PURPOSE

The Caltrans "Vehicle Miles Traveled-Focused Transportation Impact Study Guide" (TISG), dated May 20, 2020 (see https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743), was prepared to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans’ review of vehicle miles traveled (VMT) impact analysis for land use projects and land use plans. 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.”

The purpose of this Interim LDIGR Safety Review Practitioners Guidance is to provide immediate direction about the safety review while final guidance is being developed.

SCOPE

This interim guidance is intended to apply to proposed land use projects and plans affecting the State Highway System. Specific effects may include but are not limited to adding new automobile, bicycle, or pedestrian trips to state roadways; modifying access to state roadways; or affecting the safety of connections to or travel on state roadways. Local agencies may also use this guidance as a model for review of local facilities. Caltrans traffic safety and planning staff are available to advise local agency staff, project developers, and consultants on the application of this guidance.

This interim guidance does not establish thresholds of significance for determining safety impacts under the California Environmental Quality Act (CEQA). The significance of impacts should be determined with careful judgment on the part of a public agency and based, to the greatest extent possible, on scientific and factual data consistent with Caltrans’ CEQA guidance contained in Caltrans’ Standard Environmental Reference (SER).

**CONDUCTING REVIEW**

**Caltrans Review**

District traffic safety staff will use available data to determine if the proposed project may influence or contribute to locations identified by traffic safety Investigations generated by network screening or initiated by the district. District traffic safety staff are not expected to review local roadways unless requested to do so by the local lead agency.

The lead agency (or its consultant) will review safety-related local planning documents to determine if the proposed project may adversely affect locations identified for traffic safety improvements in these plans or would otherwise interfere with completion of remedial actions or projects identified in these plans. Examples of relevant plans are provided below. The lead agency or its consultant will also identify mitigation for significant, adverse impacts.

This interim guidance does not preclude, prevent, or exempt any other traffic safety review. This review should not include Level of Service (LOS), vehicular delay, or other traffic operations analyses unrelated to safety. If the review identifies potentially significant impacts to safety, evidence must be expressly identified to support and explain the specific safety concern.

In addition, mitigation strategies for these safety impacts should not be capacity-increasing. Other mitigation strategies should not degrade safety or mobility for vulnerable road users.

**Highway Safety Improvement Program Guidelines for LDIGR Reviews**

District traffic safety staff should use Caltrans’ latest “Highway Safety Improvement Program Guidelines” (see https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/highway-safety-improvement-program) to identify safety impacts based on traffic safety Investigations generated by network screening, or initiated by the district, that may be affected by the...
proposed project or plan and should assess safety improvements to mitigate potential conflicts or adverse impacts to potential or programmed remedial measures.

Instructions on conducting an intergovernmental (Type IR) traffic safety review are provided below. Traffic investigation reports (TIRs) for intergovernmental reviews will use Type IR to distinguish the unique requirements for these reviews and the content required for the associated TIR. Type IR investigations should be stand-alone reviews of an identified location or locations as part of an intergovernmental review.

If a prior traffic safety investigation has not been completed for the project site and surrounding area, then a new safety review should be conducted. Locations that have completed traffic safety investigations generated by network screening or initiated by the district may be used to gain insight of needed safety improvements for Type IR investigations, but the documentation should remain separate. If a Type IR investigation has been completed and additional reviews change the proposed safety improvements, a new Type IR investigation should be initiated, and those changes documented. The intergovernmental safety review should be completed within two weeks of receiving the Environmental Impact Report Notice of Preparation. These reviews should largely focus on identifying locations where traffic safety improvements have already been identified or may be identified as part of an intergovernmental safety review of the project study area and should be based on the safety data outlined below.

Assessments should use traffic safety investigations that include, but are not limited to, the following:

- **TASAS Table C—“All” Collisions.** The most recent report should be reviewed to determine locations in the study area with significantly high concentrations of collisions.

- **TASAS Table C—“Wet” Collisions.** The most recent report should be reviewed to determine locations in the study area with significantly high concentrations of wet collisions.
• Monitoring Program Reports. The most recent reports for each monitoring program should be reviewed to determine if any of the identified locations fall within the study area.
  - Type (MW): Wrong-Way Collision Monitoring Program
  - Type (MX): Cross-Over Collision Monitoring Program
  - Type (MR): Run-Off-Road Program
  - Type (MP): Pedestrian Monitoring Program
  - Type (B1 and B2): Bicycle Monitoring Program

• Systemic Review. Safety staff should review available systemic safety plans covering the study area that identify highway safety improvement projects based on both crash experience and crash potential to reduce fatal and serious injury crashes and consider their recommendations when developing comments.

• District-Initiated Traffic Safety Investigations. In addition to investigations initiated by network screening, traffic safety investigators can initiate other traffic safety investigations as needed.

District traffic safety staff should consider each location and the proposed project’s or plan’s potential influence on safety, including but not limited to the following factors:

• Increased presence of pedestrians and bicyclists.
• Degradation of the walking and bicycling environment and experience.
• New pedestrian and bicyclist connection desires.
• Multimodal conflict points, especially at intersections and project access locations.
• Change in traffic mix such as an increase in bicyclists or pedestrians where features such as shoulders or sidewalks may not exist or are inconsistent with facility design (sidewalks, bike and multi-user paths, multimodal roadways, etc.).
• Increased vehicular speeds.
• Transition between free flow and metered flow.
• Increased traffic volumes.
• Queuing at off-ramps resulting in slow or stopped traffic on the mainline or speed differentials between adjacent lanes.

• Queuing exceeding turn pocket length that impedes through-traffic.

District traffic safety staff should also review the site design for access management as it relates to current Caltrans standards and that might increase collisions on a state roadway. Staff should check that site access meets applicable design standards, referencing the Caltrans Highway Design Manual and the National Association of City Transportation Officials bicycle and pedestrian design guides, when applicable. Examples of access management issues include the following:

• Sight distance constraints caused by placement of a driveway.

• Driveway or intersection spacing.

• Queuing onto roadways caused by project access design features such as driveway placement near ramp intersections or missing left turn pockets.

• Multimodal conflict points caused by turning vehicles.

• Pedestrian and bicycle connections from the state roadway to the entrance(s) of the new land use that are incomplete.

In finalizing safety comments and safety improvement recommendations, district traffic safety staff should consider that collisions in vulnerable communities are underreported and have disproportionate collision rates.

District traffic safety staff recommendations will be submitted to the LDIGR contact for the project or plan review to be integrated with the other LDIGR comments. Safety-related comments should classify locations for safety improvements into two types:

1. General, which apply whether the proposed project or plan is implemented or not.

2. Project/plan specific, which will not apply unless the proposed project or plan is implemented.

District traffic safety staff should also identify and report any planned Caltrans improvements that would affect or otherwise modify these locations. Safety input will be integrated into the formal Caltrans LDIGR comments at each step in the CEQA process. The intergovernmental safety review is intended to be
prepared early in the project review process to provide comments to the lead agency on the Environmental Impact Report Notice of Preparation. District traffic safety staff will also be expected to review the published draft environmental document’s safety impact review and provide comments about the adequacy of the safety impact review related to the State Highway System.

This guidance does not replace the Encroachment Permit process or requirements contained in the Caltrans Encroachment Permit Manual or required approval of an Encroachment Permit or Permit Engineering Evaluation Report (PEER) document.

District traffic safety Type IR reviews should be charged to 0000001062 along with the TIR number and 0000001063 along with the TIR number depending on whether the review is on or off the State Highway System.

**Lead Agency Safety Impact Analysis**

The lead agency conducting the CEQA review has the discretion to determine its own methodology for safety impact review. Caltrans recommends that the local review be informed by safety-related plans and programs that may apply to the study area. Several types of local safety-related plans may be applicable, including but not limited to the following:

- Local roadway safety plans.
- Systemic safety review reports.
- Vision-zero plans.
- Active transportation, pedestrian, and bicycle plans.
- Collision monitoring programs.
- General plan or specific plan safety elements.

The lead agency conducting the safety review for the proposed project should address the following safety topics:

- Identify the plans and programs relevant to the proposed project area.
- Identify safety issues (such as a high injury network or presence of systemic crash or typologies in the project area), actions, or projects in the study area affecting the State Highway System as documented in the plans.
- Address any safety comments provided by Caltrans.
• Determine if the proposed land use project would adversely impact safety, safety actions, or safety projects.

• Prioritize vulnerable road users and communities wherever tradeoffs may be required.

**Review Outcomes**

The lead agency conducting its own safety review for the proposed project should determine whether the project’s contribution to the adverse impacts identified through the review outlined above constitutes a significant impact under CEQA. If mitigation is identified, it will necessarily require a nexus to the identified impact and be roughly proportional to that impact. Caltrans will review the proposed project mitigation to determine if the nexus between the project and proposed mitigation is acceptable or the proposed mitigation is proportional to the project impacts. If mitigation is identified, it should avoid increasing roadway vehicle capacity, which may induce VMT or affect conditions for vulnerable users.