California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 948-7325 | FAX (209) 948-7164 TTY 711
www.dot.ca.gov

November 25, 2025

Ms. Melissa Raggio
Executive Director
Calaveras Council of Governments
444 E. Saint Charles Street
San Andreas, CA 95249

Calaveras Council of Governments (CCOG) Regional Transportation Plan (RTP) 2025 and Initial Study Mitigated Negative Declaration (IS-MND)– SCH 2025091376
AMENDED LETTER

Dear Ms. Raggio,

Thank you for the opportunity to review and provide comments on the Calaveras County Council of Governments (CCOG) Regional Transportation Plan (RTP) 2025 Update and Initial Study (IS). The CCOG RTP 2025 update presents a 20-year vision for all types of transportation capital improvement projects in Calaveras County. The plan identifies transportation related issues, outlines goals, policies and objectives and includes a list of future transportation projects to address the issues.

The proposed project is the adoption and implementation of the 2025 Calaveras County RTP. The Calaveras Council of Governments (CCOG), which serves as the Regional Transportation Planning Agency (RTPA) for the County of Calaveras and the City of Angels, is required by law to adopt and submit an approved Regional Transportation Plan (RTP) to the California Transportation Commission (CTC) every five years. The RTP will serve as the guide to federal, state and local funding through 2045. The development of RTP is a cooperative effort between the CCOG, County, City of Angels, Caltrans, tribal governments, and residents of Calaveras County. Transportation improvements proposed at RTP cover all modes of travel reflecting a system planning approach within Calaveras County. Improvements are categorized as short-range (0-10 years) or long-range (11-20 years). The Regional Transportation Improvement Program (RTIP) comprises the first five years of RTP projects and is described later in the document. The RTP planning effort focuses on developing a balanced financially constrained transportation system that ensures projected revenues cover all transportation improvement costs over the life of the plan (2045).

Caltrans would like to commend CCOG 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:

SPECIFIC COMMENTS – INITIAL STUDY

Project Description

Aesthetics

Page 9, Rural Landscape - it states that "ranching and agriculture play only a small role in the modern Calaveras County economy, providing less than one percent of county jobs." However, on page 12, Background: "Agriculture and livestock production are major contributors to the county's economic base.

Responses To Checklist Questions

Page 31, Response 7, Less Than Significant Impact - This section states that the RTP improvements would improve the county's transportation network; however, it is unclear how this would be achieved, as there are no specific network-related goals.

Transportation

Page 42 – second paragraph under Background: the number of miles of county-maintained roadways is not 1,142.16 if the total number of miles of roadway is 1,143.38 and the mileage of State Routes (SR) is 102.23. It should be 1,041.15. The stated number only accounts for 1.22 miles of State Routes.

Wildlife

Page 47, Response to Checklist Questions - The Initial Study (IS) links RTP Goal 2 to the County's defense against wildfire risk. However, it is unclear how this goal (to promote walking, biking, and other modes of active travel in Calaveras County to improve mobility and quality of life for all residents and visitors) addresses the risks. For example, most people use autos because they must evacuate quickly. They do not have time to bike, walk, or wait for transit operators to send out buses. Furthermore, only Goal 6 addresses disaster emergency services, but it is specific to the Calaveras County Airport, not to highways or other modes of transportation.

GENERAL COMMENTS - REGIONAL TRANSPORTATION PLAN

- Caltrans commends CCOG in their broad and collaborative process of the RTP development that involves Native American Tribal Governments as well as Stakeholders from Government agencies, private business, advocacy groups, community - based organizations and the public. We acknowledge and support the coordination with Tribes and stakeholders to consider financial partnerships on projects and grants that serve Tribal lands and surrounding communities.
- Caltrans generally does not endorse Class III bike routes on the State Highway Systems (SHS), due to Annual Average Daily Traffic (AADT), truck AADT, and speed considerations. On state highways where bicycles are allowed, current understanding is that these highways are bicycle-accessible, or that shoulders are bicycle-accessible. However, accessibility does not equal having a designated Class III facility.
- Caltrans generally supports efforts in built environments to install high visibility crosswalks at intersections. However, proposals to install new high visibility crosswalks across a state highway will require Caltrans Traffic Operations and Safety study, review, and analysis before approval or agreement.

SPECIFIC COMMENTS - REGIONAL TRANSPORTATION PLAN

Chapter 1. Executive Summary and Introduction

- Page 5, consider adding the Trade Corridor Enhancement Program (TCEP), if it is a priority funding program the CCOG is interested in.
- Page 7, Sec. 1.3.3 Coordination with Other Plans and Studies - Consider including the California Freight Mobility Plan (CFMP) in this section.

Chapter 2. Existing Conditions

Setting

- Page 12, Sec. 2.1 - The current draft of this chapter includes inventories, maps, and raw statistics; however, its context does not effectively connect the data to relevant sections and to relate it to the Plan's goals and objectives. Consider incorporating data on employment, pavement conditions, housing, bridge status, traffic volume, and truck traffic.

Housing

- Page 21, Figure 2.3 - Interestingly, the household median income is high in the western and eastern portions of the state and low in the central regions. This map is referenced on pages 18 to 20 instead of 21. However, this section only references the MHI metric; it does not explain the disparity between the east and west, as well as the central regions, of the county. Consider adding a narrative that expands on the challenges and needs of these communities.

Streets and Roads

- Page 37, Sec. 2.8.6 VMT - Why have forest service roads seen such a significant VMT increase? Is it due to wildfires?
- Page 39, Sec. 2.8.7 Truck Traffic - What causes the increase (0 to 6.1%) in truck traffic at SR 12 and 26? Also, what is the driver of truck traffic on these highways? What industries and businesses do they serve? Is there a reference or information on the percentage of truck traffic that consists of 5-axle trucks?
- Page 41, Sec. 2.8.8 Safety - Is there a reference or information on crashes involving freight trucks? What are the issues that are causing these collisions?

Aviation

- Page 53, Sec. 2.11 - Does this airport support air cargo or emergency response? If so, what types of cargo? Cargo also includes medical supplies, transporting people to higher-level medical facilities, mail, and parcels.

Goods and Freight

- Page 55, Sec. 2.12 Goods and Freight Movement - Consider connecting those upgrades directly to truck accessibility. For example, upgrading older highways to STAA standards would allow industry-standard trucks, currently prohibited from accessing these highways, to conform to STAA standards. This would result in fewer freight trips, as one truck could haul the cargo where two would previously be required, reduce truck VMT, allow for quicker response times, and facilitate the quicker movement of emergency equipment.
- Page 55, Sec. 2.12.1 State Highway Truck Networks - Consider a Calaveras Truck Network map that is derived from the CA Truck Network.
- Page 55, Sec. 2.12.2 Goods Movement Issues in Calaveras County - Overall, it would be helpful to have more specific information and details about goods movement, such as which industries it serves, and which highways and local roads are the primary freight corridors.
- Page 56, Sec. 2.12.3 Truck Parking - Consider including existing Truck parking areas or gaps.

Interconnectivity Issues

- Page 57, 2.14.4 Goods Movement – Consider including specific impacts, such as reduced emergency response times (for both natural disasters and ambulance/police services) and evacuation times. If there are industry-standard truck restrictions (STAA gaps), does this result in goods needing to be transferred from the standardized truck to two smaller trucks to reach the final destination?
- Page 57, Sec. 2.14.3 Aviation – It should be noted that the Airport Land Use Compatibility Plan (ALUCP) for the one airport in Calaveras County was adopted in June of 2010. The California Airport Land Use Planning Handbook states that ALUCP should have a comprehensive review and update at least every five years.

- Caltrans recommends that regional planning agencies prepare, when appropriate, to address the following areas of future focus:
  - Wayside equipment for electrified aircraft, and electric aviation in general.
  - Sustainable Aviation Fuel (SAF), currently in the testing stages for commercial aircraft, but will eventually trickle down to general aviation.
  - Improved ground access for multimodal transportation alternatives.
  - Advanced Air Mobility (AAM) infrastructure and concurrent land use zoning considerations. In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when sitting future development, and preserve the viability of the aviation system as an economic engine for the region.

  In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when siting future development, and preserve the viability of the aviation system as an economic engine for the region.

Climate Vulnerability

- Page 58, Sec. 2.15 - Due to the Federal Executive Orders, consider modifying this section to address preparedness and resiliency. This section is directly tied to freight movement, as heavy equipment used for emergency responses is considered cargo. Emergency response vehicles are often similar in size to standard 5-axle trucks. Furthermore, during natural disasters and weather events, trucks are used to bring in food, water, building supplies, tents, etc.)
- Page 58, Sec. 2.15 - The inclusion of expanded electric vehicle charging infrastructure seems out of place in this section, as electricity will likely not be available during flooding, wildfire, and weather events.

Chapter 4. Action Element

Performance-Based Planning and Programming – Planning to Projects / Project Lists
Consider revising the goals and objectives utilizing the data and statistics from the Existing Conditions Chapter to identify needs (deficiency). Then use the Program-Level Performance Measures Section of the Action Element (page 84) to evaluate and analyze the projects to determine if, or how well they align with the Plan's goals and objectives (including performance measures and targets). Additionally, add a column to the project lists that specify which goals and objectives each project addresses.

This approach will help identify transportation deficiencies and develop, justify, and prioritize projects that are consistent with the plan's goals and objectives.

Regional Goals, Objectives, and Strategies

- Page 65, Goal 6: Addresses disaster and emergency services specific to the Calaveras County Airport. Responding to natural disasters and emergencies also involves maintaining highway and roadway infrastructure, as well as utilizing other transportation modes, such as fire trucks, medium- and heavy-duty trucks (for moving equipment, transporting medical supplies, food, etc.), and automobiles (for evacuation). As this is the only goal that addresses disaster emergency services, consider adding a nexus to highway and roadway infrastructure.

- From a freight perspective, it would be helpful to see goods movement highlighted more within the goals, as it would make it easier to develop rural freight highway project purpose and need statements and make those projects more competitive for discretionary grants or formula funding. It would be helpful to also elaborate on the connection between the transportation system and the state (taxes on tourists (hotels, fuel, sales tax, etc.), regional, and local economies.

We appreciate the opportunity to work with the CGOG in this important endeavor. If you have any questions or concerns, please contact Shiferaw Jemberie (209) 986-9635 (email: Shiferaw.jemberie@dot.ca.gov) or me at (209) 639-8832 (email: Gregoria.ponce@dot.ca.gov).

Sincerely,

Gregoria Ponce'

Gregoria Ponce', Chief
Office of Rural Planning

cc: Caleb Brock, Deputy District Director, Caltrans District 10
State Clearinghouse

bc: **Transportation Planning HQ** —Neil Dixon
Transportation Planning LDR —Austin Sos
Transportation Planning DNAL —Yolanda Tello-Jackson
Transportation Planning - Florigna Feliciano
Traffic Safety- Timothy Hart
Travel Forecasting & Modeling HQ - Nima Kabirinassab
Aeronautics —Ahmed Akhtar, Nirupama Stalin
Air Quality Conformity - Rodney Tavitas, Karishma Becha
Environmental — Brenda Powell-Jones
Advanced Planning—Charles Carrol
Travel Forecasting—Eric Chin
Regional Freight Program – Kelly Eagan