

DEPARTMENT OF TRANSPORTATION

DISTRICT 10

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February 16, 2017

10-CAL-VAR-VAR
Calaveras County
General Plan Update
NOP
SCH # 2017012043Mr. Peter N. Maurer, Director
Calaveras County Planning Department
891 Mountain Ranch Road
San Andreas, CA 95249

Dear Mr. Maurer:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation (NOP) for the Calaveras County General Plan Update (Plan). The Plan represents the County's vision for the future of Calaveras County setting goals and policies to guide County growth and development.

Caltrans applauds the direction of the Plan toward land use diagrams and policies guiding the County to create more livable communities with increased transportation choices and reduced traffic impacts.

The Draft Environmental Impact Report (DEIR) for the Plan should evaluate whether planned circulation improvements with funding are identified to mitigate the level of service (LOS) impacts of the County's projected growth. If insufficient funding is available through existing traffic fees and regional transportation funds, new development in the County needs to help fund transportation improvements to mitigate the growth of the County. CEQA requires that the lead agency implement feasible mitigation measures to reduce the severity of any significant and unavoidable impacts of the Plan.

Currently, Calaveras County doesn't require discretionary review of private development projects when the proposed use is consistent with the existing land use designation and zoning of the parcel. Under these conditions, large projects with significant transportation impacts can be constructed with ministerial approvals which can lead to unmitigated significant impacts to the transportation system. Also, projects with similar traffic impacts may have widely different mitigation requirements depending on whether a tentative map or other discretionary permit is required. While ministerial projects pay only traffic fees, discretionary projects are required to identify and mitigate for project-specific impacts. Because ministerial projects don't mitigate

Mr. Maurer
February 16, 2017
2

project-specific impacts, those impacts are deferred to be addressed as last-in impacts for subsequent projects requiring discretionary permits.

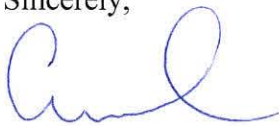
The DEIR should consider whether policies requiring discretionary approval including identification and mitigation of project-specific impacts for commercial, industrial, and high-density residential projects generating in excess of an appropriate threshold of vehicle trips would be a feasible way to reduce the severity of any significant and unavoidable transportation impacts of the Plan.

Caltrans recommends that the DEIR consider the need to review traffic impact fee programs and their associated capital improvement programs to ensure that the cumulative impacts of development are adequately mitigated. Incorporating active transportation, goods movement, and transit facilities into the fee programs would help improve funding of Complete Streets and provide improved transportation choices to reduce reliance on private vehicles. Upon implementation of anticipated SB 743 CEQA Guidelines changes, these change might also act to mitigate vehicle miles traveled (VMT) impacts. The NOP should also consider VMT as a contributor to greenhouse gas emissions impacts.

The Plan references four locations where highway improvements would be required to address LOS deficiencies. Caltrans suggests the County consider modeling LOS for the proposed Murphys Center Turn Lane project on State Route (SR) 4 to determine if the described four lane widening is necessary.

If you have any questions or would like to discuss these comments, please contact Kevin Schroder at (209) 948-1947 (email: kevin.schroder@dot.ca.gov) or me at (209) 948-7325 (email: carl.baker@dot.ca.gov)

Sincerely,



CARL BAKER, Chief
Office of Rural Planning & Administration

c: Jeff Crovitz, Calaveras County Public Works
Melissa Eads, Calaveras Council of Governments
State Clearinghouse