

California Department of Transportation

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November 22, 2024

Ms. Darin Grossi
Executive Director Tuolumne County
Transportation Commission
2 S Green Street
Sonora, CA 95370

**Tuolumne Regional
Transportation Plan
and EIR
SCH 2023060211**

Dear Ms. Grossi,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Tuolumne County Transportation Commission (TCTC) Draft Regional Transportation Plan (RTP) 2024 Update and Environmental Impact Report

Caltrans would like to commend TCTC for providing an updated RTP that is clear, well supported with a documented public participation process, rich with graphics, illustrations, and a detailed discussion of the region.

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

RTP

General Comments

- We commend TCTC for providing a thorough discussion of the transportation issues associated with increased wildfires due to climate change.
- Caltrans would also like to commend TCTC for providing the focus on Active Transportation and Mass Transit solutions and projects for future mobility needs and providing appropriate reference locations for the RTP Checklist contents.
- Caltrans District 10 endorses Safe Routes to Schools programs and is ready to be a partner to promote strategies for safer, less stressful streets for walking and bicycling in locations where schools are located on the State Highway System (SHS).

General Comments (continued)

- Caltrans District 10 endorses coordination with Tuolumne County in an ongoing effort to enhance bicycle and pedestrian facilities on the State Highway System (SHS). To ensure separation and protection for bicyclists and pedestrians from motor vehicle traffic on state highways in built environments, we endorse the installation of connected sidewalks, landscape buffered from vehicle lanes where possible, as well as buffered Class II, Class IV, and Class I bicycle/shared use facilities where feasible.
- Active Transportation endorses the widening of paved shoulders on rural highways to standard width where feasible. Doing this will assist in emergency and natural disaster evacuation efforts, reduce vehicle run-off-the-road risk on segments that have little to no paved shoulder, provide space for slower vehicles to pull over to allow faster vehicles to pass while lowering the risk of a head-on crash when passing in the opposite lane, and reduce the level of traffic stress (LTS) by providing more space and separation for bicyclists using the state highway system.
- The economic statistics appear to be dated. For instance, unemployment rate in California is not 8.3% -- it's 5.3%, and the median home values are also much higher now than stated in the RTP.
- RTP would also benefit from including Caltrans Systems Investment Strategy performance measures as it identifies strategies for congestion issues.
- The RTP has listed the economic development as one of their Regional Visions (Page 6) and Railroad Elements (Page 59) but didn't mention any strategies or performance measures for it (Page 19). It would be helpful to mention the performance measures to achieve the economic development strategies.

Introduction

- Page 19, Table 2.1 - Adding more specific data related to accessibility in the performance measures (e.g., residents near transit, PCI data, pedestrian/bicycle infrastructure mileage).
- Page 20, Table 2.1 - Include more explicit strategies in the performance measures for encouraging the public and agency involvement.
- Page 24, Table 2.6 - 0 misplaced on the right of % sign in row reflecting \$150,000 to \$199,999.
- Page 35 - Figure 2.10 and Figure 2.11 labels are swapped.
- Page 38, 1st paragraph, last sentence - Includes the word 'shoulder'. Is this intended? Please consider 'should'.
- Page 42, 1st paragraph, 4th sentence – Please consider “Tuolumne County may need to "reconsider" its growth projections as these "fire" hazard severity zones...”
- Page 52 - Recommend listing the participants of the professional development workgroup in addition to showing the logos in Figure 2.20. Also, a note of what constituency the organization represents would help to tie it back to 23 CFR 450.210(a)(1)(ix).
- Page 54, 1st paragraph, 1st sentence – Reflects 'Douglas County'. Please edit.

Regional Transportation

- Page 62 - List the existing challenges in every corridor, this can help highlighting the priorities.

Policy Elements and Land Use

- Page 80, last paragraph, 2nd sentence – Please consider "...County's 'communities' benefit"...
- Page 83, Transit box (RSS) – Please consider '...when "financially" feasible...'

Local Streets and Roads and State Highways

- Page 110, last paragraph - Last line includes the word 'shoulder'. Is this intended? Please consider 'should.'
- Page 111, 2nd paragraph, 1st sentence - Please consider 'The PCI is a numerical pavement condition "rating, ranging from 0 to 100."
- Page 117 - Expand on prioritizing the complete street strategies like addressing the full integration of safety, multimodal improvements, and complete street principles across all transportation modes.
- Page 131, Figure 5.5 - label misspelled "Stanislaus".
- Page 131 - 3rd to last sentence of the last paragraph should be written as "functionally obsolete."

Non-Motorized Transportation

- Page 134 - "A key component to non-motorized transportation is filling the missing gaps in non-motorized infrastructure," it would help to identify those missing gaps. Also, more explicit descriptions of how these Non and motorized modes interact could strengthen the plan.
- Page 135, 2nd to last paragraph, - ...the 2024 RTP strives to improve access and "expand" the active transportation network. Please revise.

Public Transportation

- Page 152, 1st paragraph - Tuolumne TRIP (Transportation Reimbursement and information Program). Please capitalize the I in TRIP.
- Page 157, Figure 7.11, pie chart - Symbols covering words.

Railroad

- Page 162, 1st paragraph, Railtown 1897 State Historic Park – Revise to (see Figure "8.3")

Aviation

- Page 168, 1st and 2nd paragraphs - It seems there is some missing content in the paragraph break. Also, the paragraph break doesn't end with the end of a sentence or start the next paragraph at the beginning of a sentence.

Emerging Transportation Technologies

- Page 184 – “Operating 21 total vehicles, Tuolumne County Transit is classified as a small agency, with a rollout plan due by 2023.” Date has passed so tense should be updated.
- Page 184, Table 10.5 – Consider including the month and year which the fleet info is from. I.e., As of March 2024
- Page 185 - “Yosemite Area Regional Transportation System is classified as a small transit organization, with a rollout plan due by 2023.” Date has passed so tense should be updated.

Financial Plan

- Page 191 – “Local Transportation Funds (LTF) are governed by the Transportation Development Act (TDA). The amount is based on sales tax collected within Tuolumne County. The TDA is a state funding source providing funding to transit through Local Transportation Funds (LTF) and State Transit Assistance Funds (STAF). TCTC dedicates about 65% of LTF to public transit. STAF may only be allocated for public transit purposes.”

Suggest revising paragraph to read as:

The Transportation Development Act (TDA) is a state funding source providing funding to transit through Local Transportation Funds (LTF) and State Transit Assistance Funds (STAF). LTF is derived from a quarter cent of the state sales tax collected within Tuolumne County. TCTC dedicates about 65% of LTF to public transit. STAF is generated from a statewide sales tax on motor vehicle (diesel) fuel and may only be allocated for public transit purposes.

- Page 191, 2nd paragraph, 3rd sentence - "Funding for bicycle and pedestrian projects primarily comes from grant programs, making it difficult to constrain many active transportation projects due to uncertain funding." Is the use of 'constrain' intended? Or is this sentence referring to 'construct'?
- Page 191, 1st paragraph, 3rd full sentence - "...to simply project delivery." Use of the word "simply", is that intended?
- Page 192 – LCTOP is not a new program (2014). Please consider revise.
- Page 194 - The checklist points to page 195 but the last page of the document is page 194. Also, there appears to be no notation about using year of expenditure dollars to reflect inflation rates for projects in the future. Please ensure that the table states that the cost estimates are using year of expenditure dollars to reflect inflation rates.

EIR

General Comments

- We are concerned with the gap between the projected population growth and the department of finance projection of a population decline over the next 20 years.

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Executive Summary

- Page ES-2, 1st paragraph – Please revise spelling to read as follows: “State Route (SR) 108 “traverses” the western...”
- Page ES-13 matrix - Should this read "Class IV Significant and Unavoidable?"
- Page ES-3 - The executive summary outlines proposed regional alternatives B and C for which analysis of potential impacts do not appear to be carried forward in resource evaluations. Evaluation of key impacts related to GHG, air quality and VMT would benefit greatly from evaluation of these alternatives and their ability to meet the stated objectives.
- Page ES-3 - Alternative C appears to propose separating climate adaptation efforts in to stand alone projects, however it is suggested that there is potential for greater efficiency in incorporating these efforts and considerations in to proposed projects wherever possible. Consideration of the overall cost vs benefits of doing so is highly encouraged.

Project Descriptions

- Page 2-22, 2nd paragraph - Please correct spelling to read as follows: "Tuolumne County encompasses 2,274 total square miles, or 1,455,360 “acres” ..."

Environmental Impact Analysis

- Page 4-1 - Caltrans appreciates the efforts of Tuolumne County to identify and implement active transportation projects such as new shared-use paths, sidewalks, walkways, bike lanes, and complete streets. The County is encouraged to continue prioritizing the implementation of such projects, particularly those in the 2050 Unconstrained Scenario (Tier 2) which provide clear benefits in terms of safety, operational efficiency, and VMT reduction. For the capacity-increasing projects included in the RTP, the project environmental analyses would need to show that they do not significantly undermine the state's GHG reduction goals.
- Page 4-3, 3rd Paragraph - CARB recently published the 2022 GHG inventory for the state, which shows a reduction in GHG emissions of 10.2 MMTCO₂e compared to 2021.
- Page 4-3, Table 4.3-1 - The reference list does not include CARB 2023b.
- Page 4-16 - The reference list does not include CARB 2022a and CARB 2022b.
- Page 4-38 - Section 4.3.3.2 describes construction related GHG emissions as short-term emissions. Given the global warming potential of the 6 key greenhouse gases (carbon dioxide, methane, nitrous oxide, fluorinated gases), the impacts are long term. Once emitted GHG emissions remain in the atmosphere for the timelines associated with their global warming potential. Suggest rephrasing “short-term emissions” to construction emissions throughout this section.

The evaluation may be revised to indicated that the construction activities are short term in nature, but the GHG emissions are permanent and will contribute to the overall cumulative impact. This is not a speculative impact, suggest revision to the text to indicate the challenge of calculating the construction impacts at the

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RTP phase, but instead enhance the potential measures that project proponents can include to reduce those impacts.

- Page 4-39 - Mitigation Measure GHG-1 is related to nitrogen oxide emissions which are an indirect pollutant and measure does not address the primary 6 GHG, therefore recommend expanding the potential measures to capture a broader potential impact. Consider including the following measures similar to those included in the San Joaquin Council of Governments (SJCOG) RTP provided below.

From SJCOG RTP

Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to:

- Use energy and fuel-efficient vehicles and equipment.
 - Deployment of zero- and/or near zero emission technologies.
 - Use lighting systems that are energy efficient, such as LED technology

 - Use the minimum feasible amount of GHG-emitting construction materials that is feasible.
 - Use cement blended with the maximum feasible amount of flash or other materials that
 - Reduce GHG emissions from cement production.
 - Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
 - Incorporate design measures to reduce energy consumption and increase use of renewable energy.
 - Incorporate design measures to reduce water consumption.
 - Use lighter-colored pavement where feasible.
 - Recycle construction debris to maximum extent feasible.
 - Plant shade trees in or near construction projects where feasible; and
 - Solicit bids that include concepts listed above.
 - Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.
 - Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network
- Page 4-40, Table 4.3-2 - Should include supporting information as to how reductions were calculated.
 - Page 4-44, Table 4.3-3 - Should include information and comparison of alternatives B and C mentioned in Chapter 6. Information should be provided on the benefits

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of implementing alternative C for GHG and VMT reduction.

- Page 4-47 - "...adopted of..."; please consider "...adoption of..."
- Page 4-56 - "[g]enerally, VMT..."; please consider "generally, VMT..."

Other Appendices

- Appendix D Page 7, Social Services Transportation Advisory Committee list - "Social service provider for persons of limited means" is duplicated.

If you have any questions or concerns, please contact Shiferaw Jemberie (209) 986-9635 (email: Shiferaw.jemberie@dot.ca.gov) or me at (209)948-7325 (email: Anupam.mishra@dot.ca.gov).

Sincerely,

Anupam Mishra

Anupam "Chris" Mishra, Chief
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Aeronautics – Vincent Ray
DOTP Freight – Kalin Pacheco
Other – Shannon Simonds (no comments)