

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

Mar 17 2021

STATE CLEARINGHOUSE

March 17, 2021

Adam Henriques
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Blvd
South Lake Tahoe, CA 96150

RE: Waste Discharge Requirements for
Nonpoint Source Discharges Related to
Certain Activities Conducted by the BLM
and USFS on Federal Lands– Notice of
Preparation of an Environmental Impact
Report (NOP)
SCH # 2021020158
GTS # 07-MULTIPLE-2021-00222

Dear Adam Henriques:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The purpose of the proposed project is to ensure the maintenance, protection, and restoration of the quality and beneficial uses of water on federally managed lands and to facilitate federal agency compliance with water quality requirements. The Lahontan Water Board will consider the inclusion of a Clean Water Act Section 401 Water Quality Certification in conjunction with the Waste Discharge Requirements in an effort to provide comprehensive Water Board coverage for those activities proposed for regulation under the Federal NPS Permit. The Lahontan Regional Water Quality Control Board is the Lead Agency under the California Environmental Quality Act (CEQA).

From reviewing the NOP, Caltrans has the following comments:

- Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The Board can also refer to Caltrans' updated *VMT-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.
- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified

safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the Board’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

- Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For more TDM options, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans’ review.

If you have any questions about these comments, please contact Mayra Jimon, the project coordinator, at Mayra.Jimon@dot.ca.gov, and refer to GTS # 07-MULTIPLE-2021-00222.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse