

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

Governor's Office of Planning & Research

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**STATE CLEARINGHOUSE**

March 1, 2019

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GTS I.D. 14351

Ms. Edith Hannigan  
Forestry and Fire Protection, Board of  
916-653-8007  
P.O. Box 944246  
Sacramento, CA 95650

**Notice of Preparation of a Program Environmental Impact Report for the California Vegetation Treatment Program**

Dear Ms. Edith Hannigan:

Thank you for providing Caltrans the opportunity to review and comment on the Notice of Preparation of a Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP) proposed by the California Board of Forestry and Fire Protection. Under the CalVTP, the California Department of Forestry and Fire Protection (CAL FIRE) would implement vegetation treatments to reduce wildfire risks and avoid or diminish the harmful effects of wildfire on the people, property, and natural resources in the State.

Caltrans employs a wide range of professionals across the State, some of whom recently or currently assist in reducing the threat of wildfire, managing fire fuel and protecting the State's natural resources. And for this reason, we offer the following comments:

**General Comments**

- Please include the State Highway System (SHS) Right-of-Way (R/W) for the scope of the CalVTP PEIR.
- Caltrans requests that Cal Fire engage with Caltrans Headquarters (HQ) Division of Maintenance - Forest Management Program, HQ Division of Environmental Analysis, and HQ Division of Traffic Operations - Encroachment Permits to outline fuels treatment project priorities, environmental compliance, and the maintenance cycle to maintain the defensible space within the state highway R/W, which will require encroachment permits. Please include technical practices and procedures that will need to be further defined by District Maintenance, Environmental and Design staff that addresses project/program scope regarding vegetation treatments.

- Caltrans appreciates ongoing engagement and participation in vegetation management planning and operations to aid in the Board of Forestry and Fire Protection's efforts.
- Caltrans has traffic safety concerns related to smoke from prescribed burns limiting visibility on the SHS. Please consider sight distance and logistics staging of workers, equipment, and activities.
- Caltrans performs fire hazard control activities to roadside grasses to reduce fire risk. Additional fuels treatment is needed to address all levels of fire fuels (i.e., thinning of shrubs and trees), which includes embankment protection and potential ditch debris removal. Caltrans' collaboration with Cal Fire to identify and partner on projects within very high severity fire risk zones along highways is a desired effort in creating clear recovery zone areas and SHS defensible space in the event of natural occurring events.

### **Transportation Management Plan**

A Transportation Management Plan (TMP) should be prepared with Caltrans input to outline the process of minimizing project related traffic impacts and delays associated with the prescribed burns and vegetation control adjacent to proposed SHS areas throughout the State. This plan would provide a framework for the implementation of traffic control strategies and timely distribution of traffic related information to emergency services and the local citizens and businesses throughout the life of the PEIR.

The TMP is an approach for alleviating or minimizing work-related traffic delays by the effective application of traditional traffic handling practices that may include innovative combination of various strategies. These strategies include public awareness campaigns, motorist information, incident management, construction methods, demand management, and alternate route planning. Depending on the complexity of the work or magnitude of anticipated traffic impacts, a TMP may provide lane requirement charts, Standard Special Provisions (SSPs) for maintaining traffic. The schedule and staging of logistics for workers, equipment, and activities are a requirement to properly communicate, plan, and execute coordination and implementation efforts for these activities in work zone areas.

Caltrans Transportation Management Plan Guidelines:

<http://www.dot.ca.gov/trafficops/tm/tmp.html>

### **Encroachment Permit**

- Any work to occur in Caltrans' R/W, including temporary shoulder or lane closures, requires a Caltrans encroachment permit. Any temporary constructed access will be required to be removed upon completion. Also, installation of permanent signs, as department policy, are not permitted within Caltrans' R/W.

- We request that Cal Fire engage with Caltrans District Traffic Operations and Permits staff for interaction regarding any encroachment permit, impacts to the SHS and its travelers, traffic control measures or other mitigation measures, and other requirements such as tree trimming and removal procedures. [[Appendix K](#) (2018 update) of the [Caltrans Encroachment Permit Manual](#) has specific provisions for tree trimming and tree removal in Caltrans R/W].
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding studies.

#### **Hydrology and Drainage**

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review, if applicable.
- Please consider soil displacement as prescribed burns are undertaken, including erosion, increased turbidity in waterways, and general soil stability.
- Please address recent burn areas where potential debris flows near and adjacent to the SHS, especially upslope.

#### **Scenic Highway**

- Cal Fire will interact with Caltrans District Landscape Architect staff regarding tree removal or trimming within a State Scenic Highway corridor.

#### **Resources**

- For all vegetative removal areas, please consider cultural resources and Native American areas of special concern.
- As an agency with fee title and easement holdings over a considerable extent of land, Caltrans is responsible for compliance with Public Resources Code (PRC) 5024 (which is intended to require that State Owned Historic Resources are protected and managed). Impacts to State Owned Historic Resources through the CalVTP within Caltrans' R/W may require assessment and mitigation. The Cal VTP should be implemented in such a manner as to avoid impacts to State Owned Historic Resources.
- The PEIR should address conflicts between CalVTP objectives and existing laws and policies, such as emergency response protocols where Habitat Conservation Plans have been established, locations that are otherwise subject to State Senate Resolution 1334

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for the Preservation of Oak Woodland Habitats, where the Migratory Bird Act may be invoked, and how Species of Special Concern, endangered and threatened species may be affected.

- Caltrans has adopted Best Management Practices to prevent the spread of pathogens, such as Sudden Oak Death, Port Orford Cedar Root Disease and chytrid fungus, which has shown to have negative impacts amphibian populations. We employ measures to limit the risk of noise impacts (i.e., acoustic trauma) within critical habitat areas and during certain time periods. We have observed construction practices that minimize erosion and sedimentation upstream of cross-highway culverts to ensure drainage systems are not compromised and salmon-bearing streams remain biologically productive.
- Caltrans currently maintains vegetation within Caltrans' R/W and we have concerns about changes in the roadside environment that may substitute a less fire-resistant plant species through changes in maintenance activities. Vegetation management treatments such as fire fuel thinning, back burns, control burns or grazing may result in either listed species eradication or proliferation. Caltrans is concerned with increasing grazing opportunities adjacent to the roadway which could result in more vehicle collisions with wildlife.

We may provide additional comments forthcoming that have technical value and may contribute towards a more thorough PEIR, please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. Should you have any questions regarding this letter, please contact Bo Wu at (916)-651-8197 or [bo.wu@dot.ca.gov](mailto:bo.wu@dot.ca.gov).

Sincerely,

CHRISTIAN BUSHONG  
Branch Chief, Local Development-Intergovernmental Review  
Headquarters

c: Coco Briseno, Caltrans Deputy Director of Planning and Modal Programs  
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State Clearinghouse