 – Telephone (530) 283-6268 Facsimile (530) 283-6323
Jim Graham, Executive Director

September 20, 2023

Shasta Regional Transportation Agency
Attn: Sean Tiedgen, AICP, Executive Director
1255 East Street
Suite 202
Redding, CA 96001

Re: Plumas County Regional Transportation Plan 2025

Dear Mr. Tiedgen,

The Plumas County Transportation Commission (PCTC) is in the process of developing a Regional Transportation Plan update for the 2025 – 2045 planning horizon.

Coordination and consultation with adjacent MPOs/RTPAs is recommended by the California Transportation Commission's Regional Transportation Plan Guidelines and PCTC recognizes the value in this. Our project team is soliciting any potential collaborative projects, and any comments your agency may have for inclusion in the Plumas County 2025 Regional Transportation Plan. The project schedule and updates on the development of the RTP and the CEQA process will be posted on www.plumascountyrtp.com.

If you have any questions or would like additional information, feel free to contact me using the contact information below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Graham", with a stylized flourish at the end.

James Graham, Executive Director
Plumas County Transportation Commission
jimgraham@countyofplumas.com
(530) 283-6169



California
Department of Conservation
Division of Land Resource Protection

Gavin Newsom, Governor
David Shabazian, Director

October 12, 2023

Sean Tiedgen, Executive Director

Shasta Regional Transportation Agency

Via email: stiedgen@srta.ca.gov

Re: Application for Conservation Grant in Shasta County

Dear Sean,

The Sustainable Agricultural Lands Conservation (SALC) Program is a component of the Strategic Growth Council's Affordable Housing and Sustainable Communities (AHSC) Program. SALC supports California's greenhouse gas emissions reduction goals by making strategic investments to protect agricultural land from conversion to more GHG-intensive uses. Avoiding conversion to urban or rural residential development promotes housing development within existing urban and suburban areas, supports the agricultural economy and food security, and ensures open space remains available.

SALC funds acquisition of conservation easements or fee title with deed restrictions equivalent to a conservation easement. A conservation easement is a voluntary, perpetual, recorded deed restriction that limits non-agricultural uses and prohibits subdivision of the property. The applicants would hold and monitor the easement to ensure its terms are fulfilled.

Pursuant to the SALC funding guidelines, I am providing you notice of two applications for conservation easements in Shasta County by Shasta Land Trust (two projects).

SALC projects must "support implementation of an adopted or draft sustainable communities strategy or, if a sustainable communities strategy is not required for a region by law, a regional plan that includes policies and programs to reduce greenhouse gas emissions." (Public Resources Code section 75211(b).) Attached are copies of the notifications that the applicant provided to the county planning directors. These letters describe the locations of the projects.

SALC staff are reviewing all applications submitted this round and expect that awards will be made in mid-December 2023. If you have comments about how this project may or may not meet this criterion, please contact me with any comments by November 12, 2023, so that we can consider the comments when evaluating the projects.

Sincerely,

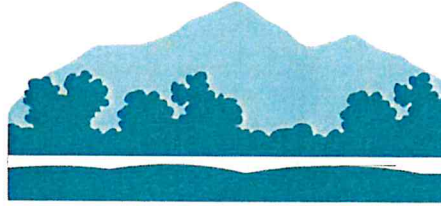
Shanna Atherton-Bauer

Shanna Atherton-Bauer
Conservation Programs Manager
shanna.atherton@conservation.ca.gov

Attachments

Applicant letter to Planning Director

SHASTA LAND TRUST



August 21, 2023

Paul Hellman, Planning Director
1855 Placer Street, Suite 102
Redding, CA 96001

Subject: Sustainable Agricultural Lands Conservation Program; Intent to Apply

Dear Paul:

This letter is to inform you that Shasta Land Trust intends to apply for easement acquisition grant funding under the Sustainable Agricultural Lands Conservation Program (SALC), which is a component of the Strategic Growth Council's Affordable Housing and Sustainable Communities Program. The agricultural acquisition grant funding would be used to purchase an agricultural conservation easement on approximately 5,260 acres identified as Shasta County assessor's parcel numbers: 095-120-001, 093-240-003, 095-010-027, 093-240-006, 093-240-004, 093-260-010, 093-260-004, 093-260-001, 093-240-005, 095-010-028, 093-170-009, 093-170-005, 093-260-021, and 095-120-002 as shown in the attached map.

An agricultural conservation easement is a recorded restriction on title that limits non-agricultural uses and prohibits subdivision of the property. The easement would ensure that, in perpetuity, this land would not be converted to non-agricultural uses. Shasta Land Trust would hold and monitor the easement to ensure its terms and conditions are adhered to and properly fulfilled.

The Shasta Land Trust is a private non-profit 501(c)3 corporation that exists to conserve agricultural land in Shasta County by acquiring and holding agricultural conservation easements and/or fee title interests.

The Strategic Growth Council will consider the Shasta Land Trust's grant application for funding at its December 2023, meeting. Questions or concerns may be directed to the Department of Conservation, which administers SALC on behalf of the Strategic Growth Council and the Natural Resources Agency:

Department of Conservation
Division of Land Resource Protection
715 P Street, Mail Stop #1904
Sacramento, CA 95814
(916) 324-0850 salcp@conservation.ca.gov

Sincerely,


Paul Viennet
Executive Director

CONSERVING THE BEAUTY, CHARACTER, AND DIVERSITY OF SIGNIFICANT LANDS IN FAR NORTHERN CALIFORNIA

530.241.7886

1768 WEST STREET · REDDING, CALIFORNIA 96001

SHASTALANDTRUST.ORG



IMPORTANT AGRICULTURAL LAND POTENTIAL PROJECT

BONNIE CRAIGS RANCH (5,255 ACRES)



FEATURES:

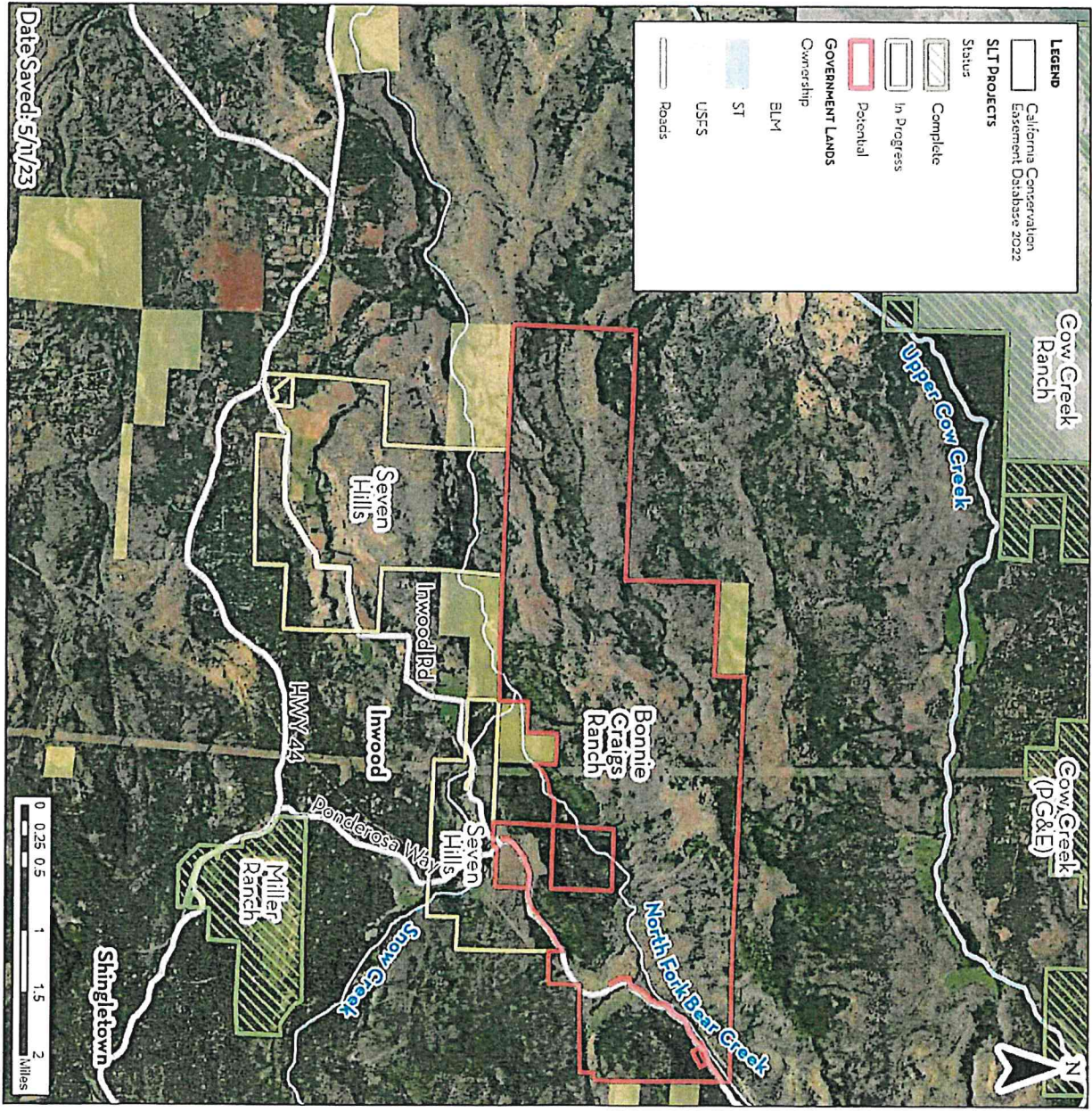
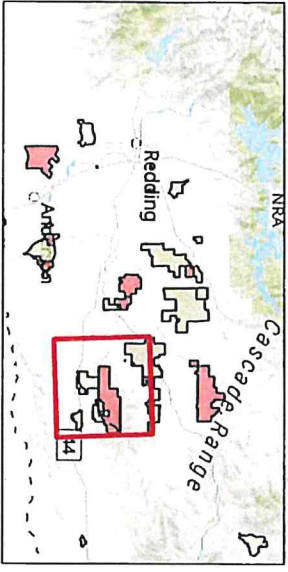
- Extensive open space utilized for cattle grazing including oak woodland and timberland
- Zoned Exclusive Agricultural and Agricultural Preserve
- 2.5 miles of North Fork Bear Creek, 3 miles of Snow Creek, Spring fed irrigation system
- Extensive grazing land

CONSERVATION VALUES:

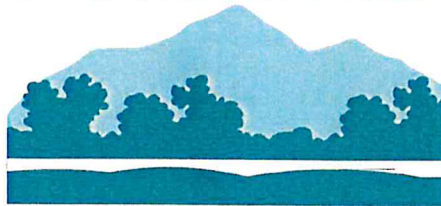
- Agricultural values (livestock grazing, hay production, and apairy operations)
- Wildlife habitat and riparian corridors
- Open space and scenic viewshed
- Protection of aquatic resources

CO-BENEFITS:

- Protection of land of environmental significance
- Protection of watershed health
- Protection of native plants and animals
- Protection of habitat connectivity and wildlife corridors
- Protection of open space and viewsheds
- Protection of groundwater
- Retention of local jobs and agricultural revenue
- Retention of entrepreneurial opportunities
- Avoidance of spending on municipal services for dispersed development
- Access to affordable nutritious food
- Outdoor access



SHASTA LAND TRUST



August 21, 2023

Paul Hellman, Planning Director
1855 Placer Street, Suite 102
Redding, CA 96001

Subject: Sustainable Agricultural Lands Conservation Program; Intent to Apply

Dear Paul:

This letter is to inform you that Shasta Land Trust intends to apply for easement acquisition grant funding under the Sustainable Agricultural Lands Conservation Program (SALC), which is a component of the Strategic Growth Council's Affordable Housing and Sustainable Communities Program. The agricultural acquisition grant funding would be used to purchase an agricultural conservation easement on approximately 381 acres identified as Shasta County assessor's parcel numbers: 057-290-005, 057-270-019, 057-260-031, 057-270-020, and 057-260-026 as shown in the attached map.

An agricultural conservation easement is a recorded restriction on title that limits non-agricultural uses and prohibits subdivision of the property. The easement would ensure that, in perpetuity, this land would not be converted to non-agricultural uses. Shasta Land Trust would hold and monitor the easement to ensure its terms and conditions are adhered to and properly fulfilled.

The Shasta Land Trust is a private non-profit 501(c)3 corporation that exists to conserve agricultural land in Shasta County by acquiring and holding agricultural conservation easements and/or fee title interests.

The Strategic Growth Council will consider the Shasta Land Trust's grant application for funding at its December 2023, meeting. Questions or concerns may be directed to the Department of Conservation, which administers SALC on behalf of the Strategic Growth Council and the Natural Resources Agency:

Department of Conservation
Division of Land Resource Protection
715 P Street, Mail Stop #1904
Sacramento, CA 95814
(916) 324-0850 salcp@conservation.ca.gov

Sincerely,

Paul Vienneau
Executive Director

CONSERVING THE BEAUTY, CHARACTER, AND DIVERSITY OF SIGNIFICANT LANDS IN FAR NORTHERN CALIFORNIA

530.241.7886

1768 WEST STREET · REDDING, CALIFORNIA 96001

SHASTALANDTRUST.ORG



IMPORTANT AGRICULTURAL LAND POTENTIAL PROJECT

LITTLE BEAR CREEK RANCH (380 ACRES)



FEATURES:

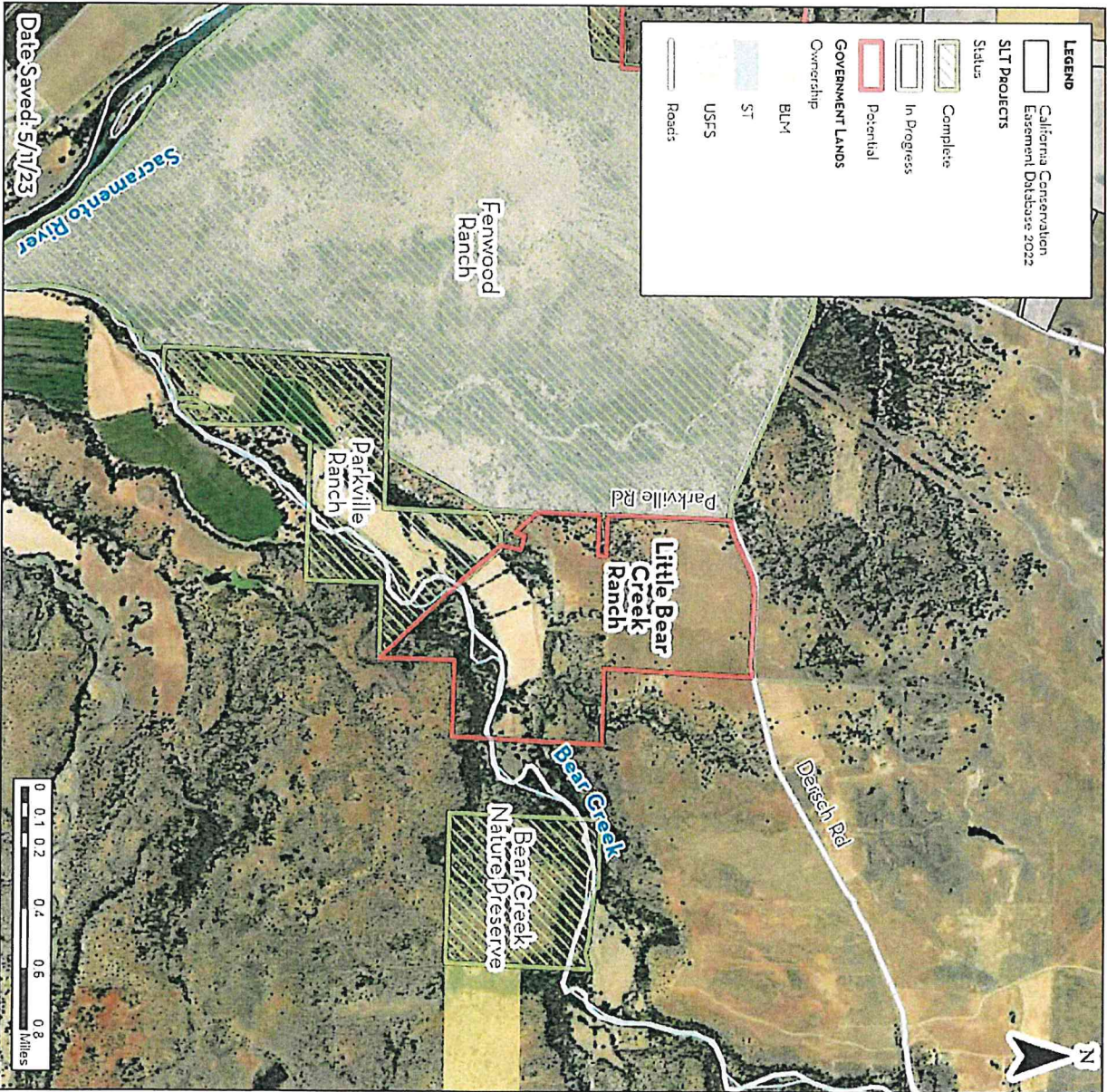
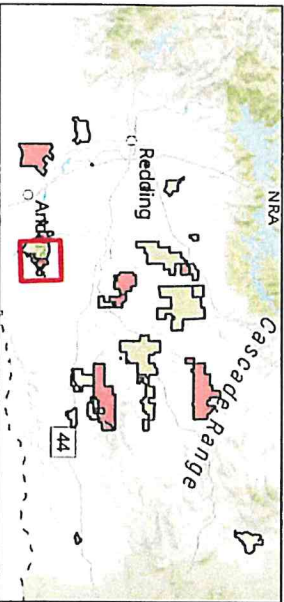
- 42 acres of irrigated cropland, 12 acres of dry pasture, including 27 acres of Prime Farmland and 5 acres of Farmland of Local Importance, 260 acres of dryland cattle grazing, and 50 acres of open space dedicated as wildlife habitat
- Zoned Exclusive Agriculture - Agricultural Preserve
- 5 miles of Bear Creek frontage

CONSERVATION VALUES:

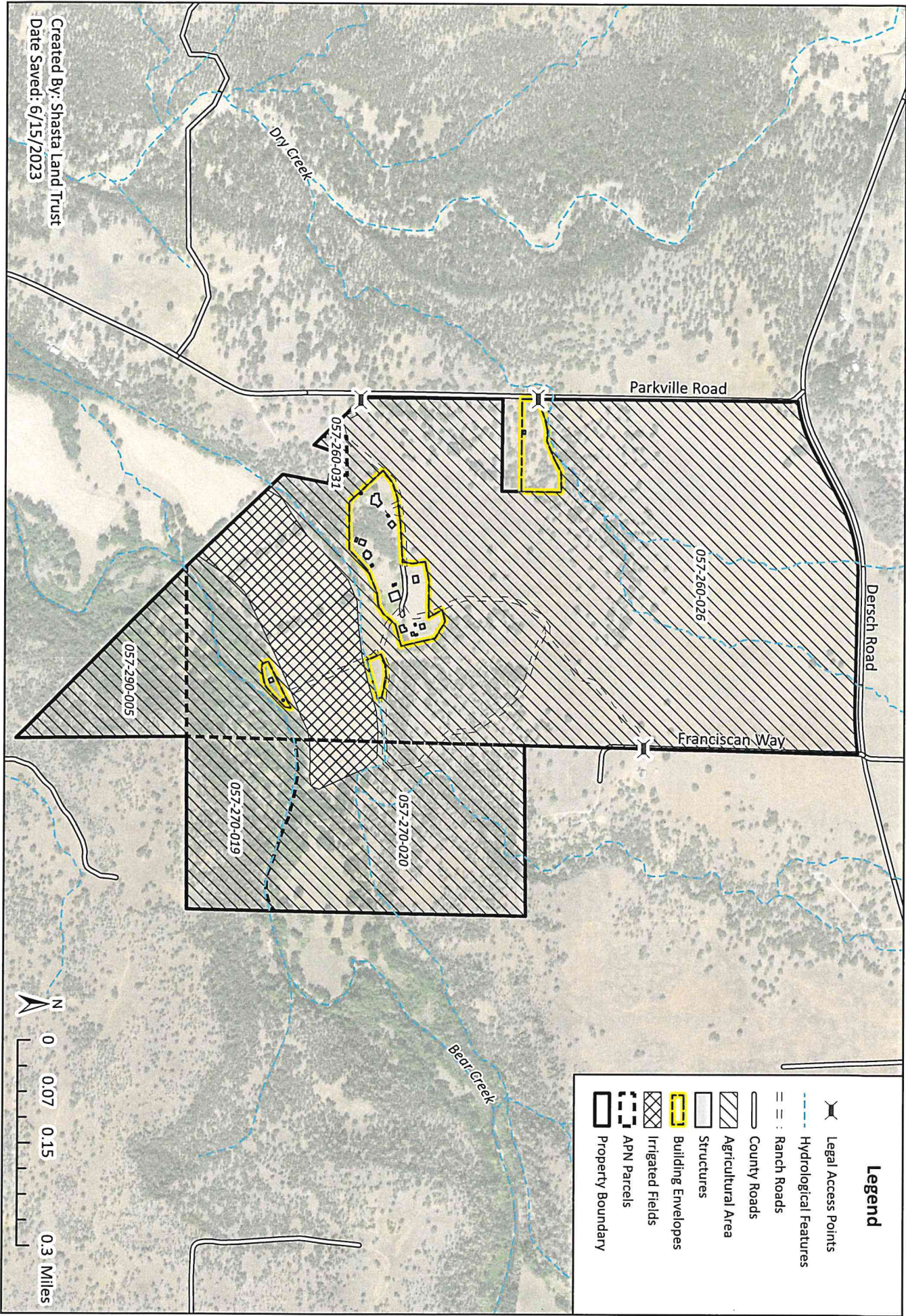
- Agricultural values (livestock grazing and hay production)
- Wildlife habitat including vernal pools and riparian corridor
- Open space and scenic viewshed
- Protection of aquatic resources

CO-BENEFITS:

- Protection of watershed health
- Protection of native plants and animals
- Protection of habitat connectivity and wildlife corridors
- Protection of open space and viewsheds
- Retention of local jobs and agricultural revenue
- Retention of entrepreneurial opportunities
- Avoidance of spending on municipal services for dispersed development
- Access to affordable nutritious food
- Ag practices that reduce negative public health impacts
- Outdoor access



Little Bear Creek Ranch Project Boundary Map Shasta County, California





1255 East Street, Suite 202 • Redding, CA 96001 • 530-262-6190 • Fax: 530-262-6189
E-mail: srta@srta.ca.gov • Website: www.srta.ca.gov

Sean Tiedgen, AICP, Executive Director

August 30, 2023

Mr. Abdelrahman Beshair
Branch Chief, Highway Safety Improvement Program
Office of Strategic Safety and Implementation
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

RE: Conceptual State Route (SR) 273 Safety Lighting Project

Dear Mr. Beshair:

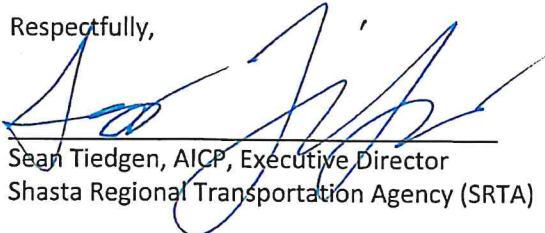
I am pleased to submit this letter in support of the California Department of Transportation's (Caltrans) proposed State Route (SR) 273 Safety Lighting project. The project proposes safety lighting in Shasta County in/near the City of Anderson into the City of Redding. The goal of the project is to improve the visibility of multimodal users using the facility, as there are services and destinations on both sides of the route.

State Route 273 is the alternative route to Interstate 5 (I-5) and is a designated bicycle and pedestrian route, as neither mode is permitted on I-5 through the proposed project limits. As a result, SR 273 frequently has bicyclists and pedestrians on the same facility used by vehicular modes traveling at high speeds. Between 2011 and 2020, nearly a third of all crash fatalities involving a person walking or biking in the entire Shasta Region occurred on SR 273.

The SR 273 Corridor has been a priority in the region for many years. The Shasta Regional Transportation Agency (SRTA) has been an active participant in the efforts to improve the operations and safety of the route through the SR 273 Transportation Concept Report, SR 273 Multimodal Corridor Engagement Plan, the current Envision 273 Comprehensive Multimodal Corridor Plan, and numerous capital projects to continually improve the operations and safety of the route for all modes of transportation.

Thank you for your time and consideration. Please contact me directly if you have any questions at (530) 262-6185 or stiedgen@srta.ca.gov.

Respectfully,



Sean Tiedgen, AICP, Executive Director
Shasta Regional Transportation Agency (SRTA)

From: [Sean Tiedgen](#)
To: Steve.Cliff@arb.ca.gov
Cc: [Mark Mezzano](#); Annmarie.Rodgers@arb.ca.gov; Chow.Yachun@ARB; [Ross, Bruce](#); Senator.Dahle@senate.ca.gov; assemblymember.dahle@assembly.ca.gov; [Amy Lindsey](#)
Subject: Comments Regarding California's Innovative Clean Transit Regulations
Date: Friday, September 8, 2023 8:48:20 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[SRTA BOD ICT Regs Comment Letter 08312023.pdf](#)

Good morning, Executive Officer Cliff:

On behalf of the Shasta Regional Transportation Agency (SRTA) Board of Directors, please accept the attached comment letter regarding ongoing concerns about implementing California's Innovative Clean Transit (ICT) Regulations.

SRTA serves as the metropolitan planning organization (MPO) and regional transportation planning agency (RTPA) for the Shasta County region. Additionally, SRTA currently contracts out specialized on-demand rural public transportation services that fall under the ICT regulations. While SRTA worked diligently to research and develop a zero-emission transition plan, the board of directors are concerned about the challenges the ICT regulations pose on rural public transportation services in transitioning to zero-emission fleets.

Thank you for taking the time to consider the comments in the letter. We appreciate the opportunity to work with your staff on efforts that are reasonable, cost-effective, and context appropriate. Please feel free to reach out to me or my staff if you have any questions.

Sincerely,

-Sean

Sean Tiedgen, AICP

Executive Director | Shasta Regional Transportation Agency (SRTA)
1255 East Street, Suite 202, Redding, CA 96001 | (530) 262-6185 | stiedgen@srta.ca.gov





1255 East Street, Suite 202 • Redding, CA 96001 • 530-262-6190 • Fax: 530-262-6189
E-mail: srta@srta.ca.gov • Website: www.srta.ca.gov

Sean Tiedgen, AICP, Executive Director

August 31, 2023

Honorable Steven S. Cliff, Ph.D., Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: California's Innovative Clean Transit (ICT) Regulations

Dear Executive Officer Steven Cliff, Ph.D.:

The Shasta Regional Transportation Agency (SRTA) serves as the metropolitan planning organization (MPO) and regional transportation planning agency (RTPA) for the Shasta County region. Additionally, SRTA currently contracts out specialized on-demand public transportation services that fall under California's Innovative Clean Transit (ICT) Regulations, which require small transit agencies to transition to zero-emission fleets by 2040. Recently, we, the SRTA Board of Directors, approved SRTA's first zero-emission rollout plan for these transportation services and received notice on August 4, 2023, that the plan was approved.

We appreciate that the California Air Resources Board (CARB) confirmed our plan meets the necessary requirements. However, we, the SRTA Board of Directors, write to express the following concerns we have on California's Innovative Clean Transit (ICT) Regulations and the challenges it poses on transitioning rural public transportation services to zero-emission fleets:

- **The technology has not caught up with operational needs** – Our rural public transit services, which connect people to our region's urban core, cover nearly 300 square miles over varying terrain. Our rural routes average 140-180 daily miles, which either exceeds or is at the described limits of many of the currently available zero-emission vehicles. For example, our plan shows only 30% of current daily rural trip requests could be accommodated, assuming a zero-emission vehicle has a 140-mile range and 10% battery reserve to return to a maintenance facility or charging station to re-charge. That leaves 70% of rider trip needs unable to be provided for without swapping vehicles or extended charging (if available). This would heavily impact service operations, increasing both capital and operating costs, potentially require more land for additional vehicles, or would mean fewer residents are served.

Due to technology challenges, the state should consider providing more flexibility in regions where very cold weather and mountainous terrain exist, such as the use of hybrid vehicles that can have a small generator to produce heat, which would extend the range of vehicles. Transit providers should not have to sacrifice how they operate and potentially provide less trips due to the limitations and costs of available zero-emission technologies. Rather, flexibility should be provided until zero-emission technologies, including vehicles, catch up with current and future community ride needs.

- **There are no appropriate fuel-cell vehicles available** – Fuel-cell buses have the potential to be a better replacement for existing gas/diesel vehicles for rural services when it comes to mileage, our varying terrain, and fluctuations in hot and cold weather (many times at or below freezing in winter months). Because of the areas served, smaller vehicles (e.g., 8-20 passenger capacity) are necessary to reach rural communities and to travel on these roads. While several large fuel-cell transit vehicles exist, there are no smaller fuel-cell buses available for purchase. Additionally, there appears to be limited interest by manufacturers to bring these vehicles to market any time soon.

- **There is a lack of workforce training for rural areas** – Rural areas continually struggle to retain employees in the public transit sector. Even more challenging is accessing the necessary training needed to operate or maintain vehicles. Often, rural agencies may need to send employees 100-200+ miles away to receive appropriate training, which adds to agency costs. Commonly, rural operators rely on small private businesses to help maintain existing vehicles because there is a lack of appropriately trained individuals for an agency to hire and retain maintenance staff. SRTA's rural operator indicated that initial communications with businesses that help maintain their vehicles lack the resources to invest in zero-emission vehicle training, or very few are interested at all, due to the small number of vehicles available currently. We need training programs across California, not just in urban areas, to train existing and recruit new staff. Apprenticeship programs through community colleges could help address this need.
- **It will be expensive and rural area funding resources are limited** – Rural transit providers have limited resources available for providing existing services in their large service areas today. Adding on the costs to plan for and implement zero-emission technologies only makes this worse. Battery electric vehicle costs are estimated to still be 1.5x the existing cost of similarly sized gas/diesel vehicles and many are not a 1:1 replacement; meaning more vehicles would be needed to meet existing rider needs, adding yet more costs. Since fuel-cell vehicles in the smaller bus categories (Class 3, 4, and 5 vehicles) are not available, we can only assume existing trends for larger buses, which is twice the cost, or greater. While various vehicle subsidies do exist, those subsidies are still for vehicles that fit a more urban environment, not rural regions.
- **Infrastructure costs are challenging, and supply is a concern** – Rural fueling/charging costs are highly variable and a challenge to predict. For example, hydrogen fuel for urban transit agencies is typically negotiated and subsidized (average \$9-\$10.50 per kg); which is significantly more than the equivalent cost of current gas/diesel prices. Additionally, local jurisdictions indicate future electricity prices may be 2-3x as much several years from now. Secondly, rural areas in the North State lack access to nearby hydrogen fuels, with the closest fuel being available 200+ miles away. This distance negates any benefits hydrogen would otherwise provide and adds costs. Thirdly, the flexibility to produce hydrogen is of concern. While "green" hydrogen from 100% renewable resources is ideal, it's typically twice as much as "blue" or "grey" produced hydrogen options and in much less supply. We need a market that is flexible. All of these factors will impact fuel pricing. While there are federal and state stated goals to reduce hydrogen fuel to comparable gas/diesel prices over the next ten years, it's difficult to reasonably assume that will happen.

SRTA's agency mission "is to maximize state, federal, and other revenues for cost-effective transportation investment strategies that connect communities, people, and goods." These revenues are our tax dollars. When it comes to zero-emission transportation for rural public transit, we're concerned that the transition will not be cost effective and may limit our operator's ability to meet the needs of those who rely on rural transportation services. SRTA is willing to work with the state and regional partners on efforts that are reasonable, cost-effective, and context appropriate. However, much work and state support are needed in this area.

Thank you for your time and consideration. If you have any questions, please feel free to reach out to SRTA's Executive Director, Sean Tiedgen, by email stiedgen@srtaca.gov or by phone, (530) 262-6190.

Respectfully,



Mark Mezzano, Chair

Shasta Regional Transportation Agency (SRTA)

Cc: Annmarie Rodgers, Branch Chief, Compliance Assistance and Outreach Branch
 Yachun Chow, Ph.D., Manager, Zero Emission Truck and Bus Section
 Senator Brian Dahle, California Senate District 1
 Assemblywoman Megan Dahle, California Assembly District 1



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Sean Tiedgen, AICP, Executive Director

September 12, 2023

Mr. Kien Le, Office Chief
Department of Transportation
Division of Financial Programming, MS 82
P.O. Box 942874
Sacramento, CA 94274-0001

Subject: Formal Amendment No. 5 to the Shasta 2023 Federal Transportation
Improvement Program (FTIP)

Dear Mr. Le:

With the delegation authority provided to me by the Shasta Regional Transportation Agency (SRTA) Board of Directors per attached SRTA Resolution #13-14, dated December 10, 2013, I hereby approve Formal Amendment No. 5 to the Shasta 2023 Federal Transportation Improvement Program (FTIP) for forwarding to California Department of Transportation (Caltrans) for review and recommendation of approval to the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA).

The amendment is consistent with metropolitan transportation planning regulations per Title 23 Code of Federal Regulations Part 450. As amended, the 2023 FTIP is financially constrained, and the attached financial summary confirms that funding is available. Additionally, the amendment is consistent with the 2018 Regional Transportation Plan. Shasta County is in conformance with federal air quality standards.

The amendment notification process complied with SRTA's adopted 2022 Public Participation and Title VI Plan. The public and interagency review period ran from August 25, 2023 through September 8, 2023, meeting the requisite 14-day review period.

This amendment includes the following programming changes listed below.

- **Grouped Projects for Railroad/Highway Crossing (CTIPS ID No. 211-0000-0121)** – This amendment adds this group project listing (for Section 130 railroad/highway grade crossings) that was last in the 2019 FTIP. This amendment programs \$1,596,000 of STP Railroad/Highway Crossing funding to FFY24 and \$40,000 of the same funding to FFY25, per the request of Caltrans' Railway-Highway Crossings (Section 130) Program.
- **Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing (and/or rehabilitation – Minor Program Projects) (CTIPS ID No. 211-0000-0108)** – This amendment adds this group project listing that was last in the 2021 FTIP. This amendment adds \$1,934,000 in SHOPP Advanced Construction to FY2023-24 for the

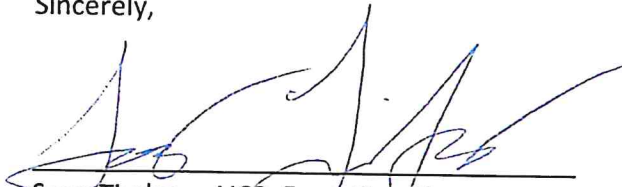
installation of a wash rack at the Hat Creek Maintenance Station. Amendment 5 also adds \$1,800,000 in SHOPP Advanced Construction to FY2023-24 for the construction of a Class I bicycle path in Old Shasta.

- **Grouped Projects for Operating Assistance to Transit Agencies (CTIPS ID No. 211-0000-0057)** – This amendment programs \$464,200 in FTA Section 5311 operating assistance funding for FY2025-26 and \$2 million in FTA Section 5307 operating assistance funding for the Redding Area Bus Authority (RABA) for each of the following programming years: FY2023-24, FY2024-25, and FY2025-26. The amendment also removes \$200,000 in Public Transportation Account funds and \$470,000 in Division of Rail and Mass Transit Assistance related to interregional transit operating assistance.
- **RABA Capital Vehicles (Fare Revenue) (CTIPS ID No. 211-0000-0059)** – This amendment increases FTA Section 5339(a) funding in FY23-24 to \$138,000 for the installation of new farebox equipment. The amendment also increases programmed FTA Section 5339(c) funds in FY2024-25 to \$1,586,100 to replace a 40' diesel bus w/37 seats (3 APA positions) and two gas-fueled cutaway vans (up to 16 seats) that meet minimal useful life requirements; and in FY2025-26 to \$2,074,000 to replace two more 40' diesel buses w/37 seats (2 APA positions) meeting useful life requirements. All these buses and vans will be replaced with new electric vehicles. \$29,025 in State of Good Repair (SGR) funds (Road Repair and Accountability Act of 2017), or SGR funds, and \$250,875 in Low Carbon Transit Operations Program (LCTOP) funding are being programmed in FY2024-25 as local match for the replacement electric vehicles. \$366,000 in LCTOP funds are also being programmed in FY2025-26 for replacement electric vehicles in that year. \$217,800 in SGR funding and \$377,100 in LCTOP funding are being programmed for information purposes only in FY2026-27, because this falls outside the current programming years. Finally, this amendment removes \$22,000 in Transportation Development Act funding from FY2023-24.
- **RABA Transit Capital (CTIPS ID No. 211-0000-0060)** - This amendment eliminates FTA Section 5307 funding for fiscal years FY2023-24 and FY2024-25 and increases Section 5307 funding in FY 2025-26 by \$1,059,000 for a maintenance facility expansion project. \$380,000 in Local Transportation Funds are also being programmed for FY2025-26 for this project while \$7,000 is being removed from FY2023-24 and \$240,000 from FY2022-23.

Using the statewide programming database CTIPS, Shasta 2023 FTIP Formal Amendment No. 5 is directly available for review and approval. An electronic copy will be transmitted by email to all regional partners and interested parties, including Caltrans, FTA, and FHWA. The amendment is posted to the SRTA website at <http://www.srta.ca.gov>.

For questions, please do not hesitate to contact Senior Transportation Planner, Keith Williams, at (530) 262-6192, or kwilliams@srta.ca.gov.

Sincerely,



Sean Tiedgen, AICP, Executive Director
Shasta Regional Transportation Agency (MPO)

ST/KW/al

Attachments: SRTA Resolution Number 13-14 – Delegation Authority for Formal FTIP
Amendments
Summary of Changes Table
Financial Summary Tables
Amended and Original Programming Pages for FTIP Projects
Back-Up Project Listings

C: Jean Mazur, FTA Region 9
Adekemi Ademuyewo, FHWA CA Division
SRTA Board of Directors
Rex Hervey, CT District 2
John Andoh, RABA
Bruce Roberts, CT RR-HWY Crossings (Section130) Program Manager
Todd Rogers, CT Highway-Rail Grade Crossings Safety Program