SB 743 Environmental Essentials in Project Development and Delivery

Following the passage of SB 743 (Steinberg, 2013), vehicle miles traveled (VMT) became a metric for determining transportation impacts under the California Environmental Quality Act (CEQA). This shift reflects the State's changing priorities to pivot away from prioritizing vehicular travel toward encouraging multi-modal transportation solutions as part of California's efforts to reduce greenhouse gas emissions and discouraging sprawling development patterns. In September 2020, Caltrans adopted new guidance directing that induced VMT from highway capacity expansion should be analyzed, avoided, and/or mitigated when impacts are anticipated. In this way, VMT is now treated as a metric similar to those used for other, more familiar environmental resources that we regularly consider during our environmental analysis. However, the practice of avoiding and mitigating induced traffic is not yet as well-developed and there are questions as to how we can adapt our current practices and processes to this new aspect of our environmental evaluations. To address this, the Sustainability Program in the Caltrans Director's Office is providing on-going technical assistance, reviewing draft environmental documents, and providing supplemental guidance as needed.

This paper is the first of a three-part series that will summarize relevant requirements, best-practices, and implementation approaches for the Districts and their partners to consider. The goal of this series is to foster a shared understanding of the terms and issues involved, and to support Caltrans' various project development team (PDT) members with the challenge and opportunity of moving Caltrans' investments in a new direction. The three topics envisioned for this series are:

1. "*SB 743 Environmental Essentials in Project Development and Delivery*", which focuses on planning and project delivery best-practices, as well as CEQA standards such as legal adequacy, good-faith-effort, and mitigation implementation assurance.
2. "*A Mitigation Playbook*", which will focus on different mitigation options and approaches for estimating the VMT reductions anticipated from those various measures.
3. "*Implementation Frameworks*", which will focus on different project management and administrative models for carrying out VMT mitigations and monitoring them over time.

These papers are not intended to serve as adopted policy or formal guidance, they do not establish new technical analysis requirements, constitute formal rulemaking or otherwise set new legal standards of care, nor will they exhaustively cite CEQA or NEPA statute or related case-law, or describe the nuances of Caltrans' planning, programming, or capital project delivery process. The advice and options shared here simply reflect common comments and emerging efforts to address SB 743 implementation. The sections titled "*Duties and Deliverables*" are illustrative examples of specific actions that could be taken at different points by different functional units to influence project outcomes and avoid potentially significant VMT impacts. Additional examples are encouraged. It is anticipated that various program managers and process-owners will complete more detailed updates to their policies, processes, and

procedures over time. Questions, comments, and concerns regarding these principles should be discussed by the Districts and Divisions and referred to the Sustainability Program at: sb743.implementation@dot.ca.gov.

The summary below generally focuses on incorporating environmental outcomes in the planning, environmental, and project delivery process. For the sake of brevity, common CEQA and National Environmental Policy Act (NEPA) terms, as well as more detailed nuances and process-steps of Caltrans' various organizational silos are not discussed in-depth.

I. Balancing Transportation and Environmental Outcomes

One of CEQA's primary principles is to ensure the adequate protection of California's communities and natural environments. CEQA also envisions that lead agencies must simultaneously juggle multiple priorities and balance outcomes between their equally important goals. For Caltrans, this means that we are asked to both enhance mobility through the delivery of transportation system investments, while also attaining environmental objectives such as the reduction of VMT and greenhouse gas (GHG) emissions. For example, consider the strategic objectives in Goal #3 of the Caltrans Strategic Management Plan:

> *"PEOPLE: Improve the quality of life for all Californians by providing mobility choice, increasing accessibility to all modes of transportation and creating transportation corridors not only for conveyance of people, goods, and services, but also as livable public spaces.*
>
> *PLANET: Reduce environmental impacts from the transportation system with emphasis on supporting a statewide reduction of greenhouse gas emissions to achieve 80% below 1990 levels by 2050.*
>
> *PROSPERITY: Improve economic prosperity of the State and local communities through a resilient and integrated transportation system."*

Achieving this balancing act between the State's equally important mobility and environmental objectives requires us to consider environmental outcomes when planning system investments, even before the formal environmental process. This is why we should carefully consider how we frame a project's purpose and need during project initiation. For example, a project's purpose and need statement (i.e. its objectives), should not focus solely on advancing transportation outcomes, as historically described through terms such as "congestion relief" or "travel-time savings", but should also seek to achieve environmental outcomes as well. Consideration of purpose and need in this light is partly motivated by CEQA's requirement for "plan-consistency", or a project's alignment or conflict with relevant goals and policies adopted by lead and responsible agencies. To evaluate plan-consistency for transportation projects, relevant goals and policies can be found in the *California Transportation Plan* and other statewide modal plans, the *Climate Action Plan for Transportation Infrastructure* (CAPTI) adopted by the California State Transportation Agency, or in related Regional Transportation Plans, General Plans, etc. In essence, CEQA asks us to ensure that our projects are consistent with our adopted goals and policies, so we should evaluate whether our purpose and need statements and

project alternatives are focused achieving the balanced outcomes that our goals envision. Plan consistency could be a particular concern where project alternatives may be clearly focused on achieving auto-centric outcomes at the expense of attaining other environmental and community outcomes that Caltrans has espoused as central to its organizational goals (e.g. multi-modalism, VMT/GHG reduction, equity, etc.). Given that such potential inconsistencies may have schedule and cost implications in later phases (i.e. significantly refining alternatives or even rescoping projects that are already in delivery), it is a best practice to proactively craft purpose and need through a broader lens at project initiation. This may be a particular concern where a fair argument might be made by project opponents that certain options and impacts have not been adequately evaluated or a project's purpose and need may have been so narrowly crafted as to prejudice alternative selection.

If the goal of achieving the state's environmental objectives are clearly stated in the project's purpose and need early in the project development process, then it is possible to achieve balanced outcomes and avoid costly delays where conflict or inconsistency is identified later in the process. For SB 743 implementation, this means considering improvements in transportation facilities and services that can facilitate access to desired destinations, for both travelers and freight, without inducing VMT through the construction of additional capacity.

Duties and Deliverables:

- Through the blueprint planning and local development review process, District Regional Planning units can engage their external partners on development patterns, land use approvals, and infrastructure plans that conflict with the State's environmental goals.
- District System Planning units can review the conceptual project descriptions contained in Regional Transportation Plans and Caltrans' corridor plans to identify those that are narrowly focused on traditional transportation outcomes and elevate them for rescoping. Multimodal system investments identified by Congestion Management Agencies and Transportation Management Associations or included in parallel planning documents such as Long-Range Transit Development Plans may be helpful for this.
- During Project Initiation Document (PID) phase, all PDT members could encourage the explicit incorporation of multimodal options and environmental outcomes in purpose and need statements and preliminary alternatives.

II. Avoidance and Minimization in Project Alternatives

A project's purpose and need statement sets the stage for development of a reasonable range of alternatives and leads to a more precisely defined scope, cost, and schedule for its delivery. To achieve balanced outcomes, a project's alternatives, design, features, and related components should always include sensitivity to potential environmental effects. When considering environmental outcomes, we should always avoid and minimize potential impacts first before seeking ways to mitigate them. Rather than waiting until the end of the formal environmental process, avoidance and minimization is done most effectively through reiterative conceptual planning during preliminary scoping (i.e. the corridor planning or regional planning process) and alternative development during project initiation (i.e. the PID phase). Even

pursuing early refinements to the original project description during the Project Approval/ Environmental Document (PA/ED) phase may be more efficient than making significant changes or creating additional alternatives later in the process.

If re-scoping a project or developing an entirely new alternative can avoid or minimize environmental effects while achieving the project's balanced purpose and need, then those options should be pursued before considering mitigation. These avoidance and minimization strategies and the process of reiterative refinement of project alternatives should be adequately explored, equally treated, and thoroughly discussed in both technical studies and environmental documents in order to facilitate informed decision-making and full disclosure of potentially significant environmental impacts. We commonly employ these processes for other environmental resources on projects across the state, such as bridge projects where, even later in PA&ED, we choose a design or construction methods to lessen the potential of impacts to aquatic or riparian species. For SB 743 implementation, this could mean explicitly incorporating transit, pricing, and other demand management strategies, off-system first/last mile solutions and mobility services, or other multi-modal design elements that do not inherently induce VMT like traditional highway expansions. It becomes increasingly difficult to pursue this reiterative refinement process the further a project moves through project development and delivery. Therefore, alternatives should be expressly developed from the beginning with avoidance and minimization in mind. Similarly, for projects that may be further into the project development process, it may be prudent to re-evaluate initial alternatives that were considered but withdrawn from further consideration if they may better meet both mobility and environmental objectives rather than just reducing congestion or travel-times.

Duties and Deliverables:

- During early project scoping in the PID phase, District Traffic, Design, and Planning units, as well as project managers could directly engage their partners, such as regional transit operators, local land use authorities, transportation management associations (TMAs), mobility service providers, non-governmental organizations, and others, in order to develop improvement concepts that can enhance mobility without inducing VMT.
    - Reference documents could also include in-fill priority area maps and inner-city passenger rail business plans, the non-roadway elements of regional impact fee programs, or the RTP's "Tier II" list of unfunded multimodal improvements. Active engagement with regional Social Services Transportation Advisory Committees and the Unmet Transit Needs Hearing process is also recommended.
- While working with the PDT, District Environmental units could identify projects that may induced VMT and request the Risk-Register to reflect a potential need for rescoping, new alternatives, and/or the development of long-range mitigation and monitoring measures. Ideally, such projects would not emerge from PID phase without the creation of related Mitigation Cost Compliance Estimates and a realistic plan for implementing likely mitigation measures if re-scoping or avoidance alternatives are not pursued.

III. Full Disclosure and Informed Decision-Making

CEQA requires us to use the best available information and most accurate methodologies available to fully analyze and describe a project's potential effects. For Caltrans, guidance included in the Transportation Analysis Framework (TAF) and _____ provide vetted best practices on assessing induced VMT impacts and on measures that could be employed as mitigation. That said, CEQA does not require absolute certainty about impacts such as VMT where it may not be possible. We must identify unknowns, explain assumptions, and describe technical challenges in order to give decision-makers and the public a complete picture of what the project's outcomes may be. To facilitate full disclosure and informed decision-making, our findings must be described in plain language in order to be both transparent and accessible to decision-makers and the public.

Transparency describes our responsibility to clearly articulate the technical depth and breadth of our evaluations, our justifications for the recommended alternative, and our admission of any limitations or uncertainties that may influence decision makers' approval or rejection of the project. Given statewide environmental goals and the magnitude of Caltrans capital program, this is full disclosure may be particularly important where the cumulative impact of anticipated or even uncertain adverse environmental effects may outweigh projected transportation benefits of individual projects.

Accessibility describes our responsibility to articulate these issues in plain, everyday terms that are easily understandable by decision-makers and the public. When it comes to the assessment of VMT, there will be times where it is not possible to precisely determine potential project outcomes, even when following established guidance. In these cases, we could document known methodological limitations and describe the range of potential effects rather than simply report figures that may be inaccurate or incomplete. Given the evolving science behind VMT inducement and mitigation assessment, this approach could be used to clearly convey the absence of verifiable data while still outlining the likely consequences of project approval in the most transparent way possible. By explaining any such unknowns and describing the minimum and maximum levels of potential effects from the project, we simultaneously address our limitations and facilitate informed decision-making. Given the equally important nature of California's environmental and transportation goals, this approach provides an opportunity for a project's level of environmental risk and transportation return to be factored together when considering its possible approval or rejection.

Duties and Deliverables:

- During PA&ED, District Traffic Forecasting and/or Operations units should follow the instructions in the TAF and TAC, as well as OPR's Technical Advisory. Where specific analytic challenges are not directly addressed by existing guidance, they could explain the range of results provided by available tools and different approaches. Research behind the California Induced Travel Calculator and excerpts from the Travel Demand Model Development Reports could be used to discuss the assumptions in and limitations of the analysis. When estimating potential VMT reductions from various mitigation measures, they could leverage related data-points (e.g. transit ridership forecasts) or empirical observations from comparable contexts (e.g. reports on "single-occupant trips averted" available from Transportation Management Associations).

- Similarly, when crafting related discussions in the environmental document, District Environmental Generalists should not simply copy and paste language from technical reports but should translate their specialists' explanations in terms that the public may find easy understand.

IV. Good Faith Effort and Substantial Evidence

CEQA requires us to demonstrate a good faith effort and use substantial evidence to justify our conclusions. This is particularly true when reasonable questions or concerns have been raised by the public and/or responsible agencies under CEQA's fair-argument standards based on facts or reasonable inferences from facts. Public comments and controversies received during early planning and formal project scoping are another reason why it is important to incorporate environmental considerations at the beginning of the process through purpose and need statements and preliminary alternatives. Delay to Caltrans' self-imposed project delivery milestones is not an allowable excuse under CEQA to avoid performing adequate analysis, pursuing additional alternatives, or ensuring full mitigation of our projects' impacts. Therefore, it is advisable to prepare project schedules and resources to support the reiterative refinement of alternatives based on comments received during early planning, in review of technical studies, and in response to your environmental Notice of Preparation (NOP). This proactive approach is a best-practice for managing potential risks to project budgets and schedules.

In light of the evolving science on VMT evaluation, one of the primary questions that CEQA asks practitioners to answer is if the conclusions resulting from their studies are supported by data and/or the best information available. For example, if concerns are raised about adequate VMT mitigation, we should not simply state that, "*no realistic mitigation strategies could be implemented to counter the project's induced VMT…*", or, "*it is anticipated that available mitigation strategies will fall short of reducing VMT to a less than significant impact…*"; we should demonstrate the good faith effort we undertook to explore all reasonable and feasible mitigation options, to quantify projected VMT reduction from them, and to develop the implementation details needed to carry them out. In essence, we must support our conclusions by demonstrating the due diligence we exercised to fully mitigate our projects' impacts.

In addition to CEQA's requirement that we evaluate concerns that have been substantiated in the project's record, if not adequately addressed, public controversy could result in opposition or even litigation against a project, which would ultimately have schedule and cost implications. For example, a court could remand part of an environmental document for further impact analysis or mitigation assessment. Even though it may delay a project schedule, undertaking reiterative refinement during project development, rather than after circulation of draft environmental document, could save time and reduce risk in the long run.

It is also important to note that, similar to how other environmental commitments are funded, the cost of environmental mitigation is a direct part of the total project cost, not a separate or "external" cost. Therefore, we cannot simply dismiss realistic measures by stating, "*Funding has not been identified for mitigation…*"; just like demonstrating fiscal constraint and securing full funding for the project's construction, supporting the cost of mitigation is a responsibility of the project sponsor as a core cost of the project itself. This is similar to the challenge of programming

additional funds for cost escalations that are attributable to other, more familiar environmental conditions or even permitting requirements that may emerge as late as the Plans, Specifications, and Estimates (PS&E) phase. Where Caltrans is the lead agency, but not the project sponsor (e.g. for locally/regionally funded oversight projects), it is advisable to clearly convey this expectation and planned for it accordingly.

Duties and Deliverables:

- Where significant uncertainty or project risk exists, it may be prudent for Environmental and Project Management units to request early review by Caltrans' legal counsel to identify aspects of the analysis and/or conclusions that could be challenged in court.
- District Planning and Project Management units, as well as Executive leadership and external project sponsors may want to develop long-range funding and phasing plans where the cost of mitigation may be significant or is expected to outstrip available revenues and projected programming capacity. For example, long-range phasing and funding plans are commonly developed for large, expensive projects where full funding is not available to construct the project through a single source or within a single programming cycle. In such cases, Caltrans Project Managers and Executives such as PPM and Planning Deputies or even District Directors may work with their external partners and counterparts at in the Headquarters Division of Financial Programming or the California Transportation Commission to develop a specific programming strategy needed to support the required costs over an extended period of time.

V. An Overview of Significance Determinations

Environmental and transportation planning best practices guide us to develop purpose and need statements, objectives, and alternatives that protect our environmental resources while achieving balanced transportation outcomes. Generally speaking, we are asked to first pursue avoidance and minimization strategies as our alternatives are formulated and refined during project development, then to consider mitigation as a last resort when dealing with potentially significant adverse environmental impacts.

Typically, there are several steps that we take to develop alternatives with minimal environmental impacts. First, we draft a conceptual description of the project, per the reiterative refinement process outlined above. To facilitate mobility without inducing VMT, this could include incorporating design elements, related improvements, or system management strategies that could foster mode-shift away from the single-occupant automobile. Examples could be the creation of pricing or other managed-lane strategies, the provision of multimodal facilities or active transportation design elements, the utilization of transportation demand management techniques, or even the creation of "off-system" partnerships involving transit services and infrastructure as core elements of the project. In this example, such elements would be considered "project features" rather than "mitigation". In essence, these are fundamental aspects of the project, not "add-ons". For VMT analysis, these aspects of the project would all be articulated in the project description and, collectively, serve as the basis for evaluation of the "build-alternative" against the "no-build" alternative under "future-baseline" conditions.

Second, we analyze the amount of VMT potentially induced by the project, including any effects the project may have on future land use patterns. The "with-project" scenario is measured against the "without project" scenario under future-baseline conditions, which accounts for both the development of planned growth and the implementation of planned infrastructure improvements and service enhancements for which full funding is determined to be reasonably available over the project's analysis horizon. It also accounts for background increases in VMT attributable to factors beyond the project's direct influence. We do this initial comparison, including the reiteration of potential land use affects, so that a complete picture of the project's potential effects can be identified, and a preliminary significance determination made before considering possible mitigation measures. Given that the avoidance and minimization measures incorporated are considered part of the project (i.e. project features) rather than strategies used to mitigate its impacts, this assessment identifies additional steps and the level of mitigation that would be required to achieve a less than significant impact. If adequate mitigation can be identified and its implementation can be reasonably assured, then a finding that the project has a less than significant impact could be supported.

As stated in the guidance, "CALTRANS POLICY ON TRANSPORTATION IMPACT ANALYSIS AND CEQA SIGNIFICANCE DETERMINATIONS FOR PROJECTS ON THE STATE HIGHWAY SYSTEM" (https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-vmt-policy-memo-fnl-a11y.pdf), *"the potential for projects to induce additional travel will be the basis for determinations of significance..."* In other words, the amount of VMT induced by a project, after all avoidance and minimization features are incorporated, is the target for our mitigation efforts. If drawling a rough analogy with other types of mitigation, this could be considered somewhat similar to the "success criteria" or "mitigation ratios" needed to reduce a project's impact to a less than significant level.

Duties and Deliverables:

- District Planning, Design, Traffic, and Project Management units could work together to identify, incorporate, and analyzed VMT-reducing strategies as essential features within the project description prior to exploring additional mitigation measures.
- In order to help identify potential mitigation measures, District Regional Planning units could look at the RTP's Tier I improvement list for which full funding is not already "available and committed" (i.e. "additional") or its Tier II lists of un-funded improvements.
- District Environmental units could work with their counterparts in Project Management to ensure that due diligence and a good faith effort have been performed toward full mitigation by requesting documentation demonstrating that all reasonable and realistic measures have been pursued. All PDT members should provide substantial evidence needed to support any conclusions made in their environmental documents.

VI. Mitigation Adequacy and Implementation Assurance

As with other types of environmental analysis, potential VMT impacts must be addressed with mitigation before a final significance determination can be made. When we consider the need for mitigation, we should evaluate which options are reasonable and feasible, and to what

degree they will be effective in reducing VMT. We should also consider how the measures identified will be implemented, monitored, and enforced over time. In essence, for mitigation measures to be considered adequate, they need to be reasonable, feasible, effective, and our commitment to their implementation needs to be assured.

Mitigation measures could include both

Whichever suite of mitigation measures are chosen for your project, substantial evidence will be needed in order to demonstrate that the mitigations are:

A) Specific and realistic proposals that can be implemented and monitored over time.

B) Effective in reducing VMT – that they will drive travel behavior away from longer trips in single-occupant automobiles and toward shorter trips, shared trips, trips made by non-vehicular modes, or will avoid trips altogether.

C) Quantifiable and measurable against a project's impacts.

Similar evidence is also required to support any conclusions that potential mitigation measures have been explored and deemed to be unreasonable, infeasible, or ineffective to bring a project's impact down to a less-than significant level. Presumptive assertions or dismissive claims that lack adequate support are not defensible under CEQA's standards. For example, the claim that, *"required mitigation measures are not within Caltrans' ability to directly implement…"*, dismisses the fact that public and private entities regularly enter into contractual agreements to exchange funds, share implementation costs, and assume delivery responsibilities – all of which could be used to provide adequate assurance of mitigation implementation.

Discussions that delve into these considerations should address context-specific factors, such as the questions and considerations in the following hypothetical examples:

- Are data, empirical evidence, or research-based methodologies available to estimate the mitigations' anticipated results?

- Are multi-modal transfer stations sited to incentivize the usage of transit or inter-city rail that would drive mode-shift?

- If tolling is being proposed as a core project feature and is considered in the project's inducement analyst? Similarly, can the resulting revenue be used to incentivize mode-shift investments or support transit oriented in-fill development that could reduce the demand for long-distance auto-oriented commuting?

- If active transportation improvements are being proposed as mitigation, will they be able to effectively replace trips currently made by automobiles or will they mainly be used for recreational purposes?

Mitigation measures should be adequately described such that they provide a sufficient description of what will be implemented, where it will be implemented, who will implement it, how implementation agreements will be developed, what funding will be programmed to carry it out, what the anticipated results will be, how those results will be measured, and how the mitigation will be monitored for compliance. While lead agencies are allowed to defer certain mitigation details, these essential factors should be described in the project's environmental document and memorialized in its Environmental Commitment Record (ECR) prior to the Final Environmental Document (FED). In essence, we should show our work, demonstrating that we have used robust methods described in Caltrans guidance to assess impacts and have done everything possible to eliminate those impacts. Such a showing is not only consistent with CEQA but is also needed to achieve the balanced outcomes that Caltrans seeks to achieve.

Substantial evidence for these requirements can be based on academic research, expert panels, projections based on demographic, traffic, and ridership data, or they can be based on real-world observations within the region where the mitigation is being proposed. Just like performing inducement analysis, the data and methods used must reflect the potential for mitigations to reduce VMT. When extrapolations or adjustments are made, they should be clearly explained and justified as applicable to the project and its context. When uncertainty exists or when the science or research has not fully matured, or when there is a range of potential results from the mitigations, these should be accounted for and disclosed.

For other environmental resources, we frequently see on-site mitigation that are "biddable and buildable." However, for VMT, mitigation measures may not take place within the project limits or be implemented through the prime construction contract. Further, this level of specificity may not be available at the time of the final environmental document. Therefore, similar to the process for resource permitting, it is possible to provide adequate accountability by outlining the basic details discussed above, describing the project's objective mitigation performance standards, and memorializing those essential commitments in the FED and ECR [Then, before the project can go to construction, you can develop the implementation agreements and details needed on how your team will meet and monitor those performance standards over time.].

These steps should be taken before the FED is circulated in order to demonstrate that all feasible mitigation strategies have been exhausted and there are no further options available before a

Statement of Overriding Consideration is entertained. Please note that CEQA requires substantial evidence to support Statement of Overriding Consideration, including reasons why project impacts are outweighed by the economic, legal, social, technological, or other benefits. If anticipating such statements, it is strongly recommended to confer with your legal counsel and executive leadership at the District and Headquarters.

Duties and Deliverables:

- District Executive leadership could identify responsible parties, internally and externally, and initiate implementation partnerships or coordinated regional approaches.
- Together, District Project Managers and Environmental Units can develop Environmental Compliance Cost Estimates, Environmental Commitment Records, mitigation agreements, contribution agreements, cooperative agreements, third-party contracts, etc. as implementation vehicles to spell out required mitigation details and to provide the enforceability provisions that CEQA requires to call a mitigation reasonably assured.
- District Project Managers can program funding such that long-range mitigation could be adequately maintained, monitored, and administered over time. As full funding for mitigation will be required for it to be considered reasonably assured, fair-share partnerships could be developed for mitigations that may be only partially funded or for which the project may be only partially responsible. As another example, mitigation funds could be programmed and "Child-EAs" could be used to create stand-alone mitigation projects and provide the financial assurance needed to addressed project impacts up-front while the "Parent Project" is phased and funded over time.
- Similar as with other environmental resources, District Environmental units could develop Mitigation Monitoring Plans with regular reporting provisions that could be used to track the measures' status and effectiveness, as well as to make any adjustments needed if they are not performing as originally expected or are not meeting the success criteria established for issuance of a Certificate of Environmental Compliance, which is typically required as project close-out.

Conclusion

The summary of issues shared here touched on environmental considerations in the planning and project development process, provided a concise overview of existing CEQA requirements, and shared recommended actions for Caltrans' various functional units. It is anticipated that various program managers and process-owners will complete more detailed updates to their policies, processes, and procedures over time. In the meantime, the recommended best-practices identified here simply reflect common comments and emerging efforts to address SB 743 implementation with the intended result of projects that better align with statewide transportation and environmental goals.

As Caltrans employees, we do not just build transportation projects; we also protect the environment and our communities. As the ultimate approval authority for projects on the State Highway System, we should demonstrate a good faith effort toward exploring low-impact alternatives and ensuring that our impacts can be effectively mitigated to a less than significant

level. It is up to us to engage our partners, apply innovation, make sure that our environmental, as well as transportation goals are being met simultaneously.