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Common Response 14: Transportation

Overview

This Common Response addresses recurring themes of public comments received on Chapter 20, *Transportation*. These themes include but are not limited to information regarding Vehicle Miles Traveled (VMT) analysis and significance threshold and the Level of Service (LOS) roadway segment and intersection analysis. Given the above, the response discusses Delta Conveyance Project (project) compliance with Senate Bill (SB) 743 and the methodology used to determine roadway segments and intersections analyzed in Appendix 20A, *Delta Conveyance 2020 Traffic Analysis*, and Appendix 20C, *Delta Conveyance 2040 Traffic Analysis*.

Methodology and Approach to Impact Analysis

The primary transportation measure used in this Delta Conveyance Project Environmental Impact Report (EIR) is VMT, which is consistent with SB 743 and California Environmental Quality Act (CEQA) Guidelines Section 15064.3. The process for VMT analyses is described in the *Process and Methods of Vehicle Miles Traveled Analysis* section of Chapter 20.

A supplemental analysis of LOS (not required by CEQA) is provided for informational purposes in Appendix 20A to address the potential need to develop local and regional transportation improvements to reduce project construction-related traffic volumes. The LOS analysis can be used to aid local jurisdictions to identify roadway and intersection improvements that may be needed because of the project.

As directed in CEQA Guidelines Section 15064.3, a “project’s effect on automobile delay shall not constitute a significant environmental impact,” but this analysis is included in the appendices to this EIR chapter on a voluntary basis as a secondary measure of traffic impacts from constructing and operating the project alternatives and can be used to inform analyses in the U.S. Army Corps of Engineers (USACE) Delta Conveyance Project NEPA Environmental Impact Statement.

Vehicle Miles Traveled

The Draft EIR followed the best practices and guidance provided by the Governor’s Office of Planning and Research (OPR) in its Technical Advisory on Evaluating Transportation Impacts in CEQA (California Governor’s Office of Planning and Research 2018). The transportation analysis is based on the project’s construction, operations, and maintenance, and compensatory mitigation data for construction employee traffic provided in Appendix 23B, *Air Quality and GHG Analysis Activity Data*. VMT is estimated quantitatively using the following results provided in Appendix 23B.

- Duration of construction activities.
- Total VMT during construction activities.
- Average VMT per employee.
- Comparison of average VMT per construction employee to regional average.

As discussed in the *Environmental Impacts* section at the beginning of Chapter 20, LOS can no longer be used for evaluating project traffic impacts under CEQA with the passage of SB 743 and adoption of the amended CEQA Guidelines implementing SB 743 (CEQA Guidelines § 15064.3).

Per CEQA Guidelines Section 15064.3(c), VMT is the primary metric for analyzing traffic impacts on all CEQA projects after July 1, 2020. VMT is defined as the amount of travel that occurs in automobiles; in terms of a project like the Delta Conveyance Project, VMT is defined as the number of miles workers drive in automobiles (i.e., automobiles and light trucks) from places of residence to the work site park-and-ride lot and back during the project's construction, operations, and maintenance.

The goal of quantifying SB 743 home-based work VMT is to determine whether the project alternatives would affect the environment by increasing the amount of commute miles that construction workers would drive in their automobiles (personal car or truck) to and from the project work sites daily when compared to the regional average of home-based work VMT per employee.

The goal of SB 743 is to quantify home-based work VMT and develop potential mitigation measures to reduce the amount of VMT generated by construction employees. Therefore, SB 743 VMT does not include commercial vehicle trips and the delivery of materials that will be used for construction in its definition of VMT. These truck trips for construction of the project alternatives are included in the roadway segment and intersection analysis contained in Appendices 20A and 20C. CEQA Guidelines Section 15064.3(a) states that VMT refers to the amount and distance of *automobile* travel attributable to a project. In its December 2018 publication titled *Technical Advisory on Evaluating Transportation Impacts in CEQA*, OPR explains that the term *automobile*, as used in Section 15064.3(a), "refers to on-road passenger vehicles, specifically cars and light trucks"; heavy vehicles are not included in the definition (California Governor's Office of Planning and Research 2018:4). Therefore, truck trips for construction of the project alternatives are not included in the VMT calculations in the Chapter 20 section titled *Impacts and Mitigation Approaches*, the impact and mitigation of Impact TRANS-1: *Increased Average VMT Per Construction Employee versus Regional Average*, or the conclusion of significant and unavoidable with mitigation.

All truck trips (light duty, medium duty, and heavy duty) used for construction of the project alternatives are included in the roadway segment and intersection analysis provided in Appendices 20A and 20C and in the air quality and greenhouse gas analysis provided in Chapter 23, *Air Quality and Greenhouse Gases*.

It should also be noted that the EIR included both employee and commercial vehicle trips in analyzing direct and indirect environmental impacts on the local and regional transportation system. Additionally, the Delta Conveyance Engineering Project Reports (EPRs) (Delta Conveyance Design and Construction Authority 2022a, 2022b) included a detailed list of proposed construction management and design requirements (as described in detail in the Chapter 20 section titled *Impacts of the Project Alternatives on Transportation*) that would reduce effects on the community from construction-related traffic (employee cars and commercial trucks) on Delta communities. These requirements and limitations on both construction worker- and truck delivery-related activities from using most Delta roadways are intended to enhance public safety and reduce traffic congestion during construction of the project. The transportation analysis included the project's effect on traffic circulation patterns and resulting mitigation measures to reduce potential safety impacts to the Delta's multimodal transportation system serving vehicles, transit, bicyclists, and pedestrians.

In addition to substantial transportation facility improvements to serve construction workers and material delivery trucks, the California Department of Water Resources (DWR) will conduct

preconstruction pavement and roadway analysis of access roadway segments on local and county roads to determine the need to improve a detailed list of segments included in the conceptual design of the project alternatives EPRs (Delta Conveyance Design and Construction Authority 2022a, 2022b). Road improvement activities to serve both cars and trucks would include pavement remediation (e.g., fill potholes, asphalt cracking and slurry seals), widening travel lanes to a minimum of 12 feet, and improvements to roadways and bridges. After completion of a project site, the condition of the pavement and roadway will be reviewed, and remediation will be completed as necessary to return the facility to the improved condition that DWR constructed.

Threshold of Significance for Vehicle Miles Traveled

In its technical report on VMT (Governor's Office of Planning and Research 2018), OPR recommends that a per capita or per employee VMT that is 15% below that of existing development may be a reasonable threshold of significance for residential, office, and mixed-use projects. In contrast, OPR does not have a recommendation for a threshold for construction of large infrastructure projects like the Delta Conveyance Project.

Therefore, the use of the 15% reduction threshold of significance was determined to not be appropriate as the baseline for analysis (CEQA Guidelines § 15382) because it is not directly applicable to major infrastructure construction projects that generate minimal trips during the operation and maintenance of the completed project.

Furthermore, OPR's recommended standard of a 15% reduction was also based on greenhouse gas (GHG) reduction, not transportation concerns, and this project thoroughly covers GHG reduction concerns and mitigation measures in Chapter 23.

CEQA allows a lead agency to establish thresholds of significance that it finds applicable to the type of project at hand. Therefore, DWR has chosen to use the threshold of no net increase in the regional VMT per employee based on the type of project that is being constructed compared to the types of projects (residential, office and mixed-use) that were the basis of OPR's recommendation.

Using this no net increase in the regional VMT per employee, Chapter 20 identified an impact conclusion of significant and unavoidable with mitigation for Impact TRANS-1.

Impact TRANS-1 construction of the project alternatives would result in additional VMT to the regional transportation system and increase the total amount of driving and distances traveled for home-based work trips. The Draft EIR includes detailed provisions and requirements that DWR has incorporated into Mitigation Measure TRANS-1: *Implement Site-Specific Construction Transportation Demand Management Plan and Transportation Management Plan*.

Mitigation Measure TRANS-1 would reduce the severity of Impact TRANS-1 by implementing transportation measures that would decrease the total amount of construction employee travel on Delta roadways, incentivize carpooling and vanpooling, and establish state, regional, or local agency coordination to construct the park-and-ride lots and roadway improvements that are designed to minimize VMT-related transportation issues.

Roadway Segment and Intersection Level of Service Analysis

Even though LOS is no longer the primary analysis criteria for the CEQA document, DWR will use the study roadway segment and intersection analysis contained in Appendices 20A and 20C in

coordination with local agencies to determine improvements during the construction phase of the project. As a state agency, DWR is not subject to local policies regarding LOS. The Notice of Preparation and Scoping Process (January 2020) with the California Department of Transportation (Caltrans) identified a total of 66 Caltrans freeway and highway segments that were located adjacent to or within the alignments of the project alternatives. During this scoping process, Caltrans excluded State Route 99 because they considered this parallel facility to I-5 (with 18 segments analyzed) to be beyond the area of potential impact and mitigation.

The Notice of Preparation and Scoping Process with the local city and county agencies identified an additional 54 roadway segments that were located adjacent to or within the alignments of the project alternatives in the Sacramento Delta region. The overall result was a total of 120 roadway segments that were analyzed in Appendices 20A and 20C.

Based on the regional and local travel routes of construction workers to and from either park-and-ride facilities or a limited number of work sites, and estimated truck traffic delivering project materials to and from project features, a total of 120 roadway segments presented in Appendix 20A, in the table titled Roadway Study Segments Analyzed, were identified for analysis. These roadway segments were identified as part of the Notice of Preparation scoping process and prior to the development and preparation of the Delta Conveyance EPRs (Delta Conveyance Design and Construction Authority 2022a, 2022b).

The EPRs include design requirements to reduce effects on the community from construction-related traffic on Delta roadways. These limitations and major road improvements are intended to enhance public safety and reduce traffic congestion during construction and are described in the *Impacts of the Project Alternatives on Transportation* section of Chapter 20.

A combination of Transportation Management Plans (described in Mitigation Measure TRANS-1: *Implement Site-Specific Construction Transportation Demand Management Plan and Transportation Management Plan*) and improvements to the transportation system would be developed in coordination with the State of California and local agencies to reduce potential traffic safety hazards at key intersections and increase emergency access to Delta communities within Sacramento County, San Joaquin County, Yolo County, Solano County, and Contra Costa County.

Road Rehabilitation and Chapter 3

Chapter 3, *Description of the Proposed Project and Alternatives*, section titled *Access Roads*, described the types of access roads needed for the project. This section described the road improvements and rehabilitation for the project as analyzed throughout the EIR. The Final EIR includes clarifying text in this section identifying the roads to be assessed and rehabilitated to the improved conditions after construction. The clarifying text discusses how road improvements would be identified, the types of improvements that would occur, and rehabilitating roads to improved conditions after construction. The clarifications regarding road rehabilitations in Chapter 3 do not result in a new significant environmental impact or substantial increase in the severity of an environmental impact or require additional mitigation measures to which DWR was unwilling to commit.

References Cited

California Governor's Office of Planning and Research. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December. Sacramento, CA.

Delta Conveyance Design and Construction Authority. 2022a. *Volume 1: Delta Conveyance Final Draft Engineering Project Report—Central and Eastern Options*. May 2022. Sacramento, CA.

Delta Conveyance Design and Construction Authority. 2022b. *Volume 1: Delta Conveyance Final Draft Engineering Project Report—Bethany Reservoir Alternative*. May 2022. Sacramento, CA.