

DEPARTMENT OF TRANSPORTATION

DIVISION OF TRANSPORTATION PLANNING
1120 N Street, MS-32
SACRAMENTO, CA 95814
PHONE (916) 653-0548
FAX (916) 653-4520
TTY 711
www.dot.ca.gov



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Governor's Office of Planning & Research

AUG 07 2019

STATE CLEARINGHOUSE

August 7, 2019

Attention: Edith Hannigan
Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244-2460

SCH#: 2019012052
GTS# 74-ALL-2019-00098
Statewide

Subject: Draft-Program Environmental Impact Report (DPEIR) for the California Vegetation Treatment Program (VTP)

Dear Ms. Hannigan:

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft- Program Environmental Impact Report (DPEIR) for the proposed Statewide Vegetation Treatment Program. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

The project proposes 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 of California. The project has a statewide scope. As owner and operator of the State Highway System (SHS), Caltrans is a responsible agency and has the following comments:

General Comments:

1. Caltrans has concerns related to potential limited visibility on state highways from prescribed treatment burn smoke. Please review Caltrans Highway Design Manual (HDM) Section 100 for sight distance and the Transportation Management Plan (TMP) logistics (e.g. time of day, stop control, equipment and worker staging areas, and other fire treatment related activities).

For more information on sight distance and traffic management refer to the following website: <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>

2. 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 desires collaboration with Cal Fire to identify and partner on projects within high severity fire risk zones along highways. Collaboration will help the effort of creating a clear recovery zone area and SHS defensible space in the event of a naturally occurring fire or other hazard.
3. Coordination with federal vegetation treatment plans for federal lands adjacent to the state Right-of-Way (R/W) is recommended.

Scenic Highway:

4. Caltrans requests Cal Fire's consultation with District Landscape Architect staff regarding tree removal or trimming within a State Scenic Highway Corridor.

Transportation Planning / Traffic Operations:

5. Please coordinate further with Caltrans' Traffic Operations and Maintenance for any activity that may occur in proximity or on Caltrans facilities.
 - a. If Cal Fire operations require any staging or activities on Caltrans facilities, the applicant must submit a traffic handling plan in addition to traffic management plans for further review during any encroachment permit process.
 - b. Vegetation removal may destabilize the surface soil layer. Make certain that soils remain stable to prevent unnatural erosion and debris from occurring.
 - c. During operations, please limit the amount of debris that may fall into Caltrans facilities. Please ensure that Caltrans culverts and drainage remain free from any debris and unobstructed.

Permits R/W:

6. 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 Caltrans' R/W prior to activity. As part of the encroachment permit process, the applicant must provide an approved final environmental document including California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>
For Caltrans District Encroachment Permits Contacts please refer to the following link: <https://dot.ca.gov/programs/traffic-operations/ep/district-contacts>

Resources:

7. For all vegetative removal areas, please consider cultural resources and Native American areas of special concern. Please coordinate with Caltrans' District Native American Liaisons.
8. As an agency with fee title and easement holdings over a considerable extent of land in the vegetation treatment project area, Caltrans is responsible for compliance with Public Resource 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 Cal VTP 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.

Maintenance:

9. The California Vegetation Treatment Program (Cal VTP) includes three general types of treatments: wildland-urban interface (WUI) fuel reduction; fuel breaks that actively support fire control activities; and ecological restoration projects to restore ecosystem processes, conditions

and resiliency to reflect historic vegetative composition, structure and habitat value. Due to the linear nature of the State Highway System (SHS) in every county in California, Caltrans has a strategic opportunity to participate in wildfire risk reduction to the state's people and natural resources under the coverage provided by Cal VTP. Caltrans Maintenance Forest Management Program has identified three primary land management objectives for vegetation treatment types covered by Cal VTP that may need further discussion in the document. 1) to reduce wildfire ignitions that originate from vehicles on the state highway system right of way; 2) to reduce emergency expenditures necessary to restore the highway infrastructure after wildfire; and 3) to restore vegetation in burn areas to re-establish resilience where debris flow, slope instability and flooding have increased and threaten the safety of highway users.

10. Defensible space zone along highways is envisioned as a band of vegetation treatment beyond the existing Clear Recovery Zone (CRZ) along all miles of state highways. CRZs are typically a clear zone with no vegetation other than ground cover. Treatable acres along roadways should include a discussion of CRZs in the Cal VTP. For more information concerning CRZ please refer to the Caltrans HDM Chapter 300 at the following website: <https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>
11. Land management objectives for defensible space to reduce wildfire risk and increase safety should be determined by a collaborative effort with Caltrans, Cal Fire, local agencies, and stakeholders in developing effective vegetation treatment baseline condition and alternatives once a baseline condition is established.
12. Please clarify if Cal Fire's existing Chaparral Management Program is combined with the existing Vegetation Management Program (VMP), and the extent of coverage these programs have under the Cal VTP.
13. As noted in Section 3.12, "Land Use and Planning, Population and Housing," ...achieving the identified treatment acreage target under the Cal VTP within the vegetated roadside of the R/W owned and maintained by the SHS would require dedicated vegetation treatment

crews within Caltrans Maintenance to maintain the fuels reduction risk reduction investment on a five-year maintenance cycle. Please discuss how the Cal VTP would support maintenance activities.

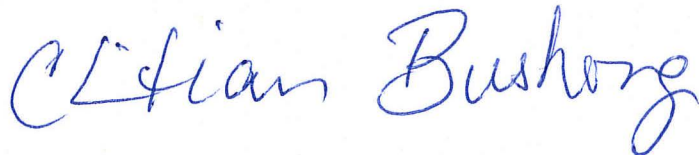
14. As noted in Table 3.12-3 in Section 3.12, "Land Use and Planning, Population and Housing," the majority of counties in California, including those in the 20.3 M acres of treatable landscape for the proposed Cal VTP, are expected to experience population growth, and associated expansion of development, by 2060 (DOF 2018). The expansion of development will result in increased demand for multimodal transportation facilities to serve the additional population. Please add discussion to the Cal VTP to affect that treatable landscape priorities should be considered higher where land-use pressure and transportation investment demand overlap.
15. As noted in Section 4.4.14, "Transportation," the geographic scope of the cumulative transportation analysis covers the entirety of the treatable landscape and the surrounding roadway network used to access individual vegetation treatment sites. The SHS is comprised of 51,900 lane miles of roadway and approximately 350,000 acres. Of the 350,000 acres, approximately 98,000 is managed as pavement and 252,000 acres is considered roadside.

A highly variable roadside vegetation condition exists, generally divided into "landscaped" and "non-landscaped" roadsides. Maintenance of landscaped roadside, (acres without planting or irrigation system design improvements), occurs on approximately 31,400 acres. Close to 210,000 acres are potentially treatable vegetation acreage (non-landscaped acres) along the state highway. Assessment of the existing treatable acres and condition as a "natural asset" is not discussed as an activity under Cal VTP but would be essential to establish a baseline condition (Refer to item 11: Land Management Objectives).

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Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Lloyd Light (916)651-8204. Email Lloyd.Light@dot.ca.gov

Sincerely,



Christian Bushong, LD-IGR Branch Chief
Office of Smart Mobility and Climate Change
Division of Transportation Planning

c: Coco Briseno, Caltrans Deputy Director of Planning and Modal Programs
Steve Takigawa, Caltrans Deputy Director of Maintenance and Operations
Karla Sutliff, Caltrans Deputy Director of Project Delivery
Scott Morgan, Deputy Director Administration, State Clearing House, OPR