

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 10

P.O. BOX 2048, STOCKTON, CA 95201

(1976 E. DR. MARTIN LUTHER KING JR. BLVD. 95205)

PHONE (209) 948-7325

FAX (209) 948-7164

TTY 711

[www.dot.ca.gov](http://www.dot.ca.gov)*Making Conservation  
a California Way of Life.*

Governor's Office of Planning &amp; Research

**Jan 26 2021**

January 25, 2021

**STATE CLEARINGHOUSE**ACLTC  
2020 RTP IS/MND  
SCH# 2021010047

Ms. Debbie Burkett  
Executive Director  
Alpine County Local Transportation Commission  
50 Diamond Valley Road  
Markleeville, CA 96120

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Alpine Local Transportation Commission (ACLTC) 2020 Regional Transportation Plan (RTP) update and Initial Study/Mitigated Negative Declaration (IS-MND). The IS-MND assesses and discloses the RTP and specifies mitigation measures for the potential impacts of implementing the RTP.

ACLTC is commended for developing a 2020 Regional Transportation Plan Update that is clear, well supported with a documented public involvement process, and rich with graphics and illustrations. Caltrans notes an improvement in the detail of the RTP Update where clear goals with achievable objectives and policy strategies can be more easily understood throughout the plan.

The in-depth IS-MND supported by relevant information and statistics will benefit the ACLTC and many other agencies, stakeholders and the general public when reviewing potential impacts from transportation projects.

We would like to offer the comments below to assist in the development of the plan:

**General Comments:**

- We would like to commend ACLTC on the format used for the RTP. It is easy to read and digest the information on the vision for Alpine County.
- ACLTC should provide more clarification of both short-term and long-term strategies/actions.
- In addressing current and future transportation demands, ACLTC should provide for the development of an integrated multimodal transportation system (including accessible pedestrian walkways and bicycle

transportation facilities) to facilitate the safe and efficient movement of people and goods.

The RTP contains multiple blank pages with an abundance of white space mixed into multiple pages.

- Caltrans requests the following blank pages be removed or replaced with the data associated with that section from the plan: VI, 6, 34, Attachment A-Stakeholder List, Attachment B-Outreach Materials, Attachment C-Coordination with the State Wildlife Action Plan, Attachment D-Native American Tribal Consultation and Coordination, and Attachment E-Project Lists.
- Please consider resizing Table 4.2 to fill up the page or be moved to another page to avoid the large empty space on the page.
- Caltrans suggests reorganizing and resizing some of the RTP figures, tables and charts to balance the overall look of the plan.
- In the Public Engagement section of the RTP, Caltrans suggests removing duplicate images. This will help limit repetitive images and reduce overall page count.

Caltrans notes the Corona Virus-2019 (COVID-19) was only mentioned once within the RTP. This could be an important oversight not to include more discussion as COVID-19 had a massive impact within the transportation sector in 2020 and in public participation.

Caltrans acknowledges Alpine County is coordinating with the 2040 California Transportation Plans (CTP) goals, policies, and objectives. The CTP goals and recommendations can help support the objectives of the Alpine RTP and provide additional statewide context.

- Please provide more specific detail about how the RTP will align with the CTP goals and recommendations.

## **Specific Comments:**

### **1.0 Introduction**

The last sentence in paragraph 2 refers to 2017 RTP Guidebook; Please revise to 2017 RTP Guidelines, if referring to the 2017 RTP Guidelines. (p. 1)

### **1.4.1 Inter-Agency Coordination**

- There are two (2) 1.4.1 Headings (p. 3)

#### **1.4.1 Coordination with Native American Tribal Governments**

- We would like to commend ACLTC on the documented coordination efforts with the Washoe Tribe of Nevada and California. These methods were identified in Appendix D.
- Were there any specific comments shared by the Tribe either on specific projects or did they have any specific comments related to the development of the RTP? We would suggest including this information within the RTP.

#### **1.4.3 Public Participation**

- It is unclear if ACLTC conducted a periodic review of the effectiveness of the procedures and strategies contained within the Outreach Strategy to ensure a full and open public participation process.

Caltrans suggests referring to the information detailed in the 2018 Alpine County Active Participation Plan (ATP). The ATP describes needed improvements on bicycle and pedestrian facilities throughout the county and includes stakeholder feedback in an 18-question questionnaire. The feedback in the ATP public outreach process provides relative information which should be referenced and incorporated into the RTP.

There are multiple goals within the RTP which seem to focus around improving equity. However, the term “equity” is only mentioned once in policy 7.2, Goal #7 to promote alternative transportation. “Promote equity, cost effectiveness, and modal balance in planning, and allocate funds to regionally significant roadway and trail projects.”

- Caltrans suggests including greater description for how the RTP goals will have a beneficial influence on equity within Alpine County.

#### **1.4.4 Coordination with the California State Wildlife Action Plan**

Please change the last sentence to reflect the appropriate region. “For a complete list of species of special concern, key stressors and actions suggested for wildlife management in the North Coast and Klamath region, see Attachment “C.” (p. 5)

## **2.9 Active Transportation**

Caltrans recommends the RTP provide more local area maps to illustrate the current bicycle and pedestrian opportunities within Alpine County and to identify network gaps in the comfort and connectivity. Other identified needs worth mentioning in the RTP may be found in the District 10 Caltrans Active Transportation Plan (ATP).

## **2.11 Goods and Freight Movement**

State Route (SR) 89 highlights the span of the corridor and briefly mentions the closures due to weather on certain segments, but it rarely closes over Luther Pass. Luther Pass at the junction SR 88/El Dorado County Line has the heaviest truck volumes, according to the recent Annual Average Daily Traffic (AADT) numbers. (p. 32)

- Please include a statement further describing Luther Pass closures.
- Caltrans recommends answering the question if closures along certain segments of SR 89 are avoidable and/or are they due to any other reasons besides weather?
- With the new proposed scenic byway (SR 4), please describe how incremental weather and potential road closures will impact future operations for goods movement? (p. 29)
- The Alpine County Draft RTP includes performance measures for pavement conditions and suggest monitoring them every two years. Please expand on the details for this section.
- Please consider expanding the information for freight movement, the collection of data for Weigh-In-Motion (WIM) and pavement strength to accommodate trucking over the duration of anticipated useful life of the pavement improvements. The California Freight Mobility Plan (CFMP) 2020 on page 79 (Chapter 3.A. Existing Freight System Assets) could be used as a reference. (p. 62)

There are missing elements mentioned in the long-range planning efforts for Alpine County, such as road conditions as they relate to goods movement and any planned improvements, such as truck parking facilities, areas of natural resource development, and how the plan (though not statutorily required) will address the road to sustainable freight transition, such as Zero Emissions Vehicle (ZEV) infrastructure readiness, electric vehicle plug-in stations, and other planned improvements that would benefit economic outcomes while reducing the impacts of climate change on the region per Appendix H of the 2017 RTP Guidelines, and per AB 1482, SB 246, SB 375, AB 32, SB 32, and Executive Orders N-

19-19 and N-79-20. Please consider including information for these elements. (p. 100)

The key pressures on conservation targets for all freight generators within the region include mining and quarrying facilities, livestock ranching, farming, and logging.

- Caltrans recommends inclusion into the RTP of a separate regional agricultural study and other planned studies that could assist in the public decision-making process. These studies for improving regional goods resiliency, preservation, and conservation on key natural resources would provide an explanation for how the region plans to address and manage future growth, which would also be outlined in the Alpine County Overall Work Program (OWP).
- Please consider the addition of a study in the RTP to describe how the impacts of tourism and recreation affect freight demand for further regional economic/environmental studies within the region. (p. 120)

The constrained and unconstrained list (Table 4.1) does not include any rehabilitation projects or major development improvement projects for the regional airport in respect to goods movement.

- Caltrans recommends the RTP include a study of air cargo operations and facilities that would accommodate the flow of goods on an interregional level. (p. 143)

Caltrans appreciates the addition of truck climbing lanes. This would improve Level of Service (LOS) and increase safety as would the left turn pockets at the intersection of SR 88 and Diamond Valley Road.

Caltrans notes there appears to be far fewer maps available to depict the freight facilities in the region, aside from the key highways significant to goods movement.

- Caltrans recommends including additional feature layers for available pipeline networks, raw materials sites, and other important examples providing information as to the primary contributors to the freight supply network.

### **3.0 Policy Element**

- We would like to commend ACLTC on the layout of the Policy Element. The Issues, Goals, Objectives and Policies are very easy to follow.

- ACLTC should identify the specific metrics that were used to prioritize the identified projects in the Action Element of the RTP.
- Per the RTP guidelines (Government Code 65080(b)), the goals and objectives should be identified as short/long-term goals. As such, ACLTC should identify if the objectives/strategies in the Policy Element are short/long-term strategies.

### **3.1 Transportation Issues**

Senate Bill 391 (SB 391, 2009) required the California Department of Transportation to prepare the California Transportation Plan (CTP), the State's long-range transportation plan by December 2015, to reduce Green House Gas (GHG) emissions and Vehicle Miles Traveled (VMT).

The long-range Plan states this system must reduce GHG emissions to 1990 levels from current levels by 2020, and 80 percent below the 1990 levels by 2050 as described by AB 32 and Executive Order S-03-05. The CTP 2040 demonstrated how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. It is important to align and implement the goals, policies, and strategies laid out in the CTP 2040, and to continue coordination and collaboration with Caltrans during the development of the CTP 2050.

- The Alpine County RTP should align with the plan recommendations to help aid in the future implementation process of the CTP 2050.
- The CTP 2050 is scheduled to be released in early 2021. The Alpine County RTP should align with the plan recommendations to help aid in the future implementation process of the CTP 2050.

### **3.5 Local Roads**

Caltrans suggests ACLTC should consider including additional maps to show the needs and current conditions of their local streets and roads.

### **4.4 Transportation Safety**

Please note there are two "as well as" in the last paragraph of this section.

### **4.5 Transportation Security/Emergency Preparedness**

This section addresses the issues associated with large-scale evacuation due to a natural disaster or terrorist attack. The RTP describes forced evacuation due to wildfire, flood or landslide is the most likely emergency scenario as Alpine County

is approximately 740 square miles of forested landscape with small pockets of population centers.

- Caltrans appreciates the inclusion in the RTP update that identifying evacuation routes and other methods of evacuation is pertinent to the scope of the RTP.
- Caltrans appreciates the statement the implementation of Intelligent Transportation System (ITS) projects, such as Road Weather and Information Systems (RWIS), Changeable Message Signs (CMS), and Closed-Circuit Television (CCT) could assist with maintaining a steady flow of traffic on the State highways while keeping evacuees informed. (p. 51)
- Caltrans appreciates the acknowledgement included in the RTP that there is currently not a formal countywide evacuation plan for the Alpine County region. We invite ACLTC to consider an evacuation plan be developed.

#### **4.6 Goods Movement**

The RTP states freight trucking generates a significant proportion of traffic volumes on the state highway system in the County. The predominant generator of freight movements is through traffic transporting agricultural products between Nevada and California's central valley, particularly on the SR 88 and 89 corridors within the Alpine County transportation system. (p. 51)

Caltrans requests more emphasis be placed on the role goods movement has on the region.

- Please provide more detail for the modal categories that make up the goods movement system. Examples would include the available freight/rail network, any cargo operations at airports, and the distribution of hazardous materials and flammable energy sources traversing through pipeline and/or rail networks in the region. (p. 51)

#### **4.11.1 Roadway Projects**

Caltrans acknowledges the list of The State Highway Operation and Protection Program (SHOPP) Projects SHOPP in Table 4.1. (pp. 53-54)

- Please provide a brief description defining SHOPP projects for the general public's understanding when reading the RTP and Table 4.1.
- Please remove project #2, "Near Kirkwood, on Route 88 (EA 1G020). This project is the same project as the one shown on page 53.
- Please consider adding any 2022 SHOPP projects.

- Please add the following project information to Table 4.1 on page 54:  
Project Source: 2020 SHOPP  
Funding Source: 2020 SHOPP  
Route/PM: Various Locations on SR 4, 88, and 89 in Alpine County (EA 1F720)  
Description: Rehabilitate drainage culverts at 36 locations within the project limits.  
Total Cost: \$8,251,000  
Const. Year: 2025

## **5.0 Financial Element**

- If applicable, ACLTC must clearly identify any regionally significant projects in their project list or include a statement that there are no regionally significant projects during this planning period.
- Please clarify if the cost estimates for implementing the projects identified in the RTP reflect “year of expenditure dollars” to reflect inflation rates.

Caltrans acknowledges in the RTP, the County will focus on Active Transportation Program (ATP) funding: “In order to complete the short/long-term bicycle and pedestrian projects the County will need an estimated \$10.2 million over the course of the next 20 years . Funding will come primarily from the ATP which is a highly competitive grant program which supports multimodal active transportation.” (p. 66)

### **5.3.4 Transit**

Caltrans appreciates the RTP’s acknowledgement of the Transit Development Act (TDA) which provides Local Transportation Funds (LTF) and State Transit Assistance (STA) for supporting public transportation regarding the future capital improvements in Alpine County.

- Please revise the third sentence in the paragraph where an additional “the” exists before the word “both”.

## **Attachment B**

- Under Next Steps, please verify the dates listed in this attachment for accuracy.

## **Initial Study Comments**

Caltrans notes the Air Quality section combines brief information on conformity with GHG and VMT information.

Ms. Debbie Burkett  
January 25, 2021  
Page 9

- Caltrans recommends relocating the GHG and VMT information to their respective sections in the Transportation and GHG analysis of the RTP.
- ACLTC should complete the information for the California Environmental Quality Act (CEQA) analysis regarding air quality issues to provide supporting data for Less than Significant (LTS) determination (conflict with Air Quality Plan, air quality standards, criteria pollutants, sensitive receptors, and objectionable odors).

Conclusions of Less than significant impacts are not supported with text and information in the proposed IS/ND with the following statement “The RTP is a programmatic document and the proposed projects will be reviewed on a project-by-project basis, therefore there is no potential for significant impact.”

- Caltrans acknowledges that this is a programmatic document. The potential impacts of the entirety should be considered with further impacts and details to be refined in each project specific environmental document completed for those projects.
- The statements that VMT increases are expected to remain fairly low from residents and population reduction only accounts for a portion of potential GHG emissions. While increases in VMT are relatively low, they appear to still be increasing in the Alpine County region and should be accounted for.
- Emissions related to construction and maintenance activities are not addressed. Per CEQA, all aspects of the proposed action should be considered and GHG reduction measures for those activities should be included.

In addition, Caltrans would like to remind ACLTC to submit a hardcopy and an electronic version such as a Compact Disk (CD) or a Universal Serial Bus (USB) thumb drive of the final RTP and IS-MND after it has been approved by the Commission.

If you have any questions or would like to discuss these comments, please contact Lloyd Clark at (209) 941-1982 (Email: Lloyd.Clark@dot.ca.gov) or me at (209) 948-7325 (Email: gregoria.ponce@dot.ca.gov).

Sincerely,

*Gregoria Ponce*

Gregoria Ponce, Chief  
Office of Rural Planning

Ms. Debbie Burkett  
January 25, 2021  
Page 10

- c. Gilbert Valencia, Transportation Planner, Office of Regional Planning  
Erin Thompson, Chief, Office of Regional Planning  
OPR - State Clearinghouse  
California Transportation Commission  
IGR File

Ms. Debbie Burkett  
January 25, 2021  
Page 11

bcc. Environmental – Dominic Vitali, Abdul Choudhry  
Traffic Operations – Sang Hyunh, Transportation Engineer  
Project Initiation Travel Forecasting - Eric Chin  
Strategic Freight Planning - Jeff Morneau, Eva Slover  
System Planning and Goods Movement - Lynn R. O'Connor  
Office of Rural Planning - Gregoria Ponce, Chief, Rural Planning  
Advanced Planning - Lynn O'Connor, Sr Transportation Planner  
Traffic Safety - Larry Hernandez, HQ, ADA Engineer  
Multi-Modal System Planning - Scott Sauer, Supervising Trans Planner  
Office of Aviation Planning - Mathew Friedman, Chief, Aeronautics  
Office of Smart Mobility/Climate - Alec Kimmel, Senior Trans Planner  
Office of State Planning - Gabriel Corley, Supervising Trans Planner  
Division of Rail and Mass Transit - Andy Cook, Supervising Trans Planner  
-Josh Pulverman, Supervising Trans Planner  
Office of Environmental Management - Brenda Powell-Jones, Sr  
Environmental Planner