California Department of Transportation

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March 23, 2022

11-IMP-115
PM 4.04
Vikings Solar Energy Generation and Storage Project
DEIR/SCH# 2021050036

Ms. Diana Robinson
Planning Division Manger
Imperial County Planning & Development Services Department (ICPDS)
801 Main Street
El Centro, CA 92243

Dear Ms. Robinson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Vikings Solar Energy Generation and Storage Project located near State Route 115 (SR-115). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the County of Imperial in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and connections

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Engineering and Analysis

1. The "Transportation and Traffic" Chapter of the DEIR needs to be updated to reflect the actual viable access to the Project Site. Page 4.15-14 needs to be updated per our previous comments re-stated below:
2. All construction vehicles and heavy truck deliveries shall not use the dirt access road at the Intersection of SR-115/Evan Hewes Highway and Nelson Pit (dirt) Road.
    a. The shoulder structural section would be severely impacted and possibly damaged if the construction site is accessed via this intersection.
    b. The motoring public will not be expecting construction vehicles and heavy trucks to enter and exit from Nelson Pit Road.
    c. There will be heavy soil tracking onto the state facility.
3. Access to the project site shall be made via only the paved roads of Kavanaugh Road, Miller Road, and Nelson Pit Road.
4. The intersections of SR-115/Evan Hewes Highway at Miller Road, and SR-115/Evan Hewes Highway at Kavanaugh Road will require some type of notice to motorist on SR-115 of construction vehicles entering/ exiting the construction site.
    a. Possible offsite traffic control signs or PCMS's might be required on SR-115.
    b. Possible Encroachment Permit might be required.
5. Provide a construction access route exhibit to see how trucks will impact SR-115.

<u>Comments to the DEIR</u>

6. Remove Intersections 2, 5, and 6 from the study since these intersection lead to dirt roads that are very unlikely to be used when there are existing viable paved roads that lead to the project site.
7. Page 4.15-14 states: "the construction worker traffic is expected to travel to the site from either SR-115 east or I-8 east, to north on Miller Road and east on Nelson Pit Road to the Project site."
    a. There are two direct ways to get to the project site using paved roads and not dirt roads as shown on this study. It is highly unlikely that motorist will use these dirt roads when there are viable paved roads that lead to the project site.
    b. Construction workers coming from Holtville will most likely use eastbound SR-115/Evan Hewes Highway and merge onto eastbound Kavanaugh Road, then that road turns southbound and becomes Miller Road. Then a left turn will be made onto eastbound Nelson Pit Road. Please note that Nelson Pit Road is only paved from Miller Road to the east only.

   c. Construction workers coming from the I-8 Freeway ramps will turn onto northbound SR-115. Then they will make a left onto northbound Miller Road and make a right on Nelson Pit Road. I do not believe that motorist will use Bonds Corner Road intersection instead of the next intersection to the East that gives you a more direct route to the project site.
8. Page 4.15-14 trip distribution does not make sense and conflict with comments on page 4.15-3.
9. Any impacts, structures, utilities, or other miscellaneous items related to this project that do encroach within Caltrans Right-of-Way (R/W) will require further review and encroachment permits.
10. Please see my redline comments on the "Transportation and Traffic" section of the DEIR attached.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of Imperial, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at https://dot.ca.gov/programs/traffic-operations/ep. Early coordination with Caltrans is strongly advised for all encroachment permits.

Right-of-Way Utilities

McIntyre Environmental, LLC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of SR-115 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

Please see the following chapters in the Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a11y.pdf .

- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and state R/W: https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf

- Chapter 17 of the Project Development Procedures Manual https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf.

If you have any questions or concerns, please contact Charlie Lecourtois, IGR Coordinator, at (619) 985-4766 or by e-mail sent to charlie.lecourtois@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

Attachment – TE&A Comments and Review of Pg 343-363 from DEIR

4.15 Transportation and Traffic

This section addresses potential transportation and traffic impacts that may result from construction, operation, maintenance and decommissioning of the Vikings Solar Energy Generation and Storage Project. The following discussion addresses the existing traffic in the Project area, identifies applicable regulations, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable.

Information used in preparing this section and in the evaluation of potential transportation and traffic was derived from the Traffic Impact Study prepared by Kittelson & Associates which is provided as Appendix M this EIR (Kittelson & Associates, 2022).

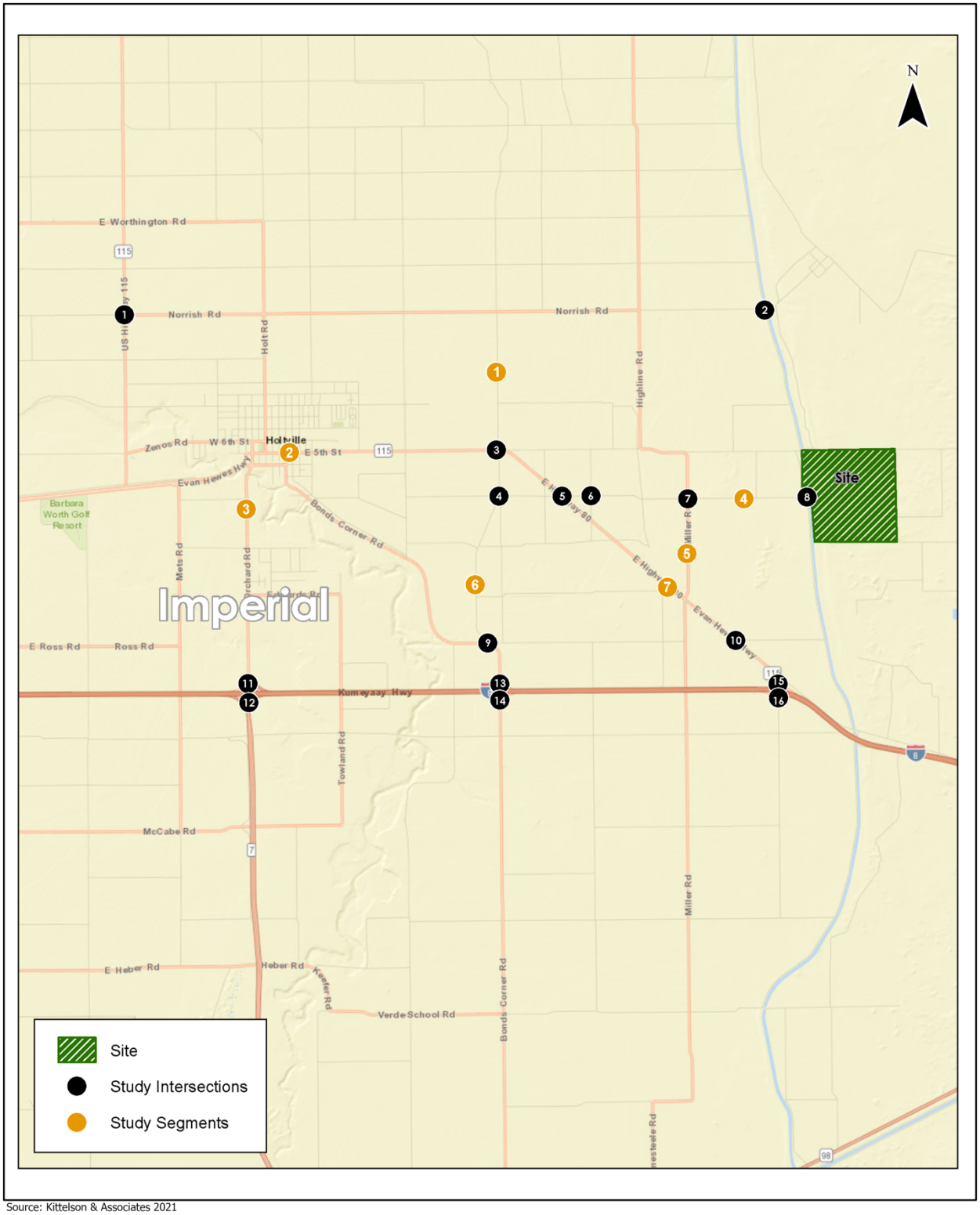
The following locations were analyzed as part of the traffic study (see Figure 4.15-1):

Intersections

- SR 115/Norrish Road
- Graeser Road/Norrish Road
- Snyder Road/Evan Hewes Highway
- Snyder Road/Nelson Pit Road
- SR 115/Nelson Pit Road
- Fust Road/Nelson Pit Road
- Miller Road/Nelson Pit Road
- Graeser Road/Nelson Pit Road
- Bonds Corner Road/Ogier Road/Snyder Road
- Evan Hewes Highway/Graeser Road
- Orchard Road (County Route S7)/I-8 WB Ramps
- Orchard Road (County Route S7)/I-8 EB Ramps
- Bonds Corner Road & I-8 WB Ramp
- Bonds Corner Road & I-8 EB Ramps
- SR 115 & I-8 WB Ramps
- SR 115 & I-8 EB Ramps

Segments

- Snyder Road, from Nelson Pit Road to Norrish Road
- SR 115, from Walnut Avenue to Maple Avenue
- Orchard Road, from County Route S7 to SR 115
- Nelson Pit Road, from Evan Hewes Highway to the Project Site
- Miller Road, from Evan Hewes Highway to Nelson Pit Road
- Snyder Road, from Evan Hewes Highway to Nelson Pit Road
- Evan Hewes Highway, from Snyder Road to Van Der Linden Road



Source: Kittelson & Associates 2021

Traffic Study Area
Vikings Solar Energy Generation and Storage Project
Figure 4.15-1

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from agencies and the public. The following issues related to transportation and traffic were raised by the California Department of Transportation (Caltrans) and the Imperial County Department of Public Works (DPW) and are addressed in this section:

Noted but following pages and traffic study referred to contradict our analysis.

Caltrans

Traffic Engineering Analysis

- All construction vehicles and heavy truck deliveries shall not use the dirt access road at the Intersection of State Route (SR)-115/Evan Hewes Highway and East Nelson Pit (dirt) Road.
  - The shoulder structural section would be severely impacted and possibly damaged if the construction site is accessed via this intersection.
  - The motoring public will not be expecting construction vehicles and heavy trucks to enter and exit from East Nelson Pit Road.
  - There will be heavy soil tracking onto the state facility.
- Access to the Project site shall be made via only the paved roads of Kavanaugh Road, Miller Road, and Nelson Pit Road.
- The intersections of SR-115/Evan Hewes Highway at Miller Road, and SR-115/Evan Hewes Highway at Kavanaugh Road will require some type of notice to motorist on SR-115 of construction vehicles entering/exiting the construction site.
- Possible offsite traffic control signs or portable changeable message signs (PCMS) might be required on SR-115.
- Possible Encroachment Permit might be required.
- Provide a construction access route exhibit to see how trucks will impact SR-115.
- Any impacts, structures, utilities, or other miscellaneous items related to this project that do encroach within Caltrans right of way will require further review and encroachment permits.

Design

- If the intersections between SR-115 and the side streets leading to the entrance of the power generation plant are to be paved, the pavement and intersection should be designed per the Caltrans Highway Design Manual (HDM), especially to accommodate the larger turning radius that may be needed for the trucks.

Noted

Traffic Control Plan/Hauling

- Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code.
- If a Traffic Control Plan is required, it is to be submitted to Caltrans District 11, including the intersections along SR-115 in the project's vicinity at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.
- Potential impacts to the highway facilities (SR-115) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' right of way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Imperial County Department of Public Works

East Nelson Pit Road is rated for less than legal weights. It has a limited weight capacity of less than 63,500 pounds and is also 18 feet in width. It is unable to accommodate the typical semi-trailer transport due to its operating rating and is limited to one lane direction at a time due to its narrow width.

4.15.1 Environmental Setting

Existing Roadway Network

The roadway system in the Project vicinity consists of interstate freeways, state routes and arterial, collector, and local roadways that serve local and regional traffic demand. The vehicular facilities in the Project vicinity are discussed below.

Interstate and State Roadways

Interstate-8 (I-8) is the primary east-west route through Imperial County, running from San Diego, California to Arizona. It is a four-lane facility with complete grade separation and a speed limit of 70 miles per hour (mph).

State Route 115 (SR-115) has a distance of 33.6 miles and facilitates interregional agricultural goods movement and provides intraregional travel between various cities within Imperial County. For the most part, SR-115 is a two-lane conventional highway, although some short segments are four lanes. The posted speed limit of 65 mph.

Evan Hewes Highway (SR-115) is an east-west, two-lane undivided paved road from Austin Road to La Brucherie Road. Bike lanes or bus stops are not provided, and the posted speed limit is 40 mph.

State Route-7 (SR-7) is a four-lane highway that connects I-8 to the border of Mexico in Calexico. The posted speed limit is 65 mph.

Arterial Roadways

Kavanaugh Road is an east-west, two-lane roadway with a posted speed limit of 65 mph. The road merges with SR-115 for approximately one mile, and this road connects Graeser Road. It is a paved road west of Miller Road and becomes an unpaved road east of Miller Road.

Bonds Corner Road is a two-lane, north-south facility which connects from SR-98 in Calexico to the city of Holtville. It connects to I-8 via a diamond interchange with stop sign controls on the east and west approaches. The posted speed limit is 55 mph.

Orchard Road is a two-lane, north-south road that connects I-8 to the city of Holtville. The interchange at I-8 is a partial cloverleaf interchange with stop sign controls on the east-west approaches. The posted speed limit is 55 mph.

Collector Roadways

Snyder Road is a two-lane, north-south road that is 24 feet wide with unpaved shoulders.

Miller Road, also known as County Highway S-33 in the study area, is a two-lane, north-south road with unpaved shoulders.

Local Roadways

Norrish Road is a two-lane, east-west road that runs from SR-115 to Graeser Road.

Nelson Pit Road is upaved from Snyder Rd to Miller Rd

Nelson Pit Road is a two-lane, east-west road with unpaved shoulders.

Fust Road is an unpaved two-lane, north-south road.

Graeser Road is an unpaved two-lane local road that runs east from Miller Road until the irrigation channel, where it runs north parallel to the channel.

Ogier Road is an unpaved two-lane local road that connects Snyder Road and Miller Road. It becomes Graeser Road west of Miller Road.

Transit, Bicycle and Pedestrian Facilities

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

Airports

The Holtville Airport, located approximately 1.6 miles north of the Project site, is the nearest public airport.

Existing Traffic Conditions

The following provides a summary of existing traffic conditions on study roadways and intersections.

Level of Service Standards

A project's effect on roadway capacity and Level of Service (LOS) does not constitute a significant environmental impact under the California Environmental Quality Act (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 requires intersections and roadway segments to maintain a peak-hour LOS of C or better.

Intersection Level of Service Definitions

For this analysis, LOS is based on the *Highway Capacity Manual* (HCM) 6th edition definitions, included as Table 4.15-1: Level of Service Standards for ease of reference. The HCM methodology assigns a LOS grade to an intersection based on the delay for vehicles at the intersection, ranging from LOS A to LOS 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.

TABLE 4.15-1: LOS DEFINITIONS FOR SIGNALIZED AND UNSIGNALIZED INTERSECTIONS

Level of Service (LOS)	Average Control Delay (Signalized) (sec/veh)	Average Control Delay (Unsignalized) (sec/veh)
A	≤ 10.0	≤ 10
B	10.0 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	≥ 80.1	≥ 50.0

Source: Kittelson & Associates, 2022 (Appendix M).

Roadway Segment Level of Service Definitions

For Roadway segments, operations were assigned a Level of Service letter grade ranging from LOS A to LOS F (from better to worse congestion), with LOS "A" signifying free-flow traffic and LOS F signifying volumes that are over roadway capacity. For this analysis, the LOS and ADT corresponding table (Table 4.15-2) from the Circulation and Scenic Highway Element of the Imperial County General Plan was utilized.

TABLE 4.15-2: LEVEL OF SERVICE DEFINITIONS FOR ROADWAY SEGMENTS

Roadway Classification	Level of Service and ADT				
	A	B	C	D	E
Prime Arterial	22,200	37,000	44,600	50,000	57,000
Minor Arterial	14,800	24,700	29,600	33,400	37,000
Minor Collector	1,900	4,100	7,100	10,900	16,200

Notes: ADT=Average Daily Traffic.
Source: Kittelson & Associates, 2022 (Appendix M).

Intersection Operations

A LOS analysis was performed for the Project vicinity for the weekday AM peak hour (7:15 to 8:15) and PM peak hours (4:15 to 5:15) using traffic counts collected December 18, 2020. Table 4.15-3 provides a summary of the existing automobile LOS. As shown in Table 4.15-3, all study area intersections operate acceptably (at LOS C or better) under existing conditions.

TABLE 4.15-3: EXISTING INTERSECTION OPERATIONS

No.	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay (Sec)	LOS	Delay (Sec)	LOS
1	SR 115 & Norrish Road	TWSC	10.4	B	9.4	A
2	Graeser Road & Norrish Road	TWSC	8.6	A	8.5	A
3	Snyder Road & Evan Hewes Highway	TWSC	9.6	A	9.7	A
4	Snyder Road & Nelson Pit Road	TWSC	8.7	A	8.6	A
5	SR 115 & Nelson Pit Road	TWSC	9.1	A	9.6	A
6	Fust Road & Nelson Pit Road	TWSC	8.3	A	8.3	A
7	Miller Road & Nelson Pit Road	TWSC	9.1	A	9.1	A
8	Graeser Road & Nelson Pit Road	TWSC	0.0(*)	A	7.2	A
9	Bonds Corner Road/Ogier Road & Snyder Road	TWSC	9.3	A	9.3	A
10	Evan Hewes Highway & Graeser Road	TWSC	9.1	A	8.6	A
11	Orchard Road (S7) & I-8 WB Ramps	TWSC	9.0	A	8.9	A
12	Orchard Road (S7) & I-8 EB Ramps	TWSC	9.2	A	9.1	A
13	Bonds Corner Road & I-8 WB Ramp	TWSC	8.8	A	8.6	A
14	Bonds Corner Road & I-8 EB Ramps	TWSC	8.6	A	8.7	A
15	SR 115 & I-8 WB Ramps	TWSC	8.5	A	8.5	A
16	SR 115 & I-8 EB RAMPS	TWSC	8.9	A	9.3	A

Notes:
* Delay of 0.0 second means traffic volumes are zero or no conflicts.
TWSC = Two-Way Stop Sign Controlled.
Source: Kittelson & Associates, 2022 (Appendix M).

Signalized Delay/LOS Thresholds		Unsignalized Delay/LOS Thresholds	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

Roadway Segment Operations

Table 4.15-4 provides a summary of existing roadway segment operations in the study area and denotes all roadway segments operating acceptably (at LOS "C" or better) under existing conditions.

TABLE 4.15-4: EXISTING ROADWAY OPERATIONS

Roadway Segment	LOS C Capacity	ADT	V/C Ratio	LOS
Snyder Rd/Nelson Pit Rd to Norrish Rd	7,100	964	0.14	A
SR 115 from Walnut Ave to Maple Ave	44600	5,957	0.13	A
Orchard Rd from S7 to SR 115	29600	4,527	0.15	A
Nelson Pit Rd from Evan Hewes Highway to Project Site	7,100	77	0.01	A
Miller Rd from Evan Hewes Highway to Nelson Pit Rd	7,100	466	0.07	A
Snyder Rd from Evan Hewes Highway to Nelson Pit Rd	7,100	536	0.08	A
Evan Hewes Highway from Snyder Rd to Van Der Linden Rd	44,600	2,273	0.05	A

Source: Kittelson & Associates, 2022 (Appendix M).

4.15.2 Regulatory Setting

State

California Department of Transportation (Caltrans)

Caltrans has jurisdiction over state highways and establishes maximum load limits for trucks and safety requirements for oversized vehicles that operate on highways. Transportation and traffic impacts are regulated by Caltrans codes pertaining to licensing, size, weight, and load of vehicles operated on highways (California Vehicle Code [CVC], division 15, chapters 1 through 5) as well as the Street and Highway Code (Code §§660-711, 670-695) which requires permits from Caltrans for any roadway encroachment during truck transportation and delivery. The Street and Highway Code includes regulations for the care and protection of state and county highways and provisions for the issuance of written permits and requires permits for any load that exceeds Caltrans weight, length, or width standards for public roadways.

Senate Bill 743 (SB-743)

Senate Bill 743/State CEQA Guidelines Senate Bill (SB) -743, signed in 2013, required a change in the way that transportation impacts are analyzed under CEQA. Historically, environmental review of transportation impacts has focused on the delay vehicles experience at intersections and roadway segments, as expressed in LOS. The legislation, however, sets forth that upon certification of new guidelines by the Secretary of the Natural Resources Agency, automobile delay, as described solely by LOS or other similar measures of traffic congestion shall not be considered a significant impact on the environment. Local jurisdictions may continue to consider LOS with regard to local general plan policies, zoning codes, conditions of approval, thresholds, and other planning requirements. New criteria for measuring traffic impacts under CEQA are to focus on the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses.

State CEQA Guidelines Section 15064.3 was adopted in December 2018 to implement SB 743. In addition to establishing Vehicle Miles Traveled (VMT) as the most appropriate measure of transportation impacts, and shifting away from LOS, primary elements of this section:

- Reiterate that a project's adverse effect on automobile delay shall not constitute a significant environmental impact;
- Create a rebuttable presumption of no significant transportation impacts for (a) land use projects within 0.5-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allow a lead agency to qualitatively evaluate VMT if existing models are not available; and

Give lead agencies discretion to select a methodology to evaluate a project's VMT, but requires disclosure of that methodology in the CEQA documentation. Lead agencies are required to comply the with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the State Office of Planning and Research (OPR) has also published a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), which provides guidance in the calculation and application of VMT analyses within CEQA documents.

Local

The Imperial County General Plan Circulation and Scenic Highways Element 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 Circulation and Scenic Highways Element policies related to the proposed Project are outlined below. Table 4.15-5 summarizes the proposed Project's consistency with the applicable General Plan policies.

While this DEIR 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 4.15-5: CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS, POLICIES AND/OR OBJECTIVES

General Plan Policies and Objectives	Consistency with General Plan	Analysis
Circulation and Scenic Highways Element (CSHE)		
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.	Yes	A Traffic Impact Report (Appendix M) has been prepared which demonstrates that the proposed Project would not cause existing roadways or intersections to operate below a Level of Service "C". The Traffic Impact Report also evaluated potential VMT impacts and found the Project met the small project screening criteria and was not found to have a significant VMT impact. Traffic impacts would not be significant. No mitigation is required.
CSHE Objective 1.2: Require a traffic analysis for any new development which may have a significant impact on County roads.	Yes	See Response above.
CHSE Objective 1.12: Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on	Yes	See Response above.

TABLE 4.15-5: CONSISTENCY WITH GENERAL PLAN TRANSPORTATION GOALS, POLICIES AND/OR OBJECTIVES

General Plan Policies and Objectives	Consistency with General Plan	Analysis
Circulation and Scenic Highways Element (CSHE)		
existing roadways and intersection to a level of service (LOS) worse than "C" without providing appropriate mitigations to existing infrastructure.		

Source: County of Imperial, General Plan Circulation and Scenic Highway Element, 2008.

4.15.3 Analysis of Project Effects and Significance Determination

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

Methodology

The analysis prepared in this section is based on a *Traffic Impact Study* prepared by Kittelson & Associates (Kittelson & Associates, 2022: Appendix M). As discussed above, under SB-743, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, OS) and other similar vehicle delay or capacity metrics may no longer serve as transportation impact metrics for CEQA impact analyses. The OPR has updated the CEQA Guidelines and provided a final technical advisory in December 2018 which recommends VMT as the most appropriate measure of transportation impacts under CEQA. For land use and transportation projects, SB-743-compliant CEQA analysis became mandatory on July 1, 2020. Automobile delay, as described solely by LOS or similar measure of traffic congestion, is no longer considered a significant impact under CEQA. However, the County of Imperial DPW 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.

VMT Impact Significance Criteria

The County has not adopted its own VMT thresholds, for this reason the OPR Technical Advisory (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)
- Provision of affordable housing

The thresholds for a significant VMT impact are summarized in Table 4.15-6.

TABLE 4.15-6: OPR'S RECOMMENDED VMT SIGNIFICANCE THRESHOLDS

Residential	Exceeding a level of 15 percent below existing VMT per capita
Office	Exceeding a level of 15 percent below existing regional VMT per employee
Retail	A net increase in total VMT

Source: Kittelson & Associates, 2022 (Appendix M).

The seven (7) street segments and intersections selected for purposes of the analysis are presented in Section 4.15-1 and are shown on Figure 4.15-1. Figure 4.15-2 shows automobile peak hour volumes at the study intersections. Intersection control (i.e., signalized or stop-controlled) and lane geometries are also shown.

Guidelines for Determination of Significance

A project would be considered to have a significant impact if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, 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?

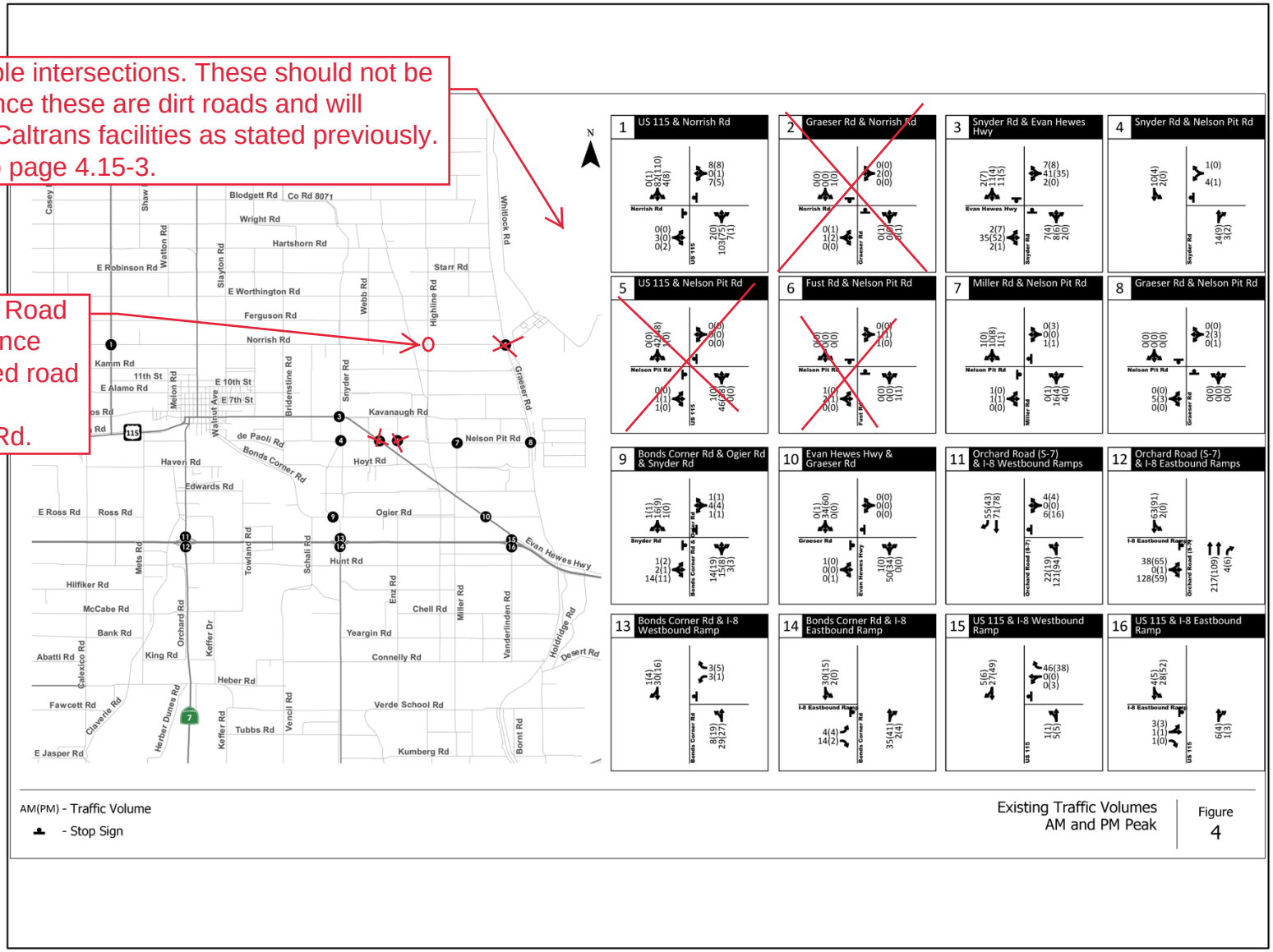
Analysis

Impact 4.15-1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project consists of construction; operations and maintenance and decommissioning phases. Construction activities will be the primary generator of trips for the project. Therefore, to identify any impacts the addition of construction trips may cause, the LOS analyses of the study intersections and roadway segments during project construction were conducted.

Not viable intersections. These should not be used since these are dirt roads and will impact Caltrans facilities as stated previously. Refer to page 4.15-3.

add Highline Road intersetion since this is a paved road that leads to Kavanaugh Rd.



Source: Kittelson & Associates 2021

Existing Traffic Volumes - AM and PM Peak Hour
Vikings Solar Energy Generation Project
Figure 4.15-2

Construction-Related Trip Generation and Distribution

This section provides the vehicle trip generation and distribution estimates for the proposed Project during construction. The number of on-site workers for the solar project and battery storage facilities is not expected to exceed 180 workers at any one time. As a worst-case condition, it is assumed that every construction worker would drive solo, there would be no carpooling, and all trips would coincide with the commute peak hour traffic hours (7-9 AM and 4-6PM, respectively). In reality, it is likely that some workers will carpool and/or travel outside the commuter traffic peak hours. Under this worst-case assumption, project construction is estimated to generate 180 in-bound trips during the AM peak hour, and 180 out-bound trips during the PM Peak hour. Onsite parking would be provided for all construction workers (Kittelson & Associates, 2022).

Since the bridge on the Nelson Pit Road, which is used by construction workers, has a weight capacity of 55,000 to 60,000 pounds, delivery trucks are prohibited from crossing it. Delivery trucks beyond the 60,000 pounds range are expected to use the bridge on Norrish Road to access the site. The truck delivery windows should be outside the AM and PM peak hours.

possibly Highline Rd

Based on the information provide by project sponsor, the construction worker traffic is expected to travel to the site from either SR-115 east or I-8 east, to north on Miller Road and east on Nelson Pit Road to the Project site. Construction trips are assigned based on the above information, satellite images to identify major origins/destinations near the project, and the Google Maps shortest routes from the site to the major origins/destinations during AM and PM peak hours.

This contradicts page 4.15-3 Caltrans comments.

Dirt Roads not viable

The AM peak trip distribution for the project is as follows:

- 10 percent from the north via SR-115, Norrish Road, and ~~Graeser Road~~
- 5 percent from the north via SR-115, Snyder Road, and ~~Nelson Pit Road~~
- 20 percent from the west via SR-115, Evan Hewes Highway, and ~~Nelson Pit Road~~
- 65 percent from I-8 (60 percent from the west, 5 percent from the south) via Exit 128 - Bonds Corner Road
  - 20 percent via Snyder Road and ~~Nelson Pit Road~~
  - 45 percent via Ogier Road, Miller Road, and Nelson Pit Road

Please use a diagram to show distribution since proposed distribution does not make sense

The PM peak trip distribution for the project is slightly different due to the shortest route showed in Google Maps that drivers are likely to take I-8 during the PM peak hour:

- 10 percent from the north via SR-115, Norrish Road, and ~~Graeser Road~~
- 5 percent from the north via SR-115, Snyder Road, and ~~Nelson Pit Road~~
- 20 percent from the west via SR-115, Evan Hewes Highway, and ~~Nelson Pit Road~~

- 65 percent from I-8 (60 percent from the west, 5 percent from the south) via Nelson Pit Road, Miller Road, and SR-115 to Exit 131 – SR-115 and Van Der Linden Road

All trip distribution destinations total up to 100 percent.

Figure 4.15-3 presents the weekday AM and PM project-only turning movements that were derived from the trip generation and trip distribution discussed in this section.

Existing Plus Project Construction Traffic Conditions

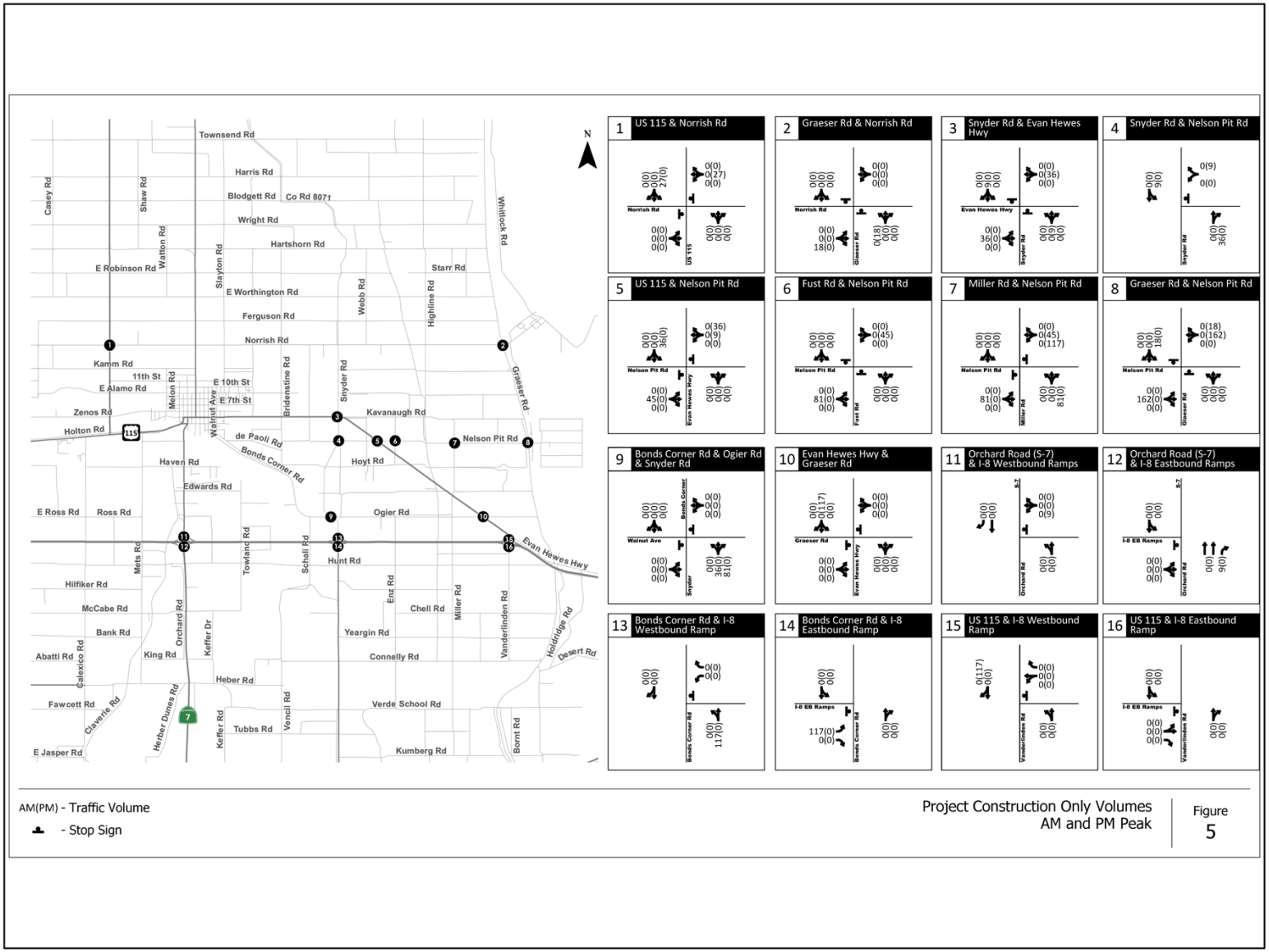
The automobile turning movement counts for the Existing Plus Construction scenario were developed from summing the Existing Conditions turning movement counts and the Construction Only turning movements. Figure 4.15-4 presents the Existing Plus Construction turning movements. The lane configuration during the Existing Plus Construction traffic conditions remains the same as the Existing Conditions (shown in Figure 4.15-2).

Table 4.15-7 presents the Existing Plus Construction delays and LOS for the study intersections. The table also compares the changes in delay between the Existing and Existing Plus Construction scenarios. Appendix C contains the Existing Plus Construction LOS worksheets.

TABLE 4.15-7: INTERSECTION OPERATIONS – EXISTING + CONSTRUCTION

#	Intersection	Weekday AM			Weekday PM		
		Delay (Sec)	LOS	Change	Delay (Sec)	LOS	Change
1	SR 115 & Norrish Road	10.9	B	0.5	10.5	B	1.1
2	Graeser Road & Norrish Road	8.7	A	0.1	8.7	A	0.2
3	Snyder Road & Evan Hewes Highway	10.1	B	0.5	10.2	B	0.5
4	Snyder Road & Nelson Pit Road	8.9	A	0.2	8.5	A	-0.1
5	SR 115 & Nelson Pit Road	10.7	B	1.6	9.6	A	0.0
6	Fust Road & Nelson Pit Road	9.1	A	0.8	8.3	A	0.0
7	Miller Road & Nelson Pit Road	11.2	B	2.1	9.6	A	0.5
8	Graeser Road & Nelson Pit Road	10.7	B	10.7	7.2	A	0.0
9	Bonds Corner Road/Ogier Road & Snyder Road	9.5	A	0.2	9.3	A	0.0
10	Evan Hewes Highway & Graeser Road	9.1	A	0.0	9.4	A	0.8
11	Orchard Road (S7) & I-8 WB Ramps	9.0	A	0.0	9.1	A	0.2
12	Orchard Road (S7) & I-8 EB Ramps	9.2	A	0.0	9.2	A	0.1
13	Bonds Corner Road & I-8 WB Ramp	9.5	A	0.7	8.6	A	0.0
14	Bonds Corner Road & I-8 EB Ramps	9.7	A	1.1	8.7	A	0.0
15	SR 115 & I-8 WB Ramps	8.5	A	0.0	8.6	A	0.1
16	SR 115 & I-8 EB Ramps	8.9	A	0.0	9.3	A	0.0

Source: Kittelson & Associates, 2022 (Appendix M).



Source: Kittelson & Associates 2021

Project Construction Only Volumes - AM and PM Peak Hour
Vikings Solar Energy Generation Project
Figure 4.15-3

As shown in the Table 4.15-8, all study intersections are expected to operate acceptably (LOS C or better) with the additional of Project construction traffic.

TABLE 4.15-8: ROADWAY OPERATIONS – EXISTING + CONSTRUCTION

Roadway Segment	Existing			Construction Trips	Existing + Construction		
	ADT	V/C Ratio	LOS		ADT	V/C Ratio	LOS
Snyder Rd Nelson Pit Rd to Norrish Rd	964	0.14	A	18	982	0.14	A
SR 115 Walnut Ave to Maple Ave	5,957	0.13	A	72	6,029	0.14	A
Orchard Rd S7 to SR 115	4,527	0.15	A	0	4,527	0.15	A
Nelson Pit Rd Evan Hewes Highway to Project Site	77	0.01	A	324	401	0.06	A
Miller Rd Evan Hewes Highway to Nelson Pit Rd	466	0.07	A	198	664	0.09	A
Snyder Rd Evan Hewes Highway to Nelson Pit Rd	536	0.08	A	36	572	0.08	A
Evan Hewes Highway Snyder Rd to Van Der Linden Rd	2,273	0.05	A	0	2,273	0.05	A

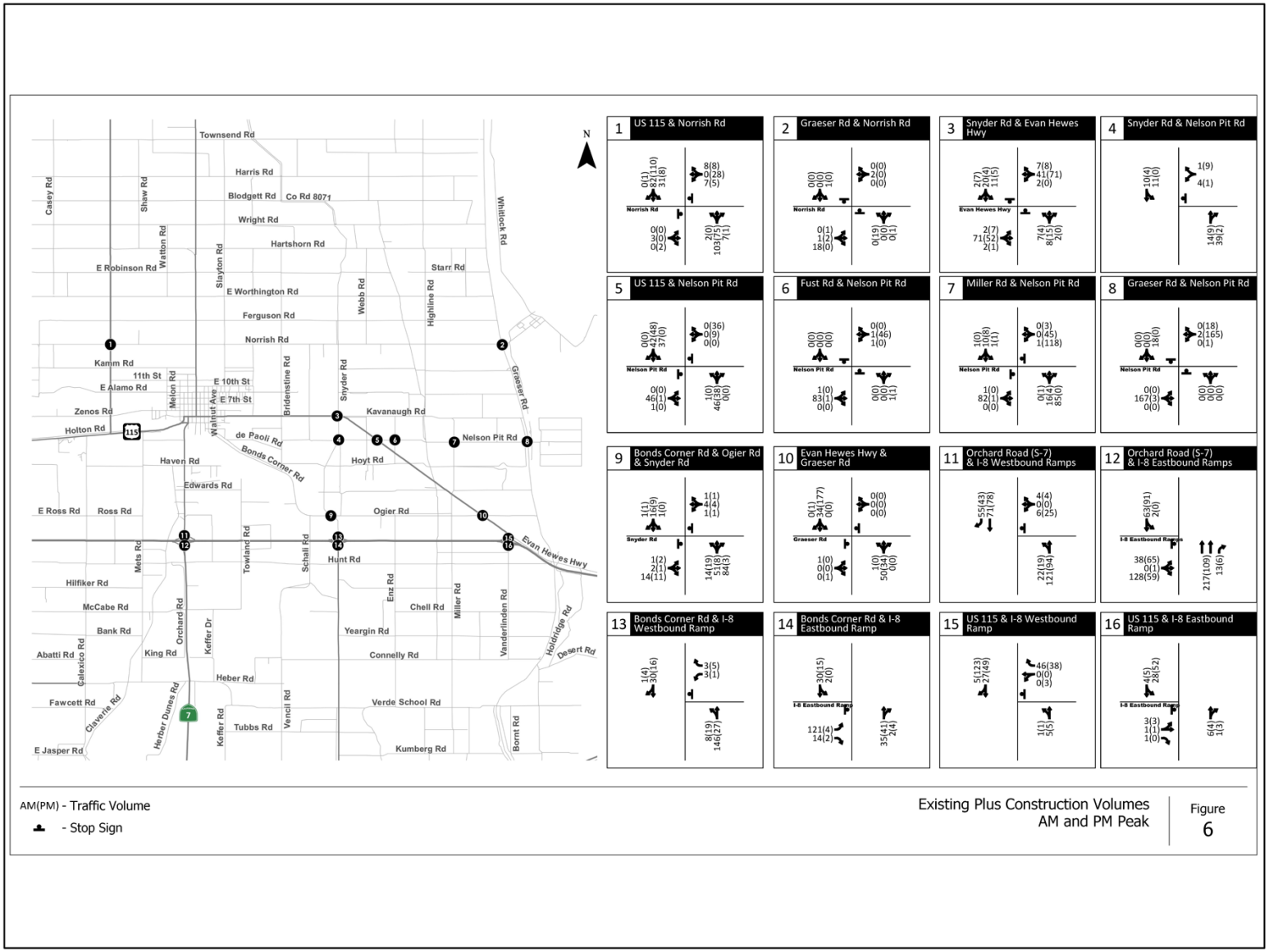
Source: Kittelson & Associates, 2022 (Appendix M).

Roadway segments were also analyzed for the Existing Plus Construction scenario. All roadway segments operate acceptably (LOS C or better) under the Existing Plus Construction scenario. In summary, construction traffic would not result in congestion and excessive delays at study intersections and roadways.

The development of the Project site would not cause a substantial increase in traffic affecting the efficiency of the circulation system; this includes all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, such as highways and freeways, pedestrian and bicycle paths, and mass transit. Thus, the impact would be less than significant and no mitigation would be required.

Impact 4.15-2: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) relative to Vehicle Miles Traveled?

As discussed previously, OPR provides screening criteria that allow small projects (from a traffic standpoint) to screen out of a detailed VMT analysis based on the number of daily trips it generates. Projects that generate fewer than 110 trips per day can be presumed to result in less than significant VMT impacts. The project would be remotely controlled. No employees would be based at the Project site. Security-related monitoring would be done remotely. Personnel may conduct



Source: Kittelson & Associates 2021

Existing Plus Construction Volumes - AM and PM Peak Hour
Vikings Solar Energy Generation Project
Figure 4.15-4

unscheduled security rounds, and maintenance workers may access the site periodically to clean the panels and maintain the equipment and project area. The public would not have access to the facility. Thus, the project will not generate more than 110 trips per day. Therefore, the project meets the small project screening criteria, and it will not have significant VMT impact.

Impact 4.15-3: 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 project does not include changes to existing roadways. 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. These access roads would not increase hazards because of design features or incompatible uses and no significant impact is identified.

Impact 4.15-4: Would the Project result in an 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). Based on this context, impacts on this issue area are considered less than significant.

4.15.4 Mitigation Measure

The Project would not result in significant transportation and traffic impacts. No mitigation is required; however the following would be added as a Conditions of Approval.

MM-TR-1: Permits, Agreements and Traffic Control Plan

Prior to the issuance of construction, grading or building permits, the Applicant shall:

a. Obtain all necessary encroachment permits for work within Imperial County road or highway R/W. Obtain all necessary Oversize/Overweight permits to operate or move a vehicle of a size or weight exceeding the maximum limitations specified in the California Vehicle Code. Copies of the approved Construction Traffic Control Plan and issued permits shall be submitted to the ICPDSD and the Imperial County DPW, prior to the commencement of construction or decommissioning activities.

b. Prepare a Haul Route Study for the proposed construction haul route to evaluate any impacts to County roads. Said study shall be submitted to the ICPDSD and the Imperial County DPW for review and approval. The haul route study shall include pictures and/or other documents to verify the existing conditions of the impacted County roads along the proposed haul route before construction begins. The haul route study shall also include recommended mitigation improvements to impacted County roads along with any fair share costs for such improvements.

c. Enter into a secured Road Maintenance Agreement with the County of Imperial, prior to the issuance of a grading permit, to ensure that any County roads that are demonstrably damaged by construction traffic are promptly repaired and, if necessary, paved, slurry-sealed, or reconstructed as per requirements of the State and/or Imperial County.

d. Prepare and submit a Construction Traffic Control Plan to Imperial County DPW-Development Review and Caltrans District 11, as appropriate, for approval. The Construction Traffic Control Plan must be prepared in accordance with both the California Department of Transportation Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook and must include, but not be limited to, the following issues:

    1. Timing of deliveries of heavy equipment and building materials;
    2. Directing construction traffic with a flag person;
    3. Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic;
    4. Ensuring access for emergency vehicles to the Project site;
    5. Temporarily closing travel lanes or delaying traffic during materials delivery, transmission line stringing activities, or any other utility connections;
    6. Maintaining access to adjacent property; and,
    7. Specifying both construction-related vehicle travel and oversize load haul routes, minimizing construction traffic during the AM and PM peak hours, distributing construction traffic flow across alternative routes to access the Project site, and avoiding residential neighborhoods to the maximum extent feasible.

e. Institute construction work hours as necessary, such that the arrival and/or departure times of workers would be staggered as necessary.

f. Identifying vehicle safety procedures for entering and exiting site access roads.

g. Submit documentation that identifies the roads to be used during construction. The Applicant shall be responsible for repairing any damage to non-County maintained roads that may result from construction activities. The Applicant shall submit a preconstruction video log and inspection report regarding roadway conditions for roads used during construction to the Imperial County PWD and the I ICPDSD.

h. Within 30 days of completion of construction, the project proponent/operator shall submit a post-construction video log and inspection report to the County. This information shall be submitted in electronic format. The County, in consultation with the Applicant's engineer, shall determine the extent of remediation required, if any.