

Traffic, Parking and Circulation Assessment for the North Star 2 Project

Imperial County, California

Prepared For:

ZGlobal, Inc.
604 Sutter Street, Suite 250
Folsom, California 95630

Prepared By:

 **ECORP Consulting, Inc.**
ENVIRONMENTAL CONSULTANTS
2525 Warren Drive
Rocklin, California 95677

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LIST OF ACRONYMS AND ABBREVIATIONS

Term	Definition
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
County	Imperial County
CNRA	California Natural Resources Agency
CSHE	Circulation and Scenic Highways Element
GHG	Greenhouse Gas
HCM	Highway Capacity Manual
IVAG	Imperial Valley Association of Governments
LOS	Level of Service
MPO	Metropolitan Planning Organization
OPR	Office of Planning and Research
PRC	Public Resources Code
Project	North Star 2 Project
RCP	Regional Comprehensive Plan
RTAC	Regional Targets Advisory Committee
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SR	State Route
SRTP	Short Range Transit Plan
TAC	Transportation Analysis Under CEQA
VMT	Vehicle Miles Traveled

1.0 INTRODUCTION

This Traffic, Parking and Circulation Assessment describes regulations related to transportation, parking, and circulation, and the existing transportation systems in the Project Vicinity; identifies significance criteria for impacts on transportation, parking, and circulation; and evaluates potential impacts associated with the Project alternatives. Consistency with Imperial County goals and policies is presented in the Regulatory Setting section. Cumulative transportation impacts are presented in the Environmental Consequences and Mitigation Measures section. The Project's effects on thresholds are described in the Significance Criteria section.

2.0 AFFECTED ENVIRONMENT

Several state, regional, and local transportation-related standards and criteria apply to the Project and are discussed in the Regulatory Setting section. Standards and performance targets are identified in the Circulation and Scenic Highways Element (CSHE) of the Imperial County General Plan.

2.1 Regulatory Setting

2.1.1 State

California Senate Bill 375

California's Senate Bill (SB) 375) requires regional Metropolitan Planning Organizations (MPO) to focus regional land use and transportation policies to reduce Greenhouse Gas (GHG) emissions from cars and light trucks in order to meet targets established by the California Air Resources Board with assistance from the Regional Targets Advisory Committee. SB 375 calls for each MPO to develop a Sustainable Communities Strategy (SCS) with its Regional Transportation Plan, identifying the transportation, land use, and housing strategies that will reduce regional GHG emissions.

Department of Transportation

The California Department of Transportation (Caltrans) is responsible for the design, construction, maintenance, and operation of the California State highway system, as well as that portion of the Interstate highway system within the state's boundaries. Alone and in partnership with Amtrak, Caltrans is also involved in the support of intercity passenger rail service in California and is a leader in promoting the use of alternative modes of transportation.

Caltrans has adopted procedures to oversee construction activities on and around its facilities. The Caltrans Construction Manual (Caltrans 2020a) describes best practices for construction activities, including personnel and equipment safety requirements, temporary traffic control, signage, and other requirements aimed at reducing construction-related hazards and constructing projects safely and efficiently. Any work proposed on Caltrans facilities would be required to abide by these requirements.

Office of Planning and Research: Vehicle Miles Traveled Traffic Impacts Under SB 743

Per the December 2018 Technical Advisory on Evaluating Transportation Impacts in the California Environmental Quality Act (CEQA), released by the Office of Planning and Research (OPR): SB 743, which was codified in Public Resources Code (PRC) Section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (California Code of Regulations, Title 14, Div. 6, Ch. 3, Section 15000 et seq.) regarding the analysis of transportation impacts. As one appellate court recently explained:

“During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy...” (Covina Residents for Responsible Development v. City of Covina (2018) 21 Cal.App.5th 712, 729.)

Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Id., subd. (b)(1); see generally, adopted CEQA Guidelines, Section 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CNRA) has certified and adopted, changes to the CEQA Guidelines that identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts. With the CNRA’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by *Level of Service (LOS)* and other similar metrics, no longer constitutes a significant environmental effect under CEQA. (PRC Section 21099, subd. (b)(3).)

Caltrans has also issued its own guidance for implementation of SB 743 for projects that could impact Caltrans facilities. Caltrans issued its Transportation Analysis Framework in September 2020, which details methodology for calculating induced demand for capacity increasing transportation projects on the State Highway System (Caltrans 2020b). Caltrans also issued its Transportation Analysis Under CEQA guidance in September 2020, which describes significance determinations for capacity increasing projects on the State Highway System.

Transportation facilities under the jurisdiction of Caltrans within the vicinity of the Project Site include Highway 78.

Due to the location of the Proposed Project and the nature of the Project being a remotely operated solar farm with minimal structural development that would not include additional full-time employees onsite, VMT impacts are not analyzed further in this document

2.1.2 Local

2.1.2.1 Southern California Association of Governments Plans and Programs

The Southern California Association of Governments (SCAG) is responsible for the regional planning in Southern California, within the SCAG region of counties. SCAG has prepared long range growth and development plans for the Southern California region since the early 1970s as part of the ongoing

Development Guide Program. This program provides a framework for coordinating local and regional decisions regarding future development and growth. An important component of this process is the preparation of growth at intervals ranging from 3 to 5 years. The adopted growth forecast policies become the basis for SCAG’s functional plans (i.e., transportation, housing, air and water) for the region. The population totals and growth distribution are used in planning the future capacity of highways and transit systems.

The Regional Comprehensive Plan (RCP) recommends ways to redirect the region’s growth in order to minimize congestion and better protect the environment. While SCAG has no authority to mandate implementation of its RCP, some of the Plan’s principal goals (i.e., improved jobs/housing balance) are being implemented through county and city general plans.

The Regional Transportation Plan (RTP), Destination 2030, is linked to the RCP. Because SCAG has authority over a significant amount of transportation funding, it also has some control over the implementation of transportation-related projects. The Goods Movement Action Plan seeks to optimize the region’s transportation system through increases in economic efficiency, congestion, mitigation, safety and air quality improvements, and enhancements to system security. The Compass Blueprint 2-percent Strategy provides for studying new directions for growth.

2.1.2.2 Imperial County General Plan Circulation and Scenic Highways Element

The Imperial County General Plan CSHE is intended to provide a plan to accommodate a pattern of concentrated and coordinated growth, providing both, regional and local linkage systems between unique communities, and its neighboring metropolitan regions while protecting and enhancing scenic resources within both rural and urban scenic highway corridors. The Imperial County General Plan CSHE policies related to the proposed Project are outlined below. Table 1 summarizes the proposed Project’s consistency with the applicable General Plan policies.

While this report analyzes the Proposed Project’s consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Imperial County Planning Commissioners and Board of Supervisors ultimately determines consistency with the General Plan.

Table 1. Transportation and Circulation Standards of the Imperial County General Plan CSHE	
Plan/Policy	Standard/Criteria
CSHE Goal 1: The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment.	A qualitative analysis has been prepared which demonstrates that the proposed Project would not cause existing roadways or intersections to operate below a Level of Service "C".
CSHE Objective 1.2: Require a traffic analysis for any new development which may have a significant impact on County roads.	Traffic impacts were concluded to be less than significant. No mitigation is required.

Table 1. Transportation and Circulation Standards of the Imperial County General Plan CSHE	
Plan/Policy	Standard/Criteria
CSHE Objective 1.12: Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on existing roadways and intersection to a level of service (LOS) worse than "C" without providing appropriate mitigations to existing infrastructure.	

2.1.2.3 County of Imperial Bicycle Master Plan

In 1999, the County of Imperial adopted a Bicycle Master Plan for use as a guideline in planning, developing, designing, and constructing future bicycle facilities. This was readopted in 2003. The County Bicycle Master Plan is periodically updated and approved by the County and Imperial Valley Association of Governments (IVAG). The most current approved Bicycle Master Plan is herein made a part of the Circulation Element as an appendix and said plan may be amended from time to time. The latest adopted version will constitute the appendix.

2.1.2.4 Imperial County Airport Land Use Compatibility Plan

The County of Imperial approved an amended Airport Land Use Compatibility Plan for all Imperial County airports in June 1996. The plan sets forth the criteria and policies that the Airport Land Use Commission use to assess the compatibility between the primary airports in the County and proposed land use development in the areas surrounding them. Airports affected by this plan located near El Centro are the Imperial County Airport and the Naval Air Facility at El Centro. Additionally, the Plan provides guidance for commission review of new airports and heliports proposed for construction in the County.

2.1.2.5 2002 Imperial County 20-Year Transportation Plan Update - Highway Element

The 2002 Transportation Plan is a 20-year plan that articulates Imperial County’s transportation challenges. The plan provides the foundation for future transportation funding decisions by establishing a set of transportation priorities for Imperial Valley roads and highways. These priorities are intended to meet and respond to the unique transportation characteristics of Imperial Valley’s residents, visitors, economy and businesses. The basis for addressing the region’s particular needs was based on the mission statement: “Maintain and improve mobility for people and goods to enhance the quality of life and economic vitality of Imperial County.”

2.1.2.6 Imperial County 20-Year Transportation Plan – Non Motorized Transportation Element

An *Imperial County 20-Year Non-Motorized Transportation Plan* was prepared for the IVAG and released in April 2000. The study evaluates existing facilities for pedestrian and bicycles services in Imperial County

and provides long-term recommendations. The plan includes specific recommendations based upon census data. The Non-Motorized Transportation Plan is prepared for the member agencies of the IVAG.

2.1.2.7 Imperial Valley Short Range Transit Plan

The Short Range Transit Plan (SRTP), at the time of this update, was published in 2003 and is an administrative and management tool. The SRTP is a federally mandated planning document that describes the plans, programs and goals of the transit operator. It has a 10-year planning horizon and is updated biennially. It focuses on the characteristics and capital needs of the existing system, and on committed (funded) expansion plans. The various regional County contracted transit services are listed, as well as the cities services. The plan is supported by the County circulation element goals and objectives. The SRTP is prepared for the member agencies of the IVAG.

2.1.2.8 Regional Transportation Plan, "Destination 2030"

The RTP is a multi-modal, long-range planning document prepared by the SCAG, in coordination with federal, state, IVAG, and other regional, sub regional and local agencies in Southern California.

The RTP includes programs and policies for congestion management, transit, bicycles and pedestrians, roadways, and finances. The RTP is prepared every 3 years and reflects the current future horizon based on a 20-year projection of needs.

The RTP's primary use is as a regional long-range plan for federally funded transportation projects. It also serves as a comprehensive, coordinated transportation plan for all governmental jurisdictions within the region.

Each agency responsible for transportation, such as local cities, the County, and Caltrans, has different transportation implementation responsibilities under the RTP. The RTP relies on the plans and policies governing circulation and transportation in each county to identify the region's future multi-modal transportation system.

2.1.2.9 Traffic Study and Report Policy

The *Imperial County Traffic Study and Report Policy* (Imperial County Public Works 2007) identifies standards of significance for appropriate traffic studies for applicable land use types in the region. The basic criteria that will be used to make the determination for providing a complete traffic study as a part of the project review process are listed below. The criteria are not a complete or exhaustive list, but they are intended to define when such a report is to be prepared.

General Criteria

- A. Any project that adds more than 8 percent of the total existing vehicle trips on the adjacent road system at full build-out of the project.

- B. Any project that generated more than 400 daily residential trip ends, 800 commercial or industrial trip ends or 200 peak hour trip ends, as determined by the average trip rates contained in the ITE Trip Generation Informational Report or the Imperial County Local Exceptions.
- C. Any project that has the potential to degrade an existing road section, an existing signalized intersection, or an existing unsignalized intersection to below the existing level of service or to cause it to be lower than a level of service (LOS) "C" during any peak hour, using the HCM Methods of analysis on any individual, existing traffic movement.
- D. Any project, within criteria b. above, which generates more than 10% of its total traffic in the form of truck traffic.
- E. Any project that intensifies the usage of the site above the level currently allowed by zoning codes and requires a GPA; and/or CUP, zone change, variance or other discretionary permit.
- F. Any project that may cause an existing or proposed intersection to meet traffic signal warrants or cause a proposed intersection to be lower than LOS "C".

The Project does not meet any of the General Criteria listed above, so a full traffic study is not required.

3.0 ENVIRONMENTAL SETTING

Existing traffic conditions are the baseline from which potential Project impacts are measured. Existing traffic conditions are presented in terms of the roadway system network, traffic volumes, and current traffic operating conditions.

3.1 Existing Road Network

3.1.1 State Roadways

3.1.1.1 State Route 78 (Ben Hulse Highway)

State Route 78 is classified as a State Highway/Expressway in the Imperial County General Plan CSHE. SR 78 is an east-west route highway traversing approximately 82 miles through Imperial County. The route is a two-lane conventional highway throughout its alignment, although some portions have been upgraded to a four-lane expressway and four-lane conventional highway as a result of recent improvement projects. SR 78 is a two-lane conventional highway within the Project vicinity; the posted speed limit is generally 65 mph.

3.1.1.2 State Route 111 (Highway 111)

Highway 111 is classified as a State Highway/Expressway in the Imperial County General Plan CSHE. Highway 111 is a north-south highway connecting the three largest cities in Imperial County — Calexico, El Centro, and Brawley — and runs from Interstate 10 in Riverside County to the U.S./Mexico border.

Outside the towns of Calipatria and Niland, Highway 111 is constructed as a two-lane undivided north-south roadway, providing one lane of travel per direction; and the posted speed limit is generally 65 mph.

3.1.1.3 State Route 115 (Highway 115)

Highway 115 is classified as a State Highway in the Imperial County General Plan CSHE. Highway 115 is primarily a northerly route serving as an alternate to SRs 86 and 111. For the most part, SR 115 is a two-lane conventional highway, although some short segments are four-lanes with a posted speed limit of 65 mph.

3.1.1.4 Transit, Bicycle and Pedestrian Facilities

Transit, bicycle, and pedestrian facilities are not available in the Project vicinity.

3.1.1.5 Airports

The Holtville Airport, located approximately 8.5 miles south of the Project Site, is the closest airport but is closed indefinitely. The Cliff Hatfield Memorial Airport is located approximately 17 miles northwest of the Project Site and is an operational public airport.

3.2 Existing Traffic Volumes

Existing traffic volumes on Project vicinity roadways were promulgated from the Caltrans Traffic Census Program for roadway segments in the Project vicinity, which include SRs 78, 115, and 111, Green Road, and Glamis (Caltrans 2017). Traffic volumes for the listed roadway segments are provided in Table 2.

SR 78 Roadway Segment	Peak Hour Monthly Average Daily Trips	Annual Average Daily Traffic (AADT)
East Junction 115	3,450	3,150
East Junction 111	10,500	9,400
Green Road	2,200	1,800
Glamis	1,800	1,550

Source: Caltrans Traffic Census Program Traffic Volumes: Annual Average Daily Traffic (AADT) 2017.

3.3 Level of Service Standards

A project’s effect on roadway capacity and LOS does not constitute a significant environmental impact under CEQA. However, a LOS evaluation is required per the County’s guidelines to determine if the project would cause any negative effects on roadway operations. The Imperial County Traffic Study and Report Policy, and the County’s General Plan Circulation and Scenic Highway Element require intersections and roadway segments to maintain a peak-hour LOS of C or better.

3.3.1 Intersection Level of Service Definitions

For this analysis, LOS is based on the *Highway Capacity Manual (HCM)* 6th edition (Transportation Research Board 2016) definitions, included as Table 3 for ease of reference. The HCM methodology assigns an LOS grade to an intersection based on the delay for vehicles at the intersection, ranging from LOS A to F; LOS A signifies very slight delay with no approach phase fully utilized, while LOS F signifies very high delays and congestion, frequent cycle failures, and long queues. For signalized and all-way stop-controlled intersections, the average control delay for all vehicles is assessed; for two-way stop-controlled intersections, the intersection approach with the highest delay is utilized. Table 3 shows the LOS thresholds from the HCM. For signalized intersections, LOS criteria are stated in terms of the average control delay (in seconds) per vehicle for a 15-minute analysis period. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For unsignalized intersections, LOS is determined by the computed or measured control delay. It is defined for each movement through the intersection rather than for the intersection as a whole.

Level of Service (LOS)	Average Control Delay (Signalized) (sec/vehicle)	Average Control Delay (Unsignalized) (sec/vehicle)
A	≤ 10.0	≤ 10.0
B	10.0 to 20.0	10.1 to 15.0
C	20.0 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	≥ 80.1	≥ 50.0

Source: Kittleson & Associates 2022 (Appendix M).

3.3.2 Existing Roadway Segment Operations

The North Star 2 Project site is adjacent to SR 78 between Green Road and Glamis. Peak hour traffic on this segment is 360 vehicles, or approximately one vehicle per minute. The LOS is A for this segment and all nearby intersections. Project-related traffic during construction and operation would not reduce the LOS in the Project Area to unacceptable levels.

3.3.3 Parking Facilities

Onsite parking would be provided for all construction workers for the duration of the construction period. Because the conceptual plans lack sufficient detail of site aisles and parking spaces, the design assessment is limited to a high-level basis. It is expected that there will be sufficient parking for all construction workers.

4.0 ENVIRONMENTAL CONSEQUENCES AND MITIGATION MEASURES

4.1 Significance Criteria

For this analysis, significance criteria are based on the checklist presented in Appendix G of the State CEQA Guidelines; factual information; scientific data; and regulatory standards of Federal, State, and local agencies.

4.2 CEQA Criteria

Based on Appendix G of the State CEQA Guidelines, an alternative would result in a significant impact on transportation and circulation if it would result in:

1. conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?
2. conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
3. substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4. result in inadequate emergency access?

4.3 Methods and Assumptions

The analysis prepared in this section is based on a Traffic Impact Report prepared by Kittelson & Associates (2022, Appendix M) and Caltrans Traffic Census Program (Traffic Volumes: Annual Average Daily Traffic 2017). As discussed above, under SB-743, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS metrics may no longer serve as transportation impact metrics for CEQA impact analyses. However, the County of Imperial Department of Public Works requires transportation analyses to review roadway capacity in terms of LOS to identify deficiencies and required improvements to the circulation system, outside of the CEQA analysis.

During the construction phase of the Project, the relative impact of implementing the Project has been determined by estimating the amount of traffic associated with construction activities within the Study Area and superimposing that traffic onto existing traffic volumes. The traffic volumes associated with regular post-Project activities are anticipated to be approximately equal to or slightly higher than existing traffic volumes due to maintenance of the facility. This increase in volume is unknown and is expected to be relatively minor in comparison to existing conditions; thus, a quantitative analysis of resulting traffic operations under current and cumulative conditions is not recommended. A qualitative analysis is presented below in lieu of a quantitative analysis.

4.4 Trip Generation

4.4.1 Construction

The amount of automobile and truck traffic associated with implementation of the Project alternatives would vary throughout the construction season as different activities occur. To ensure that the magnitude of traffic impacts is not underestimated for this analysis, it assumes the maximum probable concurrent employment on the Project Site and maximum concurrent truck activity. It is estimated there will be a maximum of 300 worker commutes and 10 vendor trips daily to the Project Site during construction.

4.4.1.1 Worker Commutes

It has been assumed for this analysis that each construction worker would drive a personal vehicle to the construction site. In reality, it is likely that some employees within individual trade groups would informally carpool to the job site; as a result, this assumption yields a conservatively high estimate of site trip generation. It has also been assumed that on a given day, 100 percent of the construction employment would arrive at the Project site during the a.m. peak hour, and that 100 percent of the onsite construction employment departs during the p.m. peak hour. In reality, it is likely that some employees would arrive and depart during periods outside of peak commute hours. Thus, this analysis provides a conservatively high estimate of peak-hour construction employee traffic. In total, with a conservative estimate, there is a maximum of 300 worker commutes during construction.

4.4.1.2 Vendor Trips

Trucks would travel to and from the Study Area over the life of the construction phase. The amount of truck activity has been estimated based on a review of the Project design. In a conservative estimate, there is a maximum of 10 daily vendor trips during construction.

4.4.1.3 Regional Trip Distribution

It is necessary to identify the traffic routes that would be used for the Proposed Project, and the regional distribution of Project trips is an element in that process. It is assumed that the relative regional distribution of the Project's employee and construction truck traffic would be similar due to the few state highways in the vicinity of the Project that would funnel both workers and construction goods.

The assumptions made about employee and truck distribution are identified in Table 4. As noted, the primary route for truck traffic would be to the east on SR 78 because this is the main road to the Project Site. Imported materials could come from either direction (e.g., Brawley, Ripley), but would likely approach from the west. Employee traffic would also be heaviest from the west, based on the location of residential areas.

Table 4. Project Trip Distribution			
Direction	Route	Percentage of Total Traffic	
		Trucks	Employees
East	SR 78	10	300
Total:		100	100

Source: Data estimated based on geographic location of commuters and vendors.

Due to the location of the Project site and its associated local roadways, it can be estimated that most or all of the vendor and worker traffic would travel east on SR 78 to the Project site.

4.4.1.4 Staging and Parking

Due to lack of specificity in the Project design, the staging areas during constructed have been estimated for this analysis. The primary staging and parking area is anticipated to be off SR 78 within the Project boundary and remain until the construction period ends.

4.4.2 Operation

Due to the Project being remotely operated and the fact that it will not require full-time onsite employees, it is estimated that operational construction will be minimal and will be approximately the same as current conditions. Similar to the construction analysis, the operation analysis assumes the maximum probable operational trips to the Project site. It is estimated there will be a maximum of four heavy duty trucks daily to the Project Site during operation.

4.4.2.1 Parking Demand

Due to the low number of daily trips to the Project Site during operation, it is anticipated there will be a small parking area for when employees must travel to the Project Site. It is anticipated the operational parking area will be on the same footprint as the construction staging and parking area.

4.4.2.2 Long-term Traffic Volumes

Due to the nature of Project construction being temporary and operational traffic being minimal, long-term increases in traffic would be negligible and a future conditions traffic analysis following construction is not warranted.

4.5 Impacts Not Discussed Further

VMT impacts are not analyzed further in this document due to the location of the Proposed Project and the nature of the Project being a remotely operated solar farm with minimal structural development that would not include additional full-time employees onsite.

4.5.1 Impact Analysis and Mitigation Measures

- IMPACT 1 Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities.** *The Proposed Project would not include any project actions within roadway segments. Additionally, the Proposed Project is not in the vicinity of a Public Transit route, or Bicycle or Pedestrian Facilities. Therefore, the Proposed Project would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, no impact would occur and no mitigation is required.*
- IMPACT 2 Result in a substantial Increase in Traffic Volume (VMT or LOS) – Existing Plus Project by conflicting or being inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).** *There would be no change in traffic volumes associated with Project construction or operation as project construction is temporary and project operation would have no full-time on-site employees. A VMT analysis is not required for this impact. This impact would be less than significant, and no mitigation would be required.*
- IMPACT 3 Result in a substantial increase in roadway or traffic hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?** *The average daily trips during construction and operation would be minimal along the State Highways. There is a potential for truck traffic when approaching the Project site along SR 78. However, these effects would be temporary and minor, and no long-term effects on geometric design features on Project vicinity roadways would occur that could result in an increase in hazards. This impact would be less than significant, and no mitigation would be required.*
- IMPACT 4 Result in inadequate emergency access.** *There is a potential for truck traffic when approaching the Project site along SR 78. However, these effects would be temporary and minor, and no long-term effects on emergency access would occur that could result in an increase in hazards. This impact would be less than significant, and no mitigation would be required.*

5.0 REFERENCES

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