

Thomas P. Infusino
P.O. Box 792
Pine Grove, CA 95665
(209) 295-8866
tomi@volcano.net

August 30, 2017

Amber Collins, Executive Director (sent by email)
Calaveras Council of Governments
acollins@calacog.org

RE: CPC Comments on the Draft 2017 Regional Transportation Plan

Dear Ms. Collins:

My name is Tom Infusino, and I am submitting these comments on the Draft Regional Transportation Plan on behalf of the Calaveras Planning Coalition. As you may know, the CPC is a group that wants a healthy and prosperous future for Calaveras County. We believe that the government makes good plans when it listens to many good people. We seek a future that includes housing, safety, jobs, and services, in addition to agricultural, natural and historic resources.

In rural counties, roads play a pivotal role in our lives. For the good people of Calaveras County, roads are the arteries of commerce, public safety, community relations, and family life. It is through the highways of Calaveras County that people commute, supply their businesses, and receive their customers. Safe and uncongested thoroughfares are the difference between life and death when sheriff, fire, and ambulance services are called into action. Our rural roads take us to the pot lucks, dances, churches, and volunteer endeavors through which distant strangers, isolated by rural acreage, are transformed into close knit communities of caring neighbors. It is on these roads that children return home from school, parents return home from work, and our loved ones take their last journey to their final resting places. In rural counties, roads are far more than just the means to get from point A to point B. They are the essential threads that link together the many colors of our lives, and make our tapestries whole.

I am pleased to say that there are many good aspects of the Draft 2017 Regional Transportation Plan. It is good to see a balance between funds spent on road maintenance and funds spent on capital improvements. It is good to see that so many projects have improving roadway safety as a key component. We greatly appreciate that the 2017 RTP includes a realistic look at the ability to fund the needed roadway improvements, and identifies a list of the fundable projects. We strongly encourage other agencies planning infrastructure and development to take serious note of these road improvement limitations, and to plan their infrastructure and land use designations accordingly. It makes no sense to plan for increased development intensities, and to invest public funds in water delivery and wastewater service, in areas that will not experience growth due to roadway constraints. It makes perfect sense to plan to expand water, wastewater, electricity, and telecommunications infrastructure as needed in those community centers likely to

receive transportation improvements under the 2017 RTP. Ratepayers and taxpayers need other local agencies to follow RTP's lead, and to plan for the future we can afford. We need a short shopping list of infrastructure projects that will cost-effectively facilitate the next increment of desirable growth, not a long Christmas list of infrastructure projects that we cannot afford. By moving in this direction, we facilitate a level of development that keeps the county a desirable place to live, work, and play.

There are a few aspects of the Draft 2017 RTP that need improvement.

First, local governments must come up with new mechanisms to fund necessary road maintenance, as twice as much maintenance is being deferred as is being funded. (Draft 2017 RTP, p. 58.) If local governments show that they can take care of the road infrastructure that already exists, then people may be more willing to entrust these local governments with managing additional roadways.

Second, Road Impact Mitigation Fees (RIM Fees) must be increased to reflect the true share of the road costs associated with new development. It is time for local governments to complete new nexus studies to identify the true road costs attributed to new development, and the fees that must be charged to cover those costs. The lack of adequate mitigation fees is a major reason that the local capital road projects, needed for new economic growth, are so dramatically underfunded. (Draft 2017 RTP, p. 57.)

Third, a policy is needed to commit to designing new roads and major upgrades to provide wildlife-safe underpasses and bridges, as well as wildlife crossing signage. This will mitigate the impacts of roads on wildlife habitat fragmentation, reduce harm to vehicles and passengers caused by collisions with wildlife, and protect the economy from restrictions due to harm to endangered, threatened, and sensitive species. These changes will improve the RTP, mitigate some of its impacts, and also reduce the impacts of development under the County's proposed General Plan Update.

As you may know, the 2017 RTP Guidelines state,

“It is very important that the RTP be consistent with other plans prepared by local, state, federal agencies and Native American Tribal Governments. Consistency can be described as a balance and reconciliation between different policies, programs, and plans. This consistency will ensure that no conflicts would impact future transportation projects.”
(2017 RTP Guidelines, p. 30.)


Unfortunately, there is no formal mechanism to achieve and to maintain consistency between the RTP and local general plans. We strongly encourage CCOG to enter into memoranda of understanding with Calaveras County and with the City of Angels to create and maintain consistency between the CCOG RTP and local general plans. Please add to your list of Mitigation Measures a policy stating, “CCOG will attempt to enter into memoranda of understanding with the County of Calaveras, and with the City of Angels to identify and implement a process to achieve and to maintain consistency between the Regional Transportation

Plan and local general plans.” The County is currently updating the 1996 General Plan. This is an excellent opportunity to achieve RTP and general plan consistency.

In conclusion, we at the CPC want to thank the CCOG for this thought provoking Draft 2017 RTP. As you can see from this letter and the attachments, we are not calling for many changes to the Draft 2017 RTP. Instead, we are calling on other local governments to follow CCOG’s lead, and to plan for a future with an affordable and desirable level of growth.

Our more detailed comments are attached.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Infusino".

Thomas P. Infusino, Facilitator
Calaveras Planning Coalition

cc. CCWD, CPUD, PD, PC, BOS

Reconciling the Draft 2017 RTP and the Draft County General Plan

According to the 2017 RTP Guidelines,

“It is very important that the RTP be consistent with other plans prepared by local, state, federal agencies and Native American Tribal Governments. Consistency can be described as a balance and reconciliation between different policies, programs, and plans. This consistency will ensure that no conflicts would impact future transportation projects.” (2017 RTP Guidelines, p. 30.)

According to the 2017 General Plan Guidelines,

“Regional transportation plans are required to reflect certain population growth and distribution assumptions contained in local general plans. As a practical matter, circulation elements should also reflect the adopted regional transportation plan to ensure access to transportation funds.” (2017 General Plan Guidelines, p. 74.)

Below we suggest ways to reconcile the Draft 2017 RTP and the Draft County General Plan,

1) Reconciling the Draft County General Plan and the 2017 Draft RTP growth estimates.

We appreciate that the RTP looks at a range of growth estimates. Using Caltrans and DOF figures, the draft RTP includes three population estimates for Calaveras County in 2037: 48,205, 51,601, and 53,955. (Draft 2017 RTP, pp. 18, 20, 21.) Underestimating growth can result in infrastructure shortages. Overestimating growth can result in overspending on oversized projects, higher fees, and higher taxes. By looking at a range of growth rather than one estimate, local governments have the information to flexibly and adaptively plan for the future.

We also appreciate that the Draft 2017 RTP’s mid-range growth figure is consistent with the growth projected in the Draft Calaveras County General Plan and CCWD’s Urban Water Management Plan. Using State Department of Finance (DOF) figures, the draft general plan estimates that the population of unincorporated Calaveras County between 2015 and 2035 will grow from 41,857 to 50,355. (Draft General Plan, 7/30/15, p. INT-2.) Similarly, the 2015 CCWD Urban Water Management Plan estimates the population in its service area to grow by about 25% from 2015 to 2040. (CCWD, 2015 UWMP, p. 3-17.)

Fortunately, the Draft 2017 RTP does not stop there, and does not surrender to impractical levels of proposed development. The Draft 2017 RTP goes on to determine how much of the necessary road infrastructure that CCOG anticipates being able to afford, and not afford, through 2037. Additional infrastructure needed to serve additional development during the plan horizon is speculative at best. The CCOG expects to fund the first \$337 million in road projects, but not the other \$363 million in projects. (Draft 2017 RTP, p. 68.) The numbers get worse when you look at local capital improvement projects needed to serve additional growth. The CCOG expects to fund only the first \$35 million of local capital projects, and not the last \$196 million of such projects. In addition, the Draft Calaveras County General Plan’s Circulation Element keeps

roadway level of service standards in place, and only allows very limited exceptions. (Draft Circulation Element, Policy C 2.2) Thus, it is reasonable to conclude that these severe limits to transportation infrastructure funding will also limit local development and population growth.

Given that limited transportation improvements will severely limit new development, we strongly encourage the Draft Calaveras County General Plan to prominently include this information in the introductory section of the Circulation Element. An important purpose of a general plan is to provide the marketplace with accurate information. It is misleading to present growth estimates in the draft general plan, and land use designation maps accommodating five to seven times that growth estimate, without also noting the very practical and severe infrastructure limitations that will constrain that growth. Future investors need both pieces of information to make rational decisions about investing in Calaveras County. Another purpose of the general plan is to enlighten public officials. Local officials concerned with promoting economic growth need this information so they can understand the magnitude of the challenges they face, and the urgency need for decisive action to meet these challenges.

2) Reconciling Road project inconsistencies between the Draft 2017 RTP and the Draft Calaveras County General Plan.

It is important to identify which roadway expansions planned in the Draft Circulation Element of the general plan are also funded in the Draft 2017 Regional Transportation Plan, and which expansions are not funded. This information will help investors to identify those places in the County where development is unlikely to be constrained by roadway capacity. This will help people to properly choose the locations for their homes and business.

For example, the Draft Circulation Element indicates that roadway segments in two areas of the County will exceed the level of service standards with growth planned under the draft general plan. These segments are on Highway 26 entering Valley Springs, and on Highway 4 entering Murphys. (Draft Calaveras County General Plan, Figure CIR-2.) The Draft Circulation Element also indicates that road improvements are planned for these two areas. (Draft Calaveras County General Plan, Figure CIR-3.) Are these roadway improvement part of the funding constrained project list in the Draft 2017 Regional Transportation Plan? If not, some mention of that should be made in the Draft Circulation Element.

The Draft Circulation Element also identifies additional roadway improvements. These include the Wagon Trail Project on Highway 4, road widening on Murphys Grade Road and Highway 4, road widening on Highway 12 in the Wallace/Burson area, and upgrades on O'Byrnes Fairy Road from Copperopolis to the County Line. (Draft Calaveras County General Plan, pp, C-4, and C-7) Are these roadway improvement part of the funding constrained project list in the Draft 2017 Regional Transportation Plan? If not, some mention of that should be made in the Draft Circulation Element.

In addition, the Draft Circulation Element should describe the aforementioned roadway improvements in the same level of detail as the Draft 2017 RTP, so that people can tell for themselves which projects are likely to be funded and which are not. For example, it is not clear

if the upgrades to O'Byrnes Ferry Road vaguely referenced in the Draft Circulation Element are the same as those in the Draft 2017 RTP's Table 4.1b "Calaveras County Illustrative Projects." This is important to know, as the latter O'Byrnes Ferry Road projects are not on the funding constrained list, and do not even have cost estimates listed. Similarly, the Draft Circulation Element anticipates the construction of the Wagon Trail project, but does not specify which phases. (Draft Calaveras County General Plan, p. C4.) It is important to know this, as phases 3 and 4 of the Wagon Trail project are not on the Draft 2017 RTP funding constrained list, but are instead on the unfunded list of illustrative projects.

As noted above, an important purpose of a general plan is to provide accurate information to inform the marketplace. It would be misleading to identify anticipated roadway improvements in the general plan, when it is known that they are not likely to be funded.

The Draft 2017 RTP identifies a list of funding-constrained roadway improvements. Funding for additional roadway capacity expansions is unlikely. We hope that the County will use these funding-constrained roadway improvements as the foundation of the Circulation Element's planned future roadways. This, in turn, can be used to identify achievable levels of development during the plan horizon, and beyond. This would be the most prudent way for the County's General Plan Update to become consistent with the 2017 RTP.

3) Policy Consistency and Inconsistency between the Draft 2017 RTP and the Draft General Plan.

A) Policy Consistency between the Draft 2017 RTP and the County's Draft Circulation Element.

It is good that the Circulation Element of the Draft Calaveras County General Plan reflects many of the goals, policies and objectives provisions of the Draft 2017 RTP. For example:

-Goal 1, Objective 1A of the Draft 2017 RTP promotes all modes of transportation, encourages connectivity between modes, seeks connectivity between key destinations, and considers Context Sensitive Solutions for roadway improvements. All of these concepts are reflected in the goals, policies, and implementation measures of the Draft Circulation Element. (See Policies C 2.6, C 5.2, C 1.13, C 1.9, and Implementation C-5A.)

-Goal 1, Objective 1C of the Draft 2017 RTP ask local governments to consider roadway capacity when making land use decisions. The Draft Circulation Element does just that in Policies C 2.1 and C 2.2.

-Goal 1, Objective 1D of the Draft 2017 RTP calls for traffic study standards and the operation of benefit basins and mitigation fee programs. The Draft Circulation Element includes such provisions. (See Policy C 2.4, C 2.11, and Implementation C-2B.)

-Goal 6, Objective 6A seeks to have roads built to County standards and well maintained. The Draft Circulation Element aims for the same result. (See Policy C 2.7 and C 2.8.)

-Goal 12 seeks an efficient network of bikeway and pedestrian facilities in the County. The Draft Circulation Element Policies seek a similar outcome. (See Policies C 5.1, C 5.2, and C 5.3.)

We thank the County and the CCOG for finding common ground on these important transportation concepts.

B) Reconciling Policy Inconsistency between the Draft 2017 RTP and the County's Draft Circulation Element.

There are a number of provisions of the Draft 2017 RTP that need County participation to be effective, but are not reflected in the County's Draft Circulation Element. For example:

-Objectives 1F and 10A of the Draft 2017 RTP seek road improvement on County facilities to improve the safety and efficiency of truck traffic. The Draft Circulation Element does not.

-Objective 3A of the Draft 2017 RTP calls for transportation projects to support a sustainable environment including the preservation of open space and agricultural lands. The Draft Circulation Element does not.

-Policy 11A of the Draft 2017 RTP calls for local jurisdictions to work with Caltrans to develop standards for crosswalks, lighting, signage, travel lanes, and speed limits on State Highways to improve pedestrian safety and connectivity. The Draft Circulation Element does not. (We also note that the lack of such standards greatly complicated the recent review of the lot split for the proposed Dollar General Store along Highway 26 in West Point.)

-Objective 13B of the Draft 2017 RTP calls for local governments to improve safety at locations with high numbers of bicycle and pedestrian related collision. The Draft Circulation Element does not.

-Policy 17.2 of the Draft 2017 RTP promotes off-street parking to help decrease congestion in community commercial centers while supporting the local economy. The Draft Circulation Element does not.

The Draft 2017 RTP provisions noted above represent good steps to improve safety, aid the economy, and protect the environment. We strongly encourage Calaveras County to achieve consistency with the 2017 Draft RTP by including similar policies and implementation measures in its Circulation Element. The County must be an active partner in these endeavors if people are to reap the benefits of these particular 2017 Draft RTP policies. In addition, if the County adopted such implementation measures with sufficient commitment to achieve measurable standards, then the County could mitigate impacts of development under the Draft General Plan.