

5.10. Transportation/Traffic

This section addresses potential transportation and traffic impacts that may result from construction, operation, closure and post-closure maintenance of the Desert Valley Company Monofill Expansion Project, Cell 4. 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/traffic was derived from the Traffic Impact Study prepared by the KOA Corporation (KOA Corporation, 2020: Appendix P).

Scoping Issues Addressed

During the scoping period for the Project, a public scoping meeting was conducted, and written comments were received from agencies. The California Department of Resources Recycling and Recovery requested that all operational activity hours be identified and analyzed in the DEIR. No other comments related to transportation or traffic were received.

Issues Scoped out as part of the Initial Study

None.

5.10.1. Environmental Setting

The Desert Valley Company (DVC) Monofill Facility is located at 3301 West Highway 86, Brawley, California, 92227. Geothermal non-hazardous waste and byproducts generated by CalEnergy geothermal power plant are weighed on scales located at the CalEnergy plants and delivered to the DVM by truck. Wastes are accepted at the monofill during normal operating hours of Monday through Sunday, 6:00 AM to 6:00 PM.

Truck haul routes used to transport the waste stream to the monofill are described on **Table 3-6** and depicted on **Figure 3-4**. The covered loads are transported from the Salton Sea area, via a designated truck haul route (Designated Route A) that includes Sinclair Road, Gentry Road, Bowles Road, Lack Road and State Routes 78 / 86 and the Monofill Access Road. The use of alternate truck routes for deliveries to the DVM (Alternate Routes “B” and “C”) also include Forrester Road and Bannister Road. In the event CalEnergy Scales are out-of-service, scales at the Double Eagle Scale and Fuel company, located at 701 N Sorensen Ave, Calipatria, would be used, and trucks would use the Alternate Route For Weighing Trailers to access the DVM. The one way distance of the haul routes range from 28 to 38 miles in length.

Each of the roadways included in the haul routes is further described below.

State Route 86/78 (SR-86/78) is a four lane divided highway and a posted speed limit of 65 miles per hour (mph). A dedicated right-turn lane and a dedicated left turn lane are provided at the entrance to the Monofill Access Road.

State Route 111 (SR-111) begins at the International Border between Mexico and the United States traveling north with two travel lanes in each direction to SR-78/Brawley Bypass. North of Brawley, SR-111 is a two lane roadway. SR-111 is considered to be the “backbone” route of Imperial County as it connects the three largest cities and acts as a major goods movement route, particularly for agricultural products and cross-border goods and services.

County Road 30 is classified as a major collector and includes Forrester Road, O Brian Road and Gentry Road. These are two lane roadways with shoulders that are well maintained by the County.

Bannister Road is a two-lane minor local collector roadway which connects State Route 86 (SR-86) east to Brandt Road. It has no median and a posted speed limit of 55 mph. No sidewalks or bicycle facilities are present on either side of the roadway. The width of the roadway is generally 24 feet.

Bowles Road, and **Lack Road** are two-lane minor collector roadways with shoulders.

Gentry Road is a two-lane north-south facility which connects Forrester Road, north of the City of Westmorland north to Eddins Road. A portion of Gentry Road from Sinclair Road to the City of Westmorland is designated a Class II bike route.

Sinclair Road is a two-lane east-west facility which connects Gentry Road to SR 111. A portion of Sinclair Road from SR-111 to Gentry Road is designated as a Class II bike route.

Airports

The Salton Sea Airport, located approximately 13 miles northwest the Project site, is the nearest public airport.

Transit Service

Imperial Valley Transit (IVT) is a fixed route public bus service created in 1989. It began operations as a five (5) route system and as of 2020 had 12 routes and over 20 buses in operation. While the IVT offers bus services along several roads included in the Designated and Alternate haul routes, no transit services is provided in the immediate vicinity of the Project site.

Bicycle and Pedestrian Facilities

No bike lanes are provided along any of the designated haul routes. However, Gentry Road and Sinclair Road are designated as Class II bike routes.

5.10.2. Regulatory Setting

State

California Department of Transportation

The California Department of Transportation (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

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 Levels of Service (LOS). The legislation established that once new guidelines were certified 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 are allowed 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 VMT as the most appropriate measure of transportation impacts, and shifting away from LOS, the primary elements of this section are as follows:

- Reiterates that a project's adverse effect on automobile delay shall not constitute a significant environmental impact;
- Creates 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;
- Allows a lead agency to qualitatively evaluate VMT if existing models are not available; and

- Gives 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 with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the State Office of Planning and Research published a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), to provide guidance in the calculation and application of VMT analyses within CEQA documents.

Local

The Imperial County General Plan Circulation and Scenic Highways Element (CSHE) is intended to provide a plan to accommodate a pattern of concentrated and coordinated growth, providing both, regional and local linkage systems between unique communities, and its neighboring metropolitan regions while protecting and enhancing scenic resources within both rural and urban scenic highway corridors. The CSHE policies related to the proposed Project are outlined below. **Table 5.10-1** 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 5.10-1: CONSISTENCY WITH GENERAL PLAN
TRANSPORTATION GOALS AND OBJECTIVES**

General Plan Policies and Objectives	Consistency	Analysis
Circulation and Scenic Highways Element (CSHE)		
<p>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.</p> <ul style="list-style-type: none"> • CSHE Objective 1.2 Require a traffic analysis for any new development which may have a significant impact on County roads. • CHSE Objective 1.12 Review new development proposals to ensure that the proposed development provides adequate parking and would not increase traffic on existing roadways and intersection to a level of service (LOS) worse than “C” without providing appropriate mitigations to existing infrastructure. 	<p>Yes</p>	<p>A Traffic Impact Report has been prepared (Appendix P) which demonstrates that the proposed Project would not cause existing roadways or intersections to operate below a Level of Service “C”.</p> <p>Additionally, the proposed expansion of the monofill would be located adjacent to the existing monofill and would not affect the waste generation location, volume or haul routes. For this reason, no increase in VMTs, over existing levels, would occur.</p> <p>Traffic impacts would not be significant. No mitigation is required.</p>

Source: County of Imperial Circulation and Scenic Highway Element, 2019.

5.10.3. 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 KOA Corporation (KOA Corporation, 2020: Appendix P). The analysis considers potential changes in existing LOS based on peak hour and average daily traffic volumes and provides an analysis of site operation and site construction in order to describe the traffic volumes associated with the construction, operation, post-closure maintenance of Cell 4A and Cell 4B.

The existing Solid Waste Facility permit (Permit No. 13-AA-0022) and Conditional Use Permit (No. 05-0020) limit the type of waste that can be accepted at the monofill, the maximum number of daily truck deliveries, the daily and annual volumes of non-hazardous geothermal wastes and byproducts that can be accepted at the landfill, the approved haul routes. The SWFP also specifies the monofill's hours and days of operation. Specifically:

- The waste stream accepted at the DVCM is limited to geothermal filter cake, drilling mud materials and cuttings, soils containing geothermal materials from CalEnergy geothermal plants along with incidental plastic sheeting used as truckbed liners by the waste transport trucks.
- The number of daily truck deliveries are limited to 38 waste transporting trucks per day.
- The volumes of non-hazardous wastes that can be received is limited to a maximum of 750 tons per day and 273,750 tons annually.
- The permitted hours and days of operation are limited to 6:00 AM to 6:00 PM, Monday through Sunday.
- Vehicles carrying waste exit off Highway 86 and travel 1.25 miles south off the highway to the Monfill site. Truck travel to and from the facility shall only occur on approved routes. The truck lights are to remain on at all times while in motion.

None of these features would be changed under the proposed Project. For this reason, the traffic analysis evaluated potential impacts based on the generation of up to 38 waste transporting truck trips/day and up to 4 trips for employees and vendors (or 38 one-way trips). Changes in LOS were then compared to LOS thresholds set by Imperial County Public Works.

Level of Service Approach

Level of Service (LOS) is the term used to denote the different operating conditions that occur on a given roadway segment or intersection under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis, taking into account factors such as roadway geometries, signal phasing, travel speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS designation is reported differently for unsignalized intersections, signalized intersections, street segments, and freeways. The following describes the LOS designations for a state highway.

State Highway Level of Service (LOS) and performance is based upon procedures developed by Caltrans District 11 that are derived from the 2000 State Highway Capacity Manual. The procedure for calculating freeway LOS involves estimating a peak hour volume to capacity (V/C) ratio. Peak hour volumes are estimated from the application of design hour (K), directional (D) and heavy vehicle factors to ADT volumes. The resulting V/C is then compared to acceptable ranges of V/C values corresponding to the various LOS for each facility classification as shown on **Table 5.10-2**. The corresponding LOS represents an approximation of existing or anticipated future freeway operating conditions in the peak direction of travel during the peak hour. LOS C or better is used in this EIR as the threshold for acceptable freeway operations based upon Caltrans and County of Imperial requirements.

TABLE 5.10-2: STATE HIGHWAY SEGMENT LEVEL OF SERVICE DEFINITIONS

LOS	V/C	Congestion/ Delay	Traffic Description
"A"	< 0.41	None	Free flow.
"B"	0.42-0.62	None	Free to stable flow, light to moderate volumes.
"C"	0.63-0.80	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
"D"	0.81-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
"E"	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
"F"	< 1.00	Considerable	Forced or breakdown flow. Delay measured in average travel speed (MPH). Signalized segments experience delays >60.0 seconds/vehicle.

Source: KOA, 2020 (Appendix P).

Table 5.10-3 summarizes LOS criteria for unsignalized intersections using the Chapter 17 methodology of the 2000 Highway Capacity Manual.

TABLE 5.10-3: LEVEL OF SERVICE CRITERIA - UNSIGNALIZED INTERSECTIONS

Average Control Delay (sec/veh)	Level of Service (LOS)
<10	A
>10 and <15	B
>15 and <25	C
>25 and <35	D
>35 and <50	E
>50	F

Source: KOA, 2020 (Appendix P).

Trip Generation

Trip generation associated with current operations of the monofill are presented on **Table 5.10-4**. During operations of the DMV, there would be 198 passenger car equivalents (PCE) traveling to and from the monofill, which includes trips resulting from waste truck trips and waste storage workers (on-site employees). As shown on **Table 5.10-4**, operation of the DMV results in 25 PCE trips during AM and PM peak hours respectively. Waste disposal trucks would be required to use the designed or alternate haul routes identified on **Table 3-4**.

TABLE 5.10-4: TRIP GENERATION – OPERATIONS (DAILY & PEAK HOUR)

Source	No.	Unit	Daily Rate ⁽¹⁾	Daily Round Trips (PCE)		AM Peak Hour			PM Peak Hour		
						Total	In	Out	Total	In	Out
Waste Storage Workers	4	Employee	2	8	Rate	1.00	100%	0%	1.00	0%	100%
					Trips	4	4	0	4	0	4
Waste Truck trips	38	Truck	2	190	Rate	0.11	50%	50%	0.11	50%	50%
					Trips	21	11	11	21	11	11
TOTAL				198	Trips	25	15	11	25	11	15

Notes:

PCE Passenger Car Equivalent– One truck is equivalent to 2.5 passenger cars.

Source: KOA, 2020 (Appendix P).

During construction of Cell 4A or Cell 4B, the traffic analysis assumed that 25 construction workers would be required per day during construction of Cell 4A and during construction of Cell 4B, and five (5) daily equipment deliveries (**Table 5.10-5**). This results in a total of 63 PCE trip ends with 26 PCE trips occurring during the AM and PM peak hours, respectively.

TABLE 5.10-5: CONSTRUCTION TRIP GENERATION (DAILY & PEAK HOUR)

Source	No.	Unit	Daily Rate ⁽¹⁾	Daily Round Trips (PCE)		AM Peak Hour			PM Peak Hour		
						Total	In	Out	Total	In	Out
Peak Construction Workers	25	Employee	2	50	Rate	1.00	100%	0%	1.00	0%	100%
					Trips	25	25	0	25	0	25
Equipment Deliveries & Construction Truck Trips (PCE)	5	Truck Trips/Day	1	13	Rate	0.13	75%	25%	0.13	25%	75%
					Trips	1	1	0	1	0	1
TOTAL				63	Trips	26	26	0	26	0	26

Notes:
 PCE Passenger Car Equivalent– One truck is equivalent to 2.5 passenger cars.
 Source: KOA, 2020 (Appendix P).

Disposal operations at Cell 3 would be on-going during the construction of Cell 4A. Likewise, disposal operations at Cell 4A would be on-going during construction of Cell 4B. For this reason, the traffic analysis estimated total trips, during construction and operations (**Table 5.10-6**). As shown on **Table 5.10-6**, during that period when operations and construction of either Cells 4A or Cell 4B would occur, a total 261 PCE trips, and 51 PCE peak hour trips are anticipated.

TABLE 5.10-6: TOTAL TRIPS TO THE SITE (CONSTRUCTION + OPERATIONS)

Source	Daily Round Trips (PCE)	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out
Existing Operational Trips	198	25	15	11	25	11	15
New Construction Trips	63	26	26	0	26	0	26
TOTAL	261	51	41	11	51	11	41

Notes:
 PCE Passenger Car Equivalent– One truck is equivalent to 2.5 passenger cars.
 Source: KOA, 2020 (Appendix P).

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.

Impact 5.10-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Traffic operations for the entrance to the site from SR 86/78 were analyzed for the construction years of 2023 and 2050. In order to reflect pre-COVID-19 traffic conditions, the traffic analysis used traffic count data from the Caltrans 2018 traffic census and the existing monofill’s traffic generation to estimate turning movements to and from the site driveway.

Construction of Cell 4A - Construction Year 2023

This discussion documents the addition of construction traffic for Cell 4A plus existing operations onto year 2023 conditions to document the scenario with both construction of Cell 4A and operations of Cell 3 occurring simultaneously. An annual ambient growth of 2.0% was utilized to account for traffic growth between the year of traffic counts (2018) and the construction year of 2023. The segment analysis was completed for the segment of SR 86/78 at the site entrance. The intersection analysis was completed at the intersection of the site drive and SR 86/78. As shown on **Table 5.10-7**, the temporary addition of project traffic associated with construction of Cell 4A would not reduce the level of service of street segments or intersections. Impacts would not be significant and no mitigation would be required.

**TABLE 5.10-7: NEAR-TERM ROADWAY SEGMENT OPERATIONS
(CELL 3 OPERATIONS + CELL 4A CONSTRUCTION – YEAR 2023)**

Roadway Segment	Operations of Cell 3 (without Cell 4A Construction)			Operations of Cell 3 + Cell 4A Construction			Net Change V/C ^(a)	Sign. ?
	ADT ⁽¹⁾	LOS ⁽²⁾	V/C ⁽³⁾	ADT	LOS	V/C		
SR 86	15,102	A	0.26	15,075	A	0.26	0.00	No

Notes:

(1) ADT = Average Daily Traffic Volumes

(2) LOS = Level of Service

(3) V/C = Volume ÷ Capacity

Sign.? = Significant?

Source: KOA, 2020 (Appendix P).

Construction of Cell 4A (Construction Year 2050)

Tables 5.10-8 and **5.10-9** document traffic conditions when Cell 4A is operational and Cell 4B is under construction. The analysis assumed that Cell 4A would be operational by 2024 and would have an approximately 28 year life span. Thus, Cell 4A would reach capacity by 2052 would cease receiving waste. Because construction of Cell 4B is proposed to commence two (2) years prior to the closure of Cell 4A, the analysis assumes that construction of Cell 4B would commence in the Year 2050. An annual ambient growth of 2.0% was utilized to account for traffic growth between the year of traffic counts (2018) and the year when Cell 4 B would be constructed (Year 2050). The intersection analysis was completed at the intersection of the Project site entrance and SR 86/78. The segment analysis is shown in **Table 5.10-8** and intersection analysis in **Table 5.10-9**.

As shown on **Tables 5.10-8** and **5.10-9**, once Cell 4A is operational, the temporary addition of project traffic associated with construction of Cell 4B would not reduce the level of service of street segments or intersections. Future roadway and intersection impacts would not be significant and no mitigation would be required.

**TABLE 5.10-8: FUTURE ROADWAY SEGMENT OPERATIONS
(CELL 4A OPERATIONS + CELL 4B CONSTRUCTION – YEAR 2040)**

Street Segment	Operations of Cell 4A (without Cell 4B Construction)			Operations of Cell 4A + Cell 4B Construction			Net Change V/C ^(a)	Sign. ?
	ADT	LOS	V/C	ADT	LOS	V/C		
SR 86	21,489	A	0.38	21,552	A	0.38	0.00	No

Notes:

(1) ADT = Average Daily Traffic Volumes

(2) LOS = Level of Service

(3) V/C = Volume ÷ Capacity

*As shown in Imperial County Circulation and Scenic Highways Element (2008) and Imperial County Long Range Transportation Plan 2013 Update.

Source: KOA, 2020 (Appendix P).

**TABLE 5.10-9: FUTURE INTERSECTION OPERATIONS
(CELL 4A OPERATIONS + CELL 4B CONSTRUCTION - YEAR 2040)**

Scenario	Intersection	Control	AM Peak Hour				PM Peak Hour			
			NB		WB LT		NB		WB LT	
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Delay (a)	LOS (b)	Delay (a)	LOS (b)
Operations of Cell 4A (without Cell 4B Construction)	Site Driveway/ SR 86	SSS	18.1	C	12	B	14	B	9.8	A
Operations of Cell 4A + Cell 4B Construction	Site Driveway/ SR 86	LT	12.3	B	13.2	B	16.4	C	9.8	A

Notes:

(a) = Average delay expressed in seconds per vehicle

(b) = LOS = Level of Service

NB = North Bound

WB LT = Westbound Left Turn

SSS = Side Street Stop

LT = Uncontrolled left turn

Source: KOA, 2020 (Appendix P).

In summary, implementation of the proposed Project would add traffic to roadway segments and intersections along the project haul routes during construction and operation. However, the additional traffic would not result in an exceedance of LOS C. Additionally, the proposed Project would not affect bicycle facilities, pedestrian facilities or public transit. Therefore, no conflicts with

the Imperial County General Plan Circulation and Scenic Highways Element would occur. Impacts would not be significant.

Impact 5.10-2: Conflict(s) or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b) relative to Vehicle Miles Traveled

The current Solid Waste Facility Permit for the DVCM (13-AA-0022) and Conditional Use Permit (No. 05-0020) allows up to 38 waste transporting vehicles per day for incoming waste materials from the CalEnergy Geothermal plants. The Project does not propose to increase the number of allowable daily vehicle trips nor does not propose to increase the daily or annual volumes of waste that can be received above the 750 daily tons or 273,750 annual tons limit identified in the permits. Additionally, the proposed Project would not substantially increase the number of on-site personnel over existing conditions. As shown on **Table 3-4**, the proposed Project would utilize the designated and alternate haul routes approved for the existing monofill. Depending on which haul routes are used, the one-way distance of the haul routes range from 28 to 38 miles in length. Assuming the longest haul route is used, the waste delivery trucks would generate 608 vehicle miles traveled (VMT) per day (38 waste transporting trucks x 38 miles x 2 = 608 miles). Given that operations of the proposed expansion would not increase the daily number of vehicle trips nor the daily or annual volume of waste that could be received at the expanded landfill, no increase in VMT would result. A slight increase in VMT would occur during construction of Cells 4A or 4B from construction workers commuting to the site and equipment/material deliveries; however, these increases would be temporary and would cease upon completion of construction. It should also be noted that SB 743 focuses on land use and transportation projects and does not consider temporary construction trips.

With the exception of temporary construction trips, the proposed Project would not increase miles traveled and would result in a less than significant transportation impact.

Impact 5.10-3: 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 include the expansion of the existing monofill via the construction and operation of a new waste cell (Cell 4). Waste disposal trucks, similar to those that are currently being used for waste disposal at the existing monofill would continue to be used to haul geothermal waste to the Project site. No increase in the number of daily waste disposal trucks would be required. While implementation of the Project would require the installation of a new internal access road to access Cell 4B; this improvement would be located within the fence line of the monofill. No off-site roadway improvements would be required.

Therefore, the Project would include no hazardous design features, such as sharp curves or dangerous intersections, that would create a traffic hazard. As a result, impacts related to the increase of traffic hazards as a result of the Project would be less than significant. No mitigation measures are required.

Impact 5.10-4: Inadequate Emergency Access.

The Project would not block any major thoroughfares and would not result in inadequate emergency access to the monofill. Waste haul trucks would continue to use the designated and alternative truck haul routes approved in the *Addendum to the Final EIR for the Desert Valley Company, SCH No. 1989032206* (County of Imperial, 2008a). No impact is anticipated.

5.10.4. Mitigation Measures

The Project would not result in significant transportation/traffic impacts. No mitigation is required.