3.13 Transportation

This section addresses the potential impacts on traffic and the surrounding roadway network associated with construction and operation of the proposed VEGA 6 project and Ramon Substation expansion. The following discussion describes the existing conditions in the surrounding area, the existing federal, state, and local regulations regarding transportation, and an analysis of the potential impacts of the proposed VEGA 6 project and Ramon Substation expansion. Information contained in this section for the VEGA 6 project is summarized from the *VEGA SES 6 Solar Energy Storage Project Traffic Impact Study* prepared by KOA. This report is included in Appendix J of this EIR. The information provided in this section for the Ramon Substation expansion is summarized from review of publicly available data including the Riverside County General Plan and County of Riverside Transportation Analysis Guidelines.

3.13.1 Existing Conditions

VEGA 6

Existing Circulation Network

The following is a description of the nearby roadway network:

State Route (SR) 78/86 south of Westmorland is a four-lane divided highway. It has recently been widened to provide two lanes in each direction with left turn bays provided. Within the City of Westmorland, the route transitions to a four-lane roadway (named Main Street) with a center two-way left turn lane provided. The intersection of Main Street and Center Street is signalized. West of Martin Road, SR 78/86 transitions back to a four-lane divided highway.

Center Street is a two-lane street in the City of Westmorland. Diagonal parking is provided on the two blocks south of Main Street. Outside the City, this roadway is Forrester Road a two-lane rural county highway.

Baughman Road/Martin Road are two lane roads that are partly in the County and partly in the City of Westmorland. These roads are paved, and they are used by heavy vehicles and other vehicles connecting between SR 78/86 and Forrester Road.

Traffic Study Area

The traffic study area for the proposed VEGA 6 project was based on the County of Imperial Department of Public Works Traffic Study and Report Policy approved by the Board of Supervisors

INTERSECTIONS

The traffic study area for the proposed VEGA 6 project includes the following intersections:

1. Buck Road and SR/78/86 (located west of Westmorland)
2. Martin Road and SR-78/86 (located on the west edge of Westmorland)
3. Center Street and SR-78/86 (located midway in Westmorland)
4. Boarts Road (CR-26) and SR-78/86 (located on the eastside of Westmorland)
5. SR-86 and SR-78 (Brawley Bypass)

ROADWAY SEGMENTS

The traffic study area for the proposed VEGA 6 project includes the following roadway segments:

1. SR-78/86 from SR-78/86 from the Buck Road to the north
2. SR-78/86 from Buck Road to Martin Road
3. SR-78/86 from Martin Road to Center Street
4. SR-78/86 SR-7 from Center Street to Boarts Road (CR-26)
5. SR-78/86 SR-7 from Boarts Road (CR-26) to Brawley Bypass
6. Center Street from Baughman Road to SR 78/86

Existing Level of Service

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.

INTERSECTIONS

All of the study area intersections analyzed currently operate at acceptable LOS C or better during the AM and PM peak hours under existing conditions.

ROADWAY SEGMENTS

All of the study area roadway segments analyzed currently operate at acceptable LOS B or better under existing conditions.

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. 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 operates 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 2021).

The VEGA 6 project site is not within the Fixed Route Transportation system and, therefore, would not receive regular bus service to the VEGA 6 project site or within the vicinity of the VEGA 6 project site. The nearest IVT bus stop is located in the City of Westmorland at Main Street and Center Street, approximately 4.4 miles northeast of the VEGA 6 project site.

BICYCLE FACILITIES

The VEGA 6 project site is located within a rural portion of Imperial County. There are no bicycle facilities in the immediate proximity of the VEGA 6 project site.

Project Site Access

Access to and from the VEGA 6 project site will be provided from the intersection of SR-78/86 at Buck Road. The access route will include Buck Road between SR 78/86 and Garvey Road, and Garvey Road between Buck Road to Andres Road. Vehicles will cross over the Westside Main Canal on Andre Road.

Ramon Substation Expansion

Existing Circulation Network

The following is a description of the nearby roadway network:

Ramon Road is identified as an arterial (128-foot ROW) in the Riverside County General Plan. Ramon Road is a two-lane arterial in Thousand Palms, California. The Thousand Palms area is located along Interstate 10 at the intersection of Ramon Road. This unincorporated area is characterized by mobile home subdivisions, single-family residential neighborhoods, and rural residential development. Commercial and industrial developments are located along Ramon Road and Varner Road. Tourist-oriented commercial uses such as truck stops, motels, and fast-food restaurants are located at the interchanges of Interstate 10 with Ramon Road and, to a lesser extent, Monterey Avenue.

Interstate 10 is a six-lane divided highway with three lanes provided in each direction within proximity of the Ramon Substation Expansion project.

Alternative/Public Transportation

FIXED ROUTE TRANSPORTATION

The public transit system alternatives for Riverside County include fixed route public transit systems, common bus carriers, AMTRAK (intercity rail service), Metrolink (commuter rail service), and other local agency transit and paratransit services.

The Riverside Transit Agency (RTA) operates fixed bus routes providing public transit service throughout a 2,500- square-mile area of western Riverside County. RTA's fixed routes have been designed to establish transportation connections between all cities and unincorporated communities in western Riverside County. RTA currently operates full-size buses, mini-buses, vans, and trolleys.

SunLine Transit Agency (SunLine) provides public interest transit services for the Coachella Valley and Yucca Valley areas of Riverside County. RTA 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, RTA 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 Riverside County.

The Ramon Substation expansion area is not within the Fixed Route Transportation system and, therefore, would not receive regular bus service to the Ramon Substation expansion area or within the vicinity of the Ramon Substation expansion area.

BICYCLE FACILITIES

The Ramon Substation expansion area is located within a rural portion of Riverside County. There are no bicycle facilities in the immediate proximity of the Ramon Substation expansion area.

Project Site Access

Access to and from the Ramon Substation expansion area will be provided via Ramon Road.

3.13.2 Regulatory Setting

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

State

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, level of service (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.

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 VEGA 6 project and potential construction access routes within Imperial County, Caltrans District 11 is responsible for maintaining and managing I-8 and SR-78/86.

Regional

Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (ConnectSoCal)

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

Imperial County General Plan

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).

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.

County of Riverside Transportation Analysis Guidelines

The purpose of the Transportation Analysis Guidelines is to provide instructions for analyzing projects in compliance with (1) the Riverside County's General Plan policies and (2) transportation related Vehicle Miles Traveled analysis as required under CEQA. All projects, whether public or private, requiring a discretionary approval trigger the CEQA review process. The objective of this process, in part, is to identify significant environmental impacts, including those from transportation impacts.

Certain types of projects, because of their size, nature, or location, are exempt from the requirement of preparing a LOS analysis. The following types of projects are generally exempt from preparing a LOS analysis:

1. All Residential Parcel Maps.
2. Single Family Residential Tracts of less than 100 lots.
3. Apartments and other Multiple Family projects of less than 150 units.
4. Plot Plan and Uses Cases for projects of one acre or less.
5. Preschools, Elementary Schools and Middle Schools.
6. Churches, Lodges, Community Centers, Neighborhood Parks and Community Parks.
7. Mini Storage Yards
8. Congregate Care Facilities that contain significant special services, such as medical facilities, dining facilities, recreation facilities and support retail facilities.
9. Level 1 projects (100-200 peak hour trips) in areas where a comprehensive traffic analysis has been performed and road improvement infrastructure funding mechanisms are in place. The Transportation Department may, however, require a traffic analysis for projects that are anticipated to exhibit potential adverse deficiencies on the circulation system.
10. Any use which can demonstrate, based on the most recent edition of the Trip Generation Report published by the Institute of Transportation Engineers (ITE) or other approved trip generation data, trip generation of less than 100 vehicle trips during the peak hours.

3.13.3 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

VEGA 6

COUNTY OF IMPERIAL

ROADWAY SEGMENT LEVEL OF SERVICE STANDARDS

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. Furthermore, a project may result in a significant impact on Caltrans facilities if the new project traffic has decreased the operations of surrounding roadways and intersections by a defined threshold.

PEAK HOUR INTERSECTION LEVEL OF SERVICE STANDARDS

A project is considered to have a significant impact on Caltrans facilities if the project traffic has decreased the operations of surrounding roadways by a defined threshold. The Traffic Impact Study (Appendix J of this EIR) used principles of the specific analysis methods contained in the 2010 Highway Capacity Manual to analyze traffic conditions on roadway facilities. The analysis of peak hour intersection conditions was conducted using the Synchro 10 software program developed by Trafficware. Table 3.13-1 summarizes the LOS criteria for signalized and unsignalized intersections.

The County of Imperial traffic impact study guidelines consider LOS C or better during the AM and PM peak hours to be the threshold of significance for intersection LOS. Therefore, if the proposed project exceeds the County's LOS C threshold for surrounding roadways intersections, then the proposed project may have a significant project impact.

Table 3.13-1. HCM Level of Service Thresholds for Intersections

LOS	Signalized Intersection Delay (Seconds/Vehicle)	Unsignalized Intersection Average Stop Delay (Seconds/Vehicle)
A	0.0 ≤ 10.0	0.0 ≤ 10.0
B	10.1 to 20.0	10.1 to 15.0
C	20.1 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	≥ 80.0	≥ 50.0

Source: Appendix J of this EIR
LOS – level of service

CALIFORNIA DEPARTMENT OF TRANSPORTATION

Freeway LOS analysis is based upon procedures developed by Caltrans. Consistent with Caltrans requirements, LOS D or better is used as the threshold for acceptable freeway operations. For freeway segments that operate at LOS D or lower, an incremental increase in v /c of greater than 0.01 is considered to be a significant impact.

PROJECT TRIP GENERATION

The project trip generation consists of a construction phase and operations phase. Once constructed, the VEGA 6 project will not require personnel to be present on-site and will not result in daily trip generation.

The construction of the VEGA 6 project is estimated to take 12-18 months and would begin in 2023. The number of on–site construction workers for the solar project facilities is not expected to exceed 100 workers at any one time. The number of on-site construction workers for the battery storage facility and the substation is not expected to exceed 50 workers at any one time. The trip generation was estimated if the construction phases were to overlap, so both are included. Delivery trucks are expected to follow the same routes as the construction workers. An estimated two trucks would arrive at the project site each day during the first few weeks of construction of the solar generating facility. Truck trips have been converted into passenger equivalent volumes (PCE) using a PCE factor of 2.5.

According to KOA, a maximum of 320 average daily trips (ADT) would be generated during project construction, accounting for construction worker commutes and equipment deliveries.

Ramon Substation Expansion

COUNTY OF RIVERSIDE TRANSPORTATION ANALYSIS GUIDELINES

As previously mentioned above, the County of Riverside Transportation Analysis Guidelines identifies certain types of projects, because of their size, nature, or location, which are exempt from the requirement of preparing a LOS analysis. The proposed Ramon Substation expansion would be exempt because anticipated trip generation rates would be less than 100 vehicle trips during the peak hours.

The construction of the Ramon Substation expansion is estimated to take 180 working days and would begin in 2024. The number of on–site construction workers is not expected to exceed 20 workers at any one time (40 ADT). Vendor trips is not expected to exceed 29 ADT during peak of construction. A maximum of 69 ADT would be generated during construction. Once constructed, the proposed Ramon Substation expansion will not require personnel to be present on-site and will not result in daily trip generation. Because the proposed Ramon Substation expansion is estimated to generate less than 100 vehicle trips during peak hours, it would be considered exempt from the requirement of preparing a LOS analysis.

Impact Analysis

Impact 3.13-1 Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

VEGA 6

During the construction phase of the proposed VEGA 6 project, the maximum number of trips generated on a daily basis would be approximately 320 trips. Under construction year conditions with and without the proposed project, all roadway segments analyzed would operate at LOS B or better and all intersections would operate at a LOS C or better during both AM and PM peak hours.

Implementation of the proposed VEGA 6 project would not require any public road widening to accommodate vehicular trips associated with the proposed VEGA 6 project (construction phase and operational phase), while maintaining adequate LOS. Additionally, future operations and maintenance would be conducted remotely, with minimal trips to the project site for panel washing and other solar maintenance. 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 VEGA 6 project would not interfere with bicycle facilities because the proposed VEGA 6 project is located in a rural portion of the County with no existing or potential future designated bike routes in the area. Therefore, the proposed VEGA 6 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.

Ramon Substation Expansion

During the construction phase of the Ramon Substation expansion, the maximum number of trips generated on a daily basis would be approximately 69 trips. Because the proposed Ramon Substation expansion is estimated to generate less than 100 vehicle trips during peak hours, it would be considered exempt from the County of Riverside’s requirement of preparing a LOS analysis.

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 Ramon Substation expansion would not interfere with bicycle facilities because the proposed expansion area is located in a rural portion of the County with no existing or potential future designated bike routes in the area. Therefore, the proposed expansion 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)

VEGA 6

No mitigation measures are required.

Ramon Substation Expansion

No mitigation measures are required.

Impact 3.13-2 Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

VEGA 6

Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project.

Although the proposed VEGA 6 project would increase VMT during the construction phase as a result of trips made by construction workers and transportation of construction material and equipment, these increases are temporary in nature. Further, as discussed above, operation of the proposed VEGA 6 project would only require intermittent maintenance (including inspection, panel washing, and vegetation removal), which would be a nominal amount of vehicle trips generated (12 trips annually). Therefore, the proposed VEGA 6 project would not conflict or be inconsistent with Section 15064.3(b) of the CEQA Guidelines and this impact is considered less than significant.

Ramon Substation Expansion

Although the proposed Ramon Substation expansion would increase VMT during the construction phase as a result of trips made by construction workers and transportation of construction material and equipment, these increases are temporary in nature. Further, as discussed above, the proposed Ramon Substation expansion will not require personnel to be present on-site and will not result in daily trip generation. Therefore, the proposed VEGA 6 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)

VEGA 6

No mitigation measures are required.

Ramon Substation Expansion

No mitigation measures are required.

Impact 3.13-3 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)?

VEGA 6

To accommodate emergency access, PV panels would be spaced to maintain proper clearance. Internal access roads, up to 30-feet wide, would be constructed along the perimeter fence and solar

panels to facilitate vehicle access and maneuverability for emergency unit vehicles. Access roads would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access. Additionally, any proposed haul routes would be submitted to the County for approval prior to construction. Therefore, the VEGA 6 project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts are considered less than significant.

Ramon Substation Expansion

No public roadways would be constructed as a part of the proposed Ramon Substation expansion. Incompatible uses associated with the proposed expansion, such as use by construction equipment and transport of materials would be short-term and minor and impacts would be less than significant.

Mitigation Measure(s)

VEGA 6

No mitigation measures are required.

Ramon Substation Expansion

No mitigation measures are required.

Impact 3.13-4 Would the project result in inadequate emergency access?

VEGA 6

Access to and from the VEGA 6 project site will be provided from the intersection of SR-78/86 at Buck Road. The access route will include Buck Road between SR 78/86 and Garvey Road, and Garvey Road between Buck Road to Andres Road. Vehicles will cross over the Westside Main Canal on Andre Road. PV panels would be spaced to maintain proper clearance for emergency access. Internal access roads, up to 30-feet wide, would be constructed along the perimeter fence and solar panels to facilitate vehicle access and maneuverability for emergency unit vehicles. Access roads would be graded and compacted (native soils) as required for construction, operations, maintenance, and emergency vehicle access. The access roads would also have turnaround areas at any dead-end to allow clearance for fire trucks per fire department standards. Therefore, the VEGA 6 project would not result in inadequate emergency access and impacts are considered less than significant.

Ramon Substation Expansion

Similar to existing conditions, access to and from the Ramon Substation expansion area will be provided via Ramon Road. The County of Riverside will review the proposed site plan to ensure that adequate emergency access would be available at the site. Accordingly, the proposed Ramon Substation expansion would not result in inadequate emergency access during long-term operation of the project and impacts would be less than significant.

Mitigation Measure(s)

VEGA 6

No mitigation measures are required.

Ramon Substation Expansion

No mitigation measures are required.

3.13.4 Decommissioning/Restoration and Residual Impacts

Decommissioning/Restoration

If at the end of the PPA term, no contract extension is available for a power purchaser, no other buyer of the energy emerges, or there is no further funding of the project, the project will be decommissioned and dismantled. As presented above, construction traffic would not result in a significant impact on any of the project area roadway segments, intersections, and freeway segments 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 and roadway segments. Therefore, less than significant impacts have been identified. No mitigation is required, and no residual unmitigated impacts would occur with implementation of the proposed project.