3.10 Transportation/Traffic

This section addresses the project's impacts on traffic and the surrounding roadway network associated with construction and operation of the project. The following discussion describes the existing environmental setting in the surrounding area, the existing federal, state, and local regulations regarding traffic, and an analysis of the potential impacts of the proposed project.

3.10.1 Existing Conditions

The project site is located approximately three miles north of Niland, a census-designated place, in the unincorporated area of Imperial County. The project site is located east of the intersection of Wilkins Road and an unnamed county road. The project footprint (physical area where proposed project components are to be located) is generally located east of Wilkins Road, north of the East Highline Canal, and west of Gas Line Road.

Existing Circulation Network

The following roadway classifications are derived from the County of Imperial General Plan Circulation and Scenic Highways Element (County of Imperial 2008):

Expressway

The main function of this classification is to provide regional and intra-county travel services. Features include high design standards with six travel lanes; wide landscaped medians; highly restricted access; provisions for public transit lands, including but not limited to, bus lanes, train lanes, or other mass transit type means; and no parking. Minimum [right-of-way] [ROW] is 210 feet consisting of three travel lanes per direction, a 56-foot median, and shoulders along both sides of the travel way. The ROW width is exclusive of necessary adjacent easements such as for the IID facilities as these vary. The minimum intersection spacing is 1 mile (ROWs may be greater if the road segment also serves as a corridor for public utilities).

Prime Arterial

The main function of this classification is to provide regional, sub regional, and intra-county travel services. Features include high design standards with four to six travel lanes, raised and landscaped medians, highly restricted access, which in most cases will be a 1 mile minimum, provisions for public transit lanes, including but not limited to bus lanes, train lanes, or other mass transit type means and no parking. The absolute minimum ROW without public transit lanes is 136 feet. ROW dimensions are specified in the standards for specific road segments.

Minor Arterial

These roadways provide intra-county and sub-regional service. Access and parking may be allowed, but closely restricted in such a manner as to ensure proper function of this roadway. Typical standards include the provision for four and six travel lanes with raised landscaped medians for added safety and efficiency by providing protected left turn lanes at selected locations. Some may also contain provisions for public transit lanes or other mass transit type means. Minimum ROW is 102 feet for four lanes and 126 feet for six lanes.

Major Collector (Collector)

These roadways are designed to provide intra-county travel as a link between the long haul facilities and the collector/local facilities. Although it frequently provides direct access to abutting properties, that is not its primary purpose. Typical design features include provision for four travel lanes without a raised median and some may also contain provisions for public transit lanes or other mass transit type means. Minimum ROW is 84 feet. Parking is generally not permitted.

Minor Local Collector (Local Collector)

This is designed to connect local streets with adjacent Collectors or the arterial street system. Design standards include provision for two travel lanes and parking, except in specific locations where parking is removed to provide a turn lane at intersections. Local Collector streets frequently provide direct access to abutting properties, although that should be avoided where feasible. Minimum ROW is 70 feet.

Residential Street

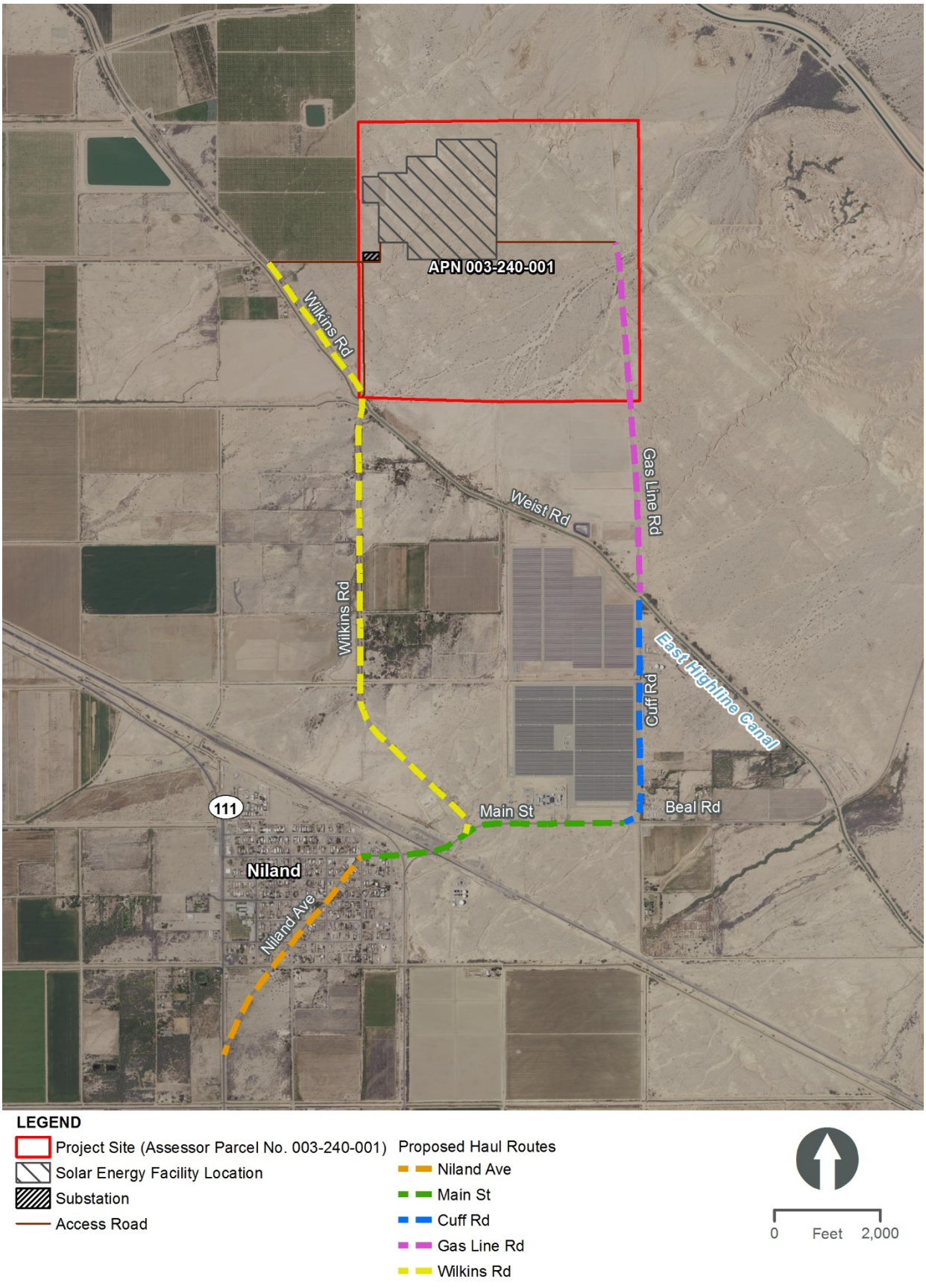
This street type includes residential cul-de-sac and loop streets and is designed to provide direct access to abutting properties and to give access from neighborhoods to the Local Street and Collector Street system. This classification should be discontinuous in alignment, such that through trips are discouraged. Typical design standards include provision for two travel lanes, parking on both sides, and direct driveway access. Minimum ROW is 60 feet.

Project Access Roadways

Following is a brief description of the roadways that would be utilized for access to the project site during construction, and subsequent operation (e.g., maintenance) activities. Figure 3.10-1 depicts the proposed haul routes/construction access to the project site.

- **State Route (SR)-111** (Caltrans-operated highway). SR 111 is maintained by Caltrans and is considered to be in good condition. Because SR 111 is a State operated facility, it is not maintained by the County.
- **Niland Avenue.** Niland Avenue is a paved County road.
- **Main Street.** Main Street is a paved County road.
- **Cuff Road.** Cuff Road is an unpaved County road.
- **Wilkins Road.** Wilkins Road is a paved County road. The portion of Wilkins Road from the southwest corner of the project parcel to the southern end of the existing orchard will only be utilized while improving the project's secondary emergency access road (along southern end of orchard). After improvement of the proposed secondary emergency access road, the project applicant's easement with the land owner specifies this road will only be used for emergency vehicles.
- **Gas Line Road.** Gas Line Road is a dirt service road.

Figure 3.10-1. Proposed Haul Routes



Alternative/Public Transportation

Fixed Route Transportation

Imperial Valley Transit (IVT) is an inter-city fixed route bus system, subsidized by the Imperial Valley Association of Governments (IVAG), administered by the County Department of Public Works and operated by a public transit bus service. The service is wheelchair accessible and Americans with Disabilities Act compliant.

Routes are categorized in the following manner:

- **Fixed Routes.** Fixed routes operate over a set pattern of travel and with a published schedule. The fixed route provides a low cost, reliable, accessible and comfortable way to travel.
- **Deviated Fixed Route.** In several service areas, IVT operates on a deviated fixed route basis so that persons with disabilities and limited mobility are able to travel on the bus. Passengers must call and request this service the day before service is desired in the communities of Seeley, Ocotillo and the east side of the Salton Sea.
- **Remote Zone Routes.** Remote zone route operate once a week. These routes are "lifeline" in nature in that they provide connections from some of the more distant communities in the Imperial County area (IVT 2020).

The project site is not within the Fixed Route Transportation system and, therefore, would not receive regular bus service to the project site or within the vicinity of the project site. The nearest IVT bus stop is on Highway 111 and Main Street in Niland.

Bicycle Facilities

The Highway Design Manual classifies bikeways into three types:

- Class I Bike Path – Provides for bicycle travel on a ROW completely separated from the street
- Class II Bike Lane – Provides a striped lane for one-way travel within the street
- Class III Bike Routes – Provides routes that are signed but not striped

Although none of the roadway segments within proximity of the project site are designated a bikeway classification, the County of Imperial Bicycle Master Plan Update lays out a framework for creating and expanding programs and improvements designed to increase bicycling activity in the County of Imperial. There are no roadways in immediate proximity to the site planned as a bike route.

Daily Street Segment Levels of Service

As previously described, the project site is located in a rural setting with many of these being compacted dirt roads with no congestion. As prescribed in the Circulation and Scenic Highway Element, the intent of the County is to provide a system of roads and streets that operate at a level of service (LOS) C or better (County of Imperial 2008).

3.10.2 Regulatory Setting

This section identifies and summarizes laws, policies, and regulations that are applicable to the project.

State

California Department of Transportation

Caltrans manages more than 50,000 miles of California's highway and freeway lanes, provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Specifically, Caltrans is responsible for the design, construction, maintenance, and operation of the California State Highway System.

As it relates to the proposed project and potential construction access routes, Caltrans is responsible for maintaining and managing SR 111.

Regional

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, the Southern California Association of Governments (SCAG) adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS demonstrates how the region will reduce emissions from transportation sources to comply with SB 375 and meet the NAAQS set forth by the Clean Air Act.

The updated RTP/SCS contains thousands of individual transportation projects that aim to improve the region’s mobility and air quality and revitalize the economy. Since the RTP/SCS’s adoption, the county transportation commissions have identified new project priorities and have experienced technical changes that are time-sensitive. Additionally, the new amendments for the plan have outlined minor modifications to project scopes, costs and/or funding and updates to completion years. The amendments to the RTP/SCS do not change any other policies, programs, or projects in the plan.

Local

County of Imperial Circulation and Scenic Highways Element

The Circulation and Scenic Highways Element identifies the location and extent of transportation routes and facilities. It is intended to meet the transportation needs of local residents and businesses and as a source for regional coordination. The inclusion of Scenic Highways provides a means of protecting and enhancing scenic resources within highway corridors in Imperial County. The purpose of the Circulation and Scenic Highways Element is to provide a comprehensive document which contains the latest knowledge about the transportation needs of the County and the various modes available to meet these needs. Additionally, the purpose of this Element is to provide a means of protecting and enhancing scenic resources within both rural and urban scenic highway corridors.

Coordination across jurisdictional standards for road classification and design standards was identified as a crucial component to the 2008 update of the Circulation and Scenic Highways Element. The intent

of this element is to provide a system of roads and streets that operate at a LOS “C” or better (County of Imperial 2008).

Level of Service

LOS is a professional industry standard by which the operating conditions of a given roadway segment or intersection are measured. LOS ranges from A through F, where LOS A represents the best operating conditions and LOS F represents the worst operating conditions. LOS A facilities are characterized as having free flowing traffic conditions with no restrictions on maneuvering or operating speeds; traffic volumes are low and travel speeds are high. LOS F facilities are characterized as having forced flow with many stoppages and low operating needs. Additionally, with the growth of Imperial County, transportation management and systems management will be necessary to preserve and increase roadway “capacity.” LOS standards are used to assess the performance of a street or highway system and the capacity of a roadway.

County of Imperial Bicycle Master Plan Update: Final Plan

In 2012, the County of Imperial adopted an updated Bicycle Master Plan to serve as the guiding document for the development of an integrated network of bicycle facilities and supporting programs designed to link the unincorporated areas and attractive land uses throughout the County. This document is an update to the previously adopted Countywide Bicycle Master Plan; and was prepared to accomplish the following goals:

1. To promote bicycling as a viable travel choice for users of all abilities in the County
2. To provide a safe and comprehensive regional connected bikeway network
3. To enhance environmental quality, public health, recreation and mobility benefits for the County through increased bicycling

The County of Imperial's General Plan, Circulation and Scenic Highways Element, and Conservation and Open Space Element, provide a solid planning basis for the Bicycle Master Plan. In spite of the fact that there are a limited number of bicycle facilities in Imperial County and no comprehensive bicycle system, there is a growing interest in cycling and numerous cyclists bike on a regular basis for both recreation and commuting to work and school.

3.10.3 Impacts and Mitigation Measures

Thresholds of Significance

Based on CEQA Guidelines Appendix G, project impacts related to transportation and traffic are considered significant if any of the following occur:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities
- Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
- Result in inadequate emergency access

County of Imperial

The County of Imperial does not have published significance criteria for traffic impacts. However, the Circulation and Scenic Highways Element of the County General Plan does state that the LOS goal for intersections and roadway segments is to operate at LOS C or better. Therefore, if an intersection or segment degrades from LOS C or better to LOS D or worse with the addition of project traffic, the impact is considered significant. If the location operates at LOS D or worse with and without project traffic, the impact is considered significant if the project causes the intersection delta to increase by more than 2 seconds, or the volume to capacity (V/C) ratio to increase by more than 0.02. V/C ratios provide a quantitative description of traffic conditions for signalized intersections. These amounts are consistent with those used in the County of Imperial in numerous traffic studies.

California Department of Transportation

A project is considered to have a significant impact on Caltrans facilities if the new project traffic has decreased the operations of surrounding roadways by a defined threshold. If the project exceeds the thresholds addressed in Table 3.10-1, then the project may be considered to have a significant project impact. A feasible mitigation measure will need to be identified to return the impact within the thresholds (pre-project + allowable increase) or the impact will be considered significant and unmitigated when affecting any state highway facilities. As stated previously, Caltrans is responsible for maintaining and managing SR 111.

Table 3.10-1. Level of Service Thresholds for Unsignalized Intersections

LOS	Average Control Delay Per Vehicle (Seconds/Vehicle)	Expected Delay to Minor Street Traffic
A	0.0 ≤ 10.0	Little or no delay
B	10.1 to 15.0	Short traffic delays
C	15.1 to 25.0	Average traffic delays
D	25.1 to 35.0	Long traffic delays
E	35.1 to 50.0	Very long traffic delays
F	≥ 50.0	Severe congestion

Source: Transportation Resource Board 2010
LOS – level of service

Methodology

The assessment evaluates the potential for the project, as described in Chapter 2, Project Description, to assess the project trip generation created during and after construction, and roadway conditions for roads that would be utilized to access the project site for construction.

Project Trip Generation

Project trip generation for both the construction and operational scenarios will be very minimal. The project will generate the most traffic during construction. The construction vehicle mix for both on-road and off-road equipment, by each phase of construction, is presented in Table 6 of the *Air Quality Technical* Study prepared for the project (Appendix D of this EIR).

Table 3.10-2 provides the estimated average daily on-road project trip generation (i.e., trips to and from the site) for the construction phases of the project. As shown, the maximum number of on-road trips during construction would be approximately 80 trips (50 worker trips and 30 truck trips).

The proposed project requires minimal operations and maintenance activities and would not require presence of full-time employees. However, it is conservatively assumed that for day-to-day inspection and minor maintenance, some employees would commute to the project site. The annual operations are assumed to be as follows:

- For site inspection and minor repairs, up to 4 one-way worker trips per day would be generated.
- Routine maintenance activities would include panel washing, which is expected to occur four times annually over a total of 20 days. Panel washing activities are estimated to require additional daily trips of 4 work 6 haul trucks for transport of water during each event.

This estimated project trip generation is below the County's threshold requirement for preparation of a formal traffic impact analysis as the trips would be so minimal that they would not affect roadway or intersection levels of service for any of the roadways that would be utilized for access to and from the project site. Based on the 20 MW size of the project and relatively small acreage, the construction workforce will be limited. Because of the minimal trips estimated, the Department of Public Works has not required a detailed traffic study for this project pursuant to the Imperial County Congestion Management Program (CMP).

Table 3.10-2. Project Trip Generation

Construction Phase (Duration)	Daily Vehicle Trips	
	Workers	Trucks
Site Preparation (30 working days)	30	25
Facility Installation (110 working days)	50	30
Gen-Tie, Site Restoration (20 working days)	20	20

Source: Appendix D of this EIR

Impact Analysis – Solar Energy Facility and Gen-Tie Line

Impact 3.10-1 Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

During the construction phase of the project, the maximum number of trips generated on a daily basis would be approximately 80 trips. This trip count is so low that it does not require a formal traffic analysis as it does not have the potential to impact LOS of roadway segments and intersections. There is no regular bus service to the general area and project-related construction and operations and maintenance phases would not impact mass transit. Future operations and maintenance would be conducted remotely, with minimal trips to the project site for panel washing and other solar maintenance. The proposed project would not interfere with bicycle facilities because the project is

located in a rural portion of the County with no existing or potential future designated bike routes in the area.

Implementation of the proposed project would not require any public road widening to accommodate vehicular trips associated with the project (construction phase and operational phase), while maintaining adequate level of service. Impacts on this issue area are considered less than significant.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-2 Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

This threshold becomes mandatory for projects in which the Draft EIR is released for public review after July 1, 2020. As such, this threshold is not evaluated in this EIR. The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and no impact would occur.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-3 Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

To accommodate emergency access, PV panels would be spaced to maintain proper clearance. A 20-foot wide access road would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. The internal access road would be graded and compacted native soils as required for construction, operations, maintenance, and emergency vehicle access.

During construction, access to the project site for construction vehicles would utilize the following roads:

- SR 111 (Caltrans-operated highways)
- Niland Avenue
- Main Street
- Cuff Road
- Wilkins Road
- Gas Line Road

At the time of final design for the project, and as a Condition of Approval of the project, the applicant will submit a final Haul Route Study that identifies what road improvements, in any, are requested by Department of Public Works and a cost estimate. The applicant would work with Department of Public Works to address the appropriate improvements and Applicant's responsibility for the cost of improvements, if required. The haul route study would include the following components:

1. Pictures and/or other documents to verify the existing conditions of the roads proposed to be utilized for haul routes
2. The haul route study shall evaluate the impact to Wilkins Road and provide recommendations on improvements, as well as quantity and cost estimates for such improvements

The County Department of Public Works will require a Roadway Maintenance Agreement, and that the Application provide financial security to maintain the road on the approved haul route study during construction. The Applicant would be responsible to repair any damages caused by construction traffic during construction and maintain them in safe conditions. The use of the proposed access roads are not otherwise anticipated to increase hazards because of design features or incompatible uses and no significant impact is identified.

Mitigation Measure(s)

No mitigation measures are required.

Impact 3.10-4 Would the project result in inadequate emergency access?

To accommodate emergency access, PV panels would be spaced to maintain proper clearance. A 20-foot wide access road would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. The internal access road would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access. The access and service roads would also have turnaround areas at any dead-end to allow clearance for fire trucks per fire department standards (70 feet by 70 feet and 20-foot-wide access road). The width in-between solar arrays shall be a minimum of 9 feet. The width between solar arrays shall not be less than 10 feet. Based on this context, impacts on this issue area are considered less than significant.

Mitigation Measure(s)

No mitigation measures are required.

Impact Analysis – Fiberoptic Cable

The proposed project includes the installation of approximately two miles of fiber optic cable to connect the proposed substation to the existing Niland Substation. The installation process involves aerial stringing of the fiber optic cable between existing transmission poles. No new transmission structures would be required to install the fiberoptic cable. The installation of the fiberoptic cable would not require a substantial number of heavy construction equipment or vehicle trips. Average daily traffic would be less than the average daily traffic required for construction of the solar energy facility and gen-tie line. Based on these considerations, the fiberoptic cable would not result in a significant impact related to possible safety hazards, or possible conflicts with adopted policies, plans, or programs. A less than significant impact is identified and no mitigation is required.

3.10.4 Decommissioning/Restoration and Residual Impacts

Decommissioning/Restoration

This section included an analysis of construction traffic for the proposed project. As presented above, construction traffic would not result in a significant impact on any of the project area roadway segments or intersections because of the low volume of traffic. A similar scenario would occur during the decommissioning and site restoration stage for the project. Average daily traffic would be similar to or less than the average daily traffic required for construction. Similarly, the decommissioning activities would not result in a significant impact related to possible safety hazards, or possible conflicts with adopted policies, plans, or programs as the decommissioning and subsequent restoration would revert the project site to the existing condition. Therefore, decommissioning and restoration of the project site would not generate traffic resulting in a significant impact on the circulation network. A less than significant impact is identified and no mitigation is required.

Residual

The construction and operation of the proposed project would not result in direct impacts on intersections, roadway segments, and freeway segments. Therefore, less than significant impacts have been identified. No mitigation is required and no residual unmitigated impacts would occur with implementation of the project.

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