

## 3.15 Transportation

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. Information in this section is summarized from the *Traffic Technical Report* prepared by Catalyst Environmental Solutions. This report is included in Appendix L of this EIR.

### 3.15.1 Existing Conditions

As described in the Imperial County Circulation and Scenic Highways Element and the Imperial County Long Range Transportation Plan, the regional roadway network consists of one interstate route (I-8), seven State Routes (SR-7, SR-78, SR-86, SR-98, SR-111, SR-115, and SR-186), and several regionally significant arterials. Additionally, three international Ports of Entry (POEs) between the United States and Mexico are within the Imperial County limits: Calexico, Calexico East, and Andrade (Appendix L of this EIR).

#### Freeways

Freeways are controlled-access, high-speed roadways with grade-separated interchanges. They are intended to carry high volumes of traffic from region to region. The following freeways provide regional access to the project area:

- **Interstate 8 (I-8)** is the primary east-west route through Imperial County and runs for 172 miles from San Diego, California, to Yuma, Arizona. With two travel lanes, it spans 79 miles within Imperial County. From the west it connects to the western end of SR-98. In Imperial County, it intersects with SR-86, SR-111 (access to the international POE at Calexico), SR-7, and SR-115 and then reconnects to SR-98 at its eastern end. It also accesses the SR-186 connection to the Andrade POE. It serves regional, cross-border, and interstate traffic and provides access to desert recreational areas.

#### Major Highways

- **State Highway 98 (SR-98)** is a 56.9-mile east-west route that is entirely contained within Imperial County. It traverses the southern portion of Imperial Valley parallel to I-8 and the U.S./Mexico International Border. It begins at I-8 near Ocotillo, intersects SR-111 and SR-7, and terminates at I-8 near Midway Well. It is mostly two lanes with the exception of having four lanes through portions of the City of Calexico. It serves as an alternate route to I-8, providing access to many agricultural areas in the eastern part of the region, and is used for cross-border traffic.
- **State Highway 78 (SR-78)** is an 81.8-mile east-west route that crosses Imperial County from the San Diego County line to the north junction of SR-86, where it then merges and becomes SR-86 for 24 miles, and then becomes SR-78 again to the Riverside County line. It is typically a two-lane conventional highway except for where it is co-designated SR-86, where it was upgraded to a four-lane expressway or four-lane conventional highway.
- **State Highway 86 (SR-86)** is a 90.8-mile north-south route serving Imperial and Riverside counties. It begins at SR-111 near the U.S./Mexico International Border and extends northward

(roughly parallel to SR-111) along the western shore of the Salton Sea, where it ends at Avenue 46 in the City of Indio. It is a two-lane road in Imperial County and ends at the Riverside County line as a four-lane expressway. It intersects several State routes, including I-8 and SR-78 (where it shares the 24-mile alignment) and continues north to cross the Imperial County/Riverside County line, intersecting SR-195 and SR-111.

- **State Highway 111 (SR-111)** runs north from the downtown Calexico POE for 64 miles except for a 1.2-mile break within Brawley, where it shares an alignment with SR-78. From the Calexico POE to SR-98, it functions primarily as a city street and provides access to many local businesses.
- **State Highway 7 (SR-7)** is a 6.7-mile north-south route from the Calexico East POE to I-8. It is a four-lane highway with access control at the Calexico East POE, SR-98, and direct access to I-8 for the movement of international commercial goods.
- **State Highway 115 (SR-115)** is a 33.6-mile north-south route that begins at the junction with I-8 east of Holtville and ends at the junction with SR-111 in Calipatria. It includes a segment that shares alignment with SR-78, and it is typically a two-lane conventional highway with some short four-lane segments. It serves as an alternate route to SR-86 and SR-111 and is important in facilitating the movement of interregional agricultural goods and intraregional travel between various cities within the County.

## Regional Arterials

The regional roadway system features several important arterials that generally run in either an east-west or north-south orientation. The important north-south arterials (listed from west to east) include Forrester Road, Austin Road, Imperial Avenue, and Dogwood Road. The important east-west arterials in the project area (listed from south to north) include Jasper Road, Heber Road, McCabe Road, and Ross Road.

## Existing Traffic Volumes

Imperial County establishes Level of Service (LOS) standards to assess the performance of a street or highway system and the capacity of a roadway. 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.

Table 3.15-1 summarizes the existing Annual Average Daily Trips (ADT) for road segments in the vicinity of the project. Imperial County targets LOS C as the minimum acceptable level of service (Imperial County 2008). As shown in Table 3.15-1, Dogwood Road from SR-86 to SR-98 exceeds this guideline, and is currently operating at LOS D.



**Table 3.15-1. Existing Road Conditions**

Segment	Direction	Limits	Capacity at LOS C <sup>1</sup>	ADT <sup>2</sup>	LOS
I-8	E-W	From Forrester Rd. to SR-111	60,000	35,000	B
SR-86	E-W	From Dogwood Rd. to SR-111	44,600	4,200	A
SR-98	E-W	From Dogwood Rd. to SR-111	7,100	21,800	F
SR-111	N-S	From I-8 to Northern Calexico City Limits	40,000	34,500	C
McCabe Rd.	E-W	From SR-86 to Dogwood Rd.	7,100	4,146	C
McCabe Rd.	E-W	From Dogwood Rd. to SR-111	7,100	2,607	B
Jasper Rd.	E-W	From SR-111 to Bowker Rd.	7,100	495	A
Forrester Rd.	N-S	From I-8 to McCabe Rd.	7,100	1,366	A
Austin Rd.	N-S	From I-8 to McCabe Rd.	7,100	1,408	A
Dogwood Rd.	N-S	From SR-86 to SR-98	7,100	8,360	D

Source: Appendix L of this EIR

Notes:

1 - Capacity based on Table 5 (Imperial County Standard Street Classification Average Daily Vehicle Trips) from Imperial County's General Plan Circulation and Scenic Highways Element (Imperial County 2008)

2- Regional highway volumes on Caltrans facilities were obtained from Caltrans Traffic Census Program (Caltrans 2022). Regional arterial volumes on Imperial County facilities were obtained from Imperial County (2022).

### Transit Network

Imperial Valley Transit (IVT) is an inter-city fixed route bus system, subsidized by the Imperial Valley Association of Governments, 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. IVT Routes are defined 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 2023).

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 located at the Imperial Valley Mall, which is approximately four miles north of the project site.

## Bicycle Facilities

None of the roadway segments within the vicinity of the project site are designated as bicycle facilities.. However, Dogwood Road is proposed as a Class I multi-use path in the Imperial County Regional Active Transportation Plan (Imperial County Transportation Commission 2022). Class I multi-use paths (frequently referred to as “bicycle paths”) are physically separated from motor vehicle travel routes, with exclusive rights-of-way for non-motorized users like bicyclists and pedestrians.

### 3.15.2 Regulatory Setting

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

#### State

##### *California Department of Transportation*

The State of California Department of Transportation (Caltrans) has responsibility over the design, construction, maintenance, and operation of the California State Highway System. Caltrans has jurisdiction over State highway right-of-way and sets maximum load limits for trucks and safety requirements for oversized vehicles that operate on highways. The project does not include any components which would encroach into Caltrans jurisdiction.

##### *Senate Bill 743*

In September 2013, the Governor’s Office signed Senate Bill 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Within the State’s CEQA Guidelines, these changes include the elimination of Auto Delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies vehicle miles traveled (VMT) as the most appropriate CEQA transportation metric, along with the elimination of Auto Delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions.

#### Regional

##### *SCAG 2020-2045 RTP/SCS (Connect SoCal)*

On September 3, 2020, SCAG adopted the 2020–2045 RTP/SCS (SCAG 2020). 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 2020-2045 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 that 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 an LOS “C” or better (County of Imperial 2008).

### 3.15.3 Impacts and Mitigation Measures

This section presents the significance criteria used for considering project impacts related to transportation, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

#### Thresholds of Significance

Based on CEQA Guidelines Appendix G, project impacts related to transportation 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

#### Methodology

The assessment evaluates the proposed project’s trip generation during and after construction, and roadway conditions for roads that would be utilized to access the project site for construction.

#### *Project Trip Generation*

#### **CONSTRUCTION**

The project is anticipated to take 16 to 24 months to install, test, and become fully operational. Project construction activities will require workers to arrive and depart the project site daily. Additionally, some heavy-truck traffic will occur to deliver and remove equipment and materials to/from the site. Apart

from the direct construction traffic described above, some ancillary trips would also occur related to non-heavy truck deliveries, construction management staff, periodic inspections, etc.

Typically, each worker would be expected to arrive and depart the site at least once, resulting in a daily trip rate of two vehicle trips per worker per day for all 15 workers. Given the site's close proximity to Heber, some workers could be expected to leave and return to the site once per day on breaks. Conservatively assuming 50 percent of workers left and returned once per day (e.g., for lunch), this would result in a daily trip rate of four vehicle trips per worker per day for 8 workers.

Vendor and haul trips consist of heavy vehicle trips to the site includes delivery of construction equipment and materials, as well as transport of equipment and other materials to be removed from the site. Heavy-vehicle trips would not be expected to occur uniformly over the course of the construction period, but rather on occasion as delivery and removal of equipment/materials is required. For the purposes of this temporary construction traffic generation evaluation, 40 daily vendor truck trips and 10 haul trips were conservatively assumed to occur in conjunction with the estimated construction worker load of 15 workers. The daily distribution of truck trips over the course of the 12-hour workday is also expected to be variable; for this analysis, a conservative estimate of 20 percent of daily trips was assumed to occur during both the AM and PM commuter peak hours. As trucks are larger and heavier than passenger cars, the reduced acceleration, braking, and handling characteristics, a Passenger Car Equivalent (PCE) factor of 2.5 is applied to each truck trip to account for the effects of these heavy vehicles within the traffic stream on flat terrain (per the HCM methodology).

The project's construction trip generation is summarized in Table 3.15-2. Accordingly, the total number of vehicle trips generated by project construction is conservatively estimated at 171 PCE trips per day, with 91 total trips during the AM peak hour and 91 total trips during the PM peak hour.

**Table 3.15-2. Construction Trip Generation**

Trip Type	Quantity	Maximum Daily Volumes (ADT)			AM Peak Hour			PM Peak Hour		
		Rate	PCE	Volume	In	Out	Total	In	Out	Total
Workers	15 workers	3/worker	1.0	46	46	0	46	0	46	46
Vendor	20 vehicles	2/vehicle	2.5	100	10	10	20	10	10	20
Haul	5 vehicles	2/vehicle	2.5	25	12.5	12.5	25	12.5	12.5	25
<b>Total</b>				<b>171</b>	<b>68.5</b>	<b>22.5</b>	<b>91</b>	<b>22.5</b>	<b>68.5</b>	<b>91</b>

Source: Appendix L of this EIR

**OPERATION**

Once the proposed project is complete, the site will be staffed with 1-2 onsite employees. The daily trip rates used for determining the project's operations worker trip generation are based on the 10th Edition of ITE Trip Generation manual for General Light Industrial workers. Deliveries of materials required for operations to the site would be vary and would be sporadic throughout the work week. However, for a conservative analysis, it is assumed that one delivery of materials per day will be supplied to the project site (i.e., one vendor truck per day). These vendor trips would generally not occur during peak hours but are considered as such herein for a conservative analysis. Table 3.15-3 provides the estimated average daily on-road project trip generation (i.e., trips to and from the site) for operation of the proposed project.



**Table 3.15-3. Operation Trip Generation**

Trip Type	Quantity	Maximum Daily Volumes (ADT)			AM Peak Hour			PM Peak Hour		
		Rate	PCE	Volume	In	Out	Total	In	Out	Total
Workers	2 workers	3.05/worker	1.0	6	6	0	6	0	6	6
Vendor	1 vehicle	2/vehicle	2.5	5	2.5	2.5	5	2.5	2.5	5
<b>Total</b>				<b>11</b>	<b>8.5</b>	<b>2.5</b>	<b>11</b>	<b>2.5</b>	<b>8.5</b>	<b>11</b>

Source: Appendix L of this EIR

### VMT

The County has not adopted its own VMT thresholds, for this reason the OPR’s Technical Advisory on Evaluating Transportation Impacts on CEQA (December 2018) was used to evaluate VMT impacts. OPR’s Technical Advisory provides guidance for lead agencies to evaluate transportation impacts from projects based on VMT metrics. It provides screening criteria, which can be used to quickly identify whether a project should be expected to cause a less-than-significant impact related to VMT. Per OPR’s Technical Advisory, projects may be screened out as follows:

- Small Projects: projects generate fewer than 110 trips per day,
- Local Serving Retail (generally less than 50,000 square feet in building area),
- Location-Based (low VMT areas, within ½ mile of an existing major transit stop, or along a high-quality transit corridor), and
- Provision of affordable housing.

### Impact Analysis

**Impact 3.15-1 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 proposed project, the maximum number of trip ends generated on a daily basis would be approximately PCE 171 trips. Based on the low amount of construction trips generated and low existing traffic volumes on area roadways, no substantial transportation impacts are anticipated. Implementation of the proposed project would not require any public road widening to accommodate vehicular trips associated with the proposed project (construction phase and operational phase). Once the proposed project is complete, the site will be staffed with 1-2 onsite employees. During operations, the proposed project would generate 11 trips per day.

There is no regular bus service to the general area and project-related construction and operations and maintenance phases would not impact mass transit. The proposed project would not interfere with bicycle facilities because the proposed project is located in a rural portion of the County with no existing designated bike routes in the immediate vicinity. Therefore, the proposed project would not result in any significant impacts to any roadway segments or transportation related facilities/infrastructure within the project area during construction and operation; and would not conflict with a program plan, ordinance, or policy as it relates to traffic and transportation. Impacts are considered less than significant.

*Mitigation Measure(s)*

No mitigation measures are required.

**Impact 3.15-2 Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

Construction of the proposed project would result in nominal and short-term increases in vehicle trips by construction workers and construction vehicles on area roadways. These trips would include construction workers commuting to and from the project site, haul truck trips associated with the transfer and disposal of materials, and material and equipment deliveries. The number of construction-related trips would vary each day, depending on construction phase, planned activity, and material needs. Table 3.15-4 summarizes the maximum estimated project daily VMT for construction and operations.

**Table 3.15-4. Maximum Project Daily VMT**

Trip Type	Number of One-Way Trips	One-Way Trip Length (miles) <sup>2</sup>	Daily VMT (miles)
Workers <sup>1</sup>	46	10.2	469
Vendor	40	225	9,000
Haul	2	20	40
<b>Temporary Construction Maximum Total Daily VMT</b>			<b>9,509</b>
Workers <sup>1</sup>	6	10.2	61.2
Vendor	2	11.9	23.8
Haul <sup>3</sup>	0	20	0
<b>Operations Total Daily VMT</b>			<b>85</b>

Source: Appendix L of this EIR

Notes:

1. The daily trip rates used for determining the project's construction and operation worker trip generation are based on the 10th Edition of ITE Trip Generation manual for General Light Industrial workers. A maximum of 15 construction workers are assumed and 2 operational workers for this conservative estimate.
2. Trip lengths consist of default CalEEMod values with exception of vendors for delivery of project equipment during construction, with deliveries of solar panels, geothermal equipment, etc. assumed to originate at Port of Long Beach, approximately 225 miles from the project site.
3. All truck trips are assigned to vendor deliveries.

OPR's Technical Advisory on Evaluating Transportation Impacts on CEQA (December 2018) recommends the use of VMT metrics when analyzing land use projects and plans. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact. Per CEQA Guidelines, §15064.3 subdivision (a), 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks and is not applied for heavy-duty trucks. Accordingly, construction of the project would generate 46 on-road passenger vehicle trips and operations would result in 6 daily passenger vehicle trips which is much fewer than the screening threshold for small projects of 110 on-road passenger vehicle trips. Therefore, the proposed project



would not conflict or be inconsistent with Section 15064.3(b) of the CEQA Guidelines and this impact is considered less than significant.

*Mitigation Measure(s)*

No mitigation measures are required.

***Impact 3.15-3 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)?***

The proposed project would not result in any changes to any roads, intersections, streets, highways, nor would it provide any incompatible uses to the street and highway system. All vehicles that would be used for travel to and from the project site would be licensed and comply with all appropriate transportation laws and regulations including obtaining and adhering to provisions of any required permits for oversized loads. As such, no impact related to transportation design hazards would occur.

*Mitigation Measure(s)*

No mitigation measures are required.

***Impact 3.15-4 Would the project result in inadequate emergency access?***

All proposed facilities would be constructed within the property boundaries of the project site and would not affect emergency vehicle access to the facility or any roadway. Emergency vehicle access is identified and designated at the Dogwood site, and these areas would not be changed as result of the proposed project.

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, if 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 impacts 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, which would include a requirement that the Applicant provide financial security to maintain the road(s) to be utilized during construction as identified on the approved haul route study. The Applicant would be responsible to repair any damages caused by construction traffic during construction and maintain the applicable road(s) in a safe condition. The use of the proposed access roads is 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.

### 3.15.4 Decommissioning/Restoration and Residual Impacts

#### Decommissioning/Restoration

As presented above, construction traffic would not result in a significant impact on any of the 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 proposed project. ADT would be similar to or less than the ADT 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 pre-project conditions. 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.