4.16 TRANSPORTATION/TRAFFIC

4.16.1 Regulatory Setting

This section presents a description of the laws, policies, and plans relevant to transportation and traffic.

California Department of Transportation

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

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a joint powers authority that was established in 1965. Federally, SCAG is a Metropolitan Planning Organization; under State law it is a Regional Transportation Planning Agency and a Council of Governments. SCAG includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG's responsibilities include developing long-range regional transportation plans, including the consideration of sustainable growth, growth forecasting, housing needs, and transportation improvement (SCAG 2014).

Imperial County Transportation Commission

The Imperial County Transportation Commission (ICTC) was established under Senate Bill 607 (SB 607 - Ducheny) which was approved by the California Legislature and Governor Arnold Schwarzenegger in 2009. ICTC member agencies, as a part of a county transportation commission, are enabled to exercise basic initiative and leadership in the transportation planning and programming process. The ICTC will act in accordance with all applicable laws and statutes for County transportation commissions. ICTC body will guide the development of the Regional Transportation Plan for the Imperial region and its regional, State, and federal transportation improvement programs (TIPs) and their updates, including, but not limited to: the distribution and oversight of Local Transportation Fund monies; the preparation and submittal of applications for transportation-related funds; approval of the allocation of and claims for Transportation Development Act funds; the planning, programming, and administration of regional transit services; and encourage active citizen participation in the development and implementation of various transportation-related plans and programs.

County of Imperial General Plan

The *Circulation and Scenic Highways Element* of the County of Imperial General Plan provides information about the transportation needs of Imperial County and provides guidance to meet these needs and to facilitate regional transportation coordination. While this Programmatic EIR analyzes the proposed Project's consistency with the General Plan pursuant to CEQA Guidelines, Section 15125(d), the Imperial County Board of Supervisors ultimately determines consistency with the General Plan.

Objectives noted in the *Circulation and Scenic Highways Element* include:

Objective 1.2: Require a traffic analysis for any new development which may have a significant impact on County roads. A traffic analysis may not be necessary in every situation, such as when the size or location of the project will not have a significant impact upon and generate only a small amount of traffic. Also, certain types of projects, due to the trip generation characteristics, may add virtually no traffic during peak periods. These types of projects may be exempt from the traffic analysis requirements. Whether a particular project qualifies for any exemption will be determined by the Department of Public Works Road Commissioner.

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. This can include fair share contributions on the part of developers to mitigate traffic impacts caused by such proposed developments.

4.16.2 Existing Environmental Setting

Roads

As described in the Imperial County *Circulation and Scenic Highways Element* (ICPDS 2008d) and the Imperial County 2013 Transportation Plan (ICTC 2013), the regional roadway network consists of one interstate route (I-8), seven State routes (SR-7, SR-78, SR-86, SR-98, SR-111, SR-115, and SR-186), and several regionally significant arterials. Additionally, three international Ports of Entry (POEs) between the United States and Mexico are within the Imperial County limits: Calexico, Calexico East, and Andrade (ICTC 2013). Figure 4.16-1 shows the major roadways in Imperial County. Table 4.16-1 presents the existing road conditions.

State Routes

Interstate 8 (I-8) is the primary east-west route through Imperial County and runs for 172 miles from San Diego, California, to Yuma, Arizona. With two travel lanes, it spans 79 miles within Imperial County. From the west it connects to the western end of SR-98. In Imperial County, it intersects with SR-86, SR-111 (access to the international POE at Calexico), SR-7, and SR-115 and then reconnects to SR-98 at its eastern end. It also accesses the SR-186 connection to the Andrade POE. It serves regional, cross-border, and interstate traffic and provides access to desert recreational areas. The Average Daily Traffic (ADT) volumes on I-8 are approximately 19,600 ADT west of Imperial Avenue and 16,600 ADT east of SR-111. In the area of El Centro between Imperial Avenue and SR-111, the volumes reach a maximum of approximately 37,500 ADT (ICTC 2013).

State Highway 98 (SR-98) is a 56.9-mile east-west route that is entirely contained within Imperial County. It traverses the southern portion of Imperial Valley parallel to I-8 and the U.S./Mexico International Border. It begins at I-8 near Ocotillo, intersects SR-111 and SR-7, and terminates at I-8 near Midway Well. It is mostly two lanes with the exception of having four lanes through portions of the City of Calexico. It serves as an alternate route to I-8, providing access to many agricultural areas in the eastern part of the region, and is used for cross-border traffic.

State Highway 78 (SR-78) is an 81.8-mile east-west route that crosses Imperial County from the San Diego County line to the north junction of SR-86, where it then merges and becomes SR-86 for 24 miles, and then becomes SR-78 again to the Riverside County line. It is typically a two-lane conventional

highway except for where it is co-designated SR-86, where it was upgraded to a four-lane expressway or four-lane conventional highway.

State Highway 86 (SR-86) is a 90.8-mile north-south route serving Imperial and Riverside counties. It begins at SR-111 near the U.S./Mexico International Border and extends northward (roughly parallel to SR-111) along the western shore of the Salton Sea, where it ends at Avenue 46 in the City of Indio. It is a two-lane road in Imperial County and ends at the Riverside County line as a four-lane expressway. It intersects several State routes, including I-8 and SR-78 (where it shares the 24-mile alignment) and continues north to cross the Imperial County/Riverside County line, intersecting SR-195 and SR-111.

State Highway 111 (SR-111) runs north from the downtown Calexico POE for 64 miles except for a 1.2-mile break within Brawley, where it shares an alignment with SR-78. From the Calexico POE to SR-98, it functions primarily as a city street and provides access to many local businesses.

State Highway 7 (SR-7) is a 6.7-mile north-south route from the Calexico East POE to I-8. It is a four-lane highway with access control at the Calexico East POE, SR-98, and direct access to I-8 for the movement of international commercial goods.

State Highway 115 (SR-115) is a 33.6-mile north-south route that begins at the junction with I-8 east of Holtville and ends at the junction with SR-111 in Calipatria. It includes a segment that shares alignment with SR-78, and it is typically a two-lane conventional highway with some short four-lane segments. It serves as an alternate route to SR-86 and SR-111 and is important in facilitating the movement of interregional agricultural goods and intraregional travel between various cities within the County.

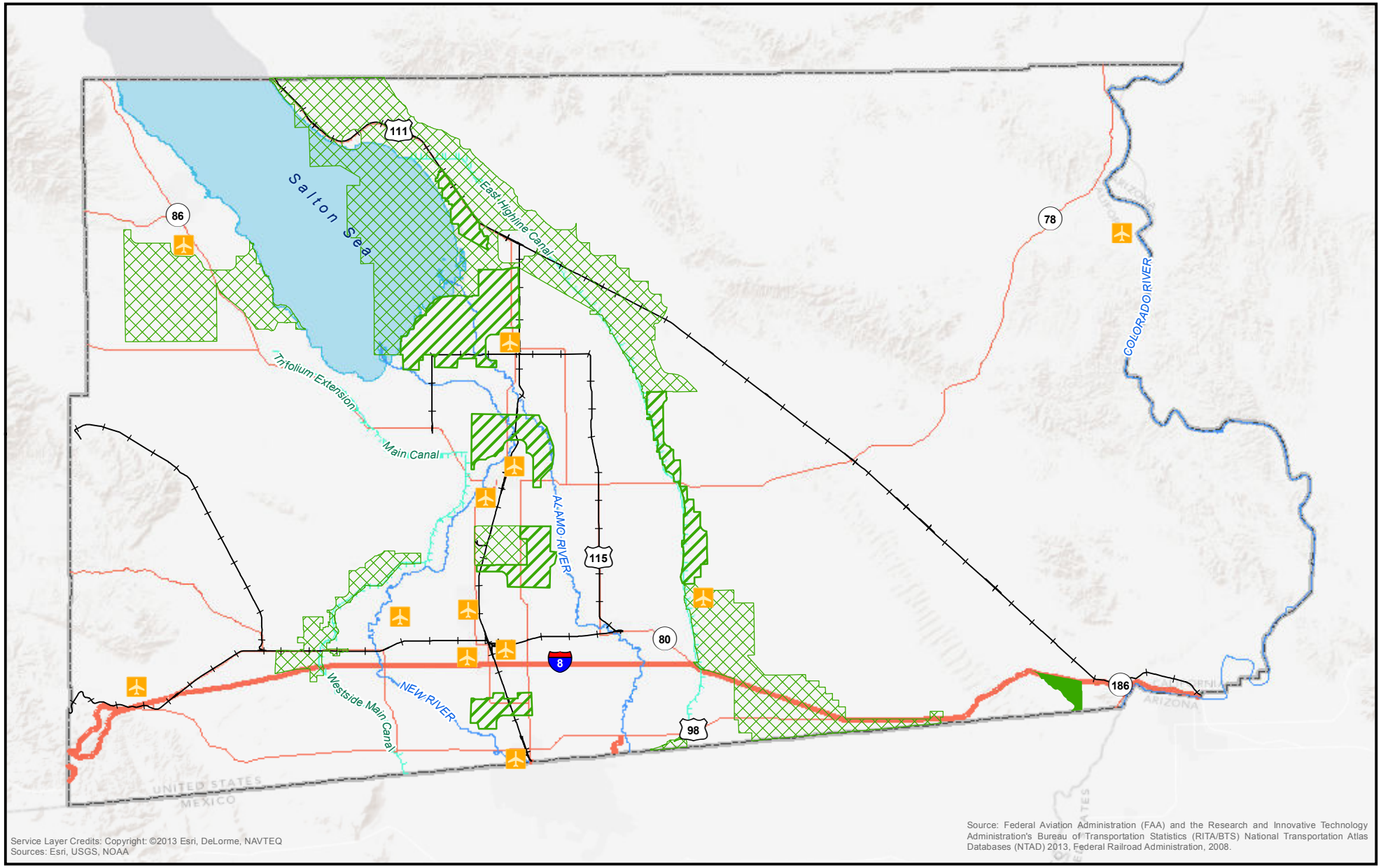
State Highway 186 (SR-186) is a 2.1-mile north-south route from the Andrade POE in the east and connects to the interchange with I-8. It is constructed as a two-lane conventional highway accommodating international and commercial travel.

Regional Arterials

The regional roadway system also features several important arterials that generally run in either an east-west or north-south orientation. The important north-south arterials (listed from west to east) include: Forrester Road, Austin Road, Imperial Avenue, and Dogwood Road. The important east-west arterials (listed from south to north) include: Jasper Road, Heber Road, McCabe Road, Ross Road, Evan Hewes Highway, Aten Road, Worthington Road, and Keystone Road.

Scenic Highways

No designated state scenic highways occur in Imperial County; however, portions of I-8, SR-78, SR-111, and Borrego-Salton Seaway within Imperial County are considered eligible for State Scenic Highway Designation. Each of these highways are described in greater detail in Section 4.1.2.



Service Layer Credits: Copyright: ©2013 Esri, DeLorme, NAVTEQ
Sources: Esri, USGS, NOAA

Source: Federal Aviation Administration (FAA) and the Research and Innovative Technology Administration's Bureau of Transportation Statistics (RITA/BTS) National Transportation Atlas Databases (NTAD) 2013, Federal Railroad Administration, 2008.

Legend

Major Roadways

- Primary Roads
- Secondary Roads
- Railroads
- Airport

N

0 5 10 20

Miles

Figure 4.16-1

Imperial County Renewable Energy and Transmission Element Update PEIR
Major Roadways, Railroads, and Airports

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Date Saved: 11/20/2014, Author: msimmons

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Table 4.16-1: Existing Road Conditions

Segment	Direction	Limits	Capacity at LOS C	Existing	
				ADT	LOS
State Routes					
SR-111	N-S	From Northern Calexico City Limits to International Border	29,600	28,500	B
SR-111	N-S	From I-8 to SR-98	40,000	33,500	B
SR-111	N-S	From SR-78 to I-8	40,000	17,300	A
SR-111	N-S	North of Brawley City Limits	7,100	8,800	D
SR-111	N-S	From Riverside County Line to Wilkinson Road	7,100	1,600	A
SR-115	N-S	From Evan Hewes Highway to I-8	7,100	6,100	C
SR-115	N-S	From SR-78 to Evan Hewes Highway	7,100	5,100	C
SR-115	N-S	From SR-111 to SR-78	7,100	4,600	C
SR-7	N-S	From I-8 to King Road	40,000	4,900	A
SR-186	N-S	From I-8 to the International Border	7,100	8,500	D
SR-78	E-W	From the Riverside County Line to SR-115	7,100	3,500	B
SR-78/115	E-W	From SR-78 East to SR-111	7,100	4,600	C
SR-78/86	E-W	From western Brawley City Limits to Lack Road	29,600	17,500	B
I-8	E-W	From SR-111 to Forrester Road	60,000	34,500	B
SR-98*	E-W	From SR-7 to SR-111	7,100	23,000	F+
SR-98	E-W	From SR-111 to Dogwood Road	7,100	8,200	D
Local Roads					
Forrester Road	N-S	From SR-78/86 to McCabe Road	7,100	8,800	D
Austin Road	N-S	From SR-86 to McCabe Road	7,100	3,300	B
Imperial Avenue	N-S	From Adams Avenue to I-8	29,600	27,800	C
Imperial Avenue	N-S	From Aten Road to I-8	29,600	38,400	F
8th Street	N-S	From Ross Avenue to Wake Avenue	7,100	9,500	D
Dogwood Road	N-S	From Southern El Centro City Limits to McCabe Road	7,100	15,000	E
Dogwood Road	N-S	From Mead Road to SR-98	7,100	15,000	E
Bowker Road	N-S	From Evan Hewes Highway to Cole Road	7,100	1,400	A
Keystone Road	E-W	From SR-115 to Forrester Road	7,100	3,000	B
McCabe Road	E-W	From SR-111 to Austin Road	7,100	1,500	A
Jasper Road	E-W	From SR-7 to SR-111	7,100	100	A
Source: ICTC 2013					

Ports of Entry

Three international Ports of Entry (POEs) between Baja California, Mexico, and California are within the Imperial County limits: Calexico, Calexico East, and Andrade international POEs (ICTC 2013).

The downtown Calexico POE provides access to the Municipality of Mexicali, the capital of Baja California Norte, and is the second busiest California border crossing. It is dedicated to passenger vehicles, rail, and pedestrian inspections. It serves nearly 21,000 passenger vehicles and 20,000 pedestrians entering the U.S., comprised of mostly day-trippers including workers, students, and shoppers.

The Calexico East POE is located about 7 miles east of the downtown Calexico POE. This border crossing serves automobile, pedestrian, and bus traffic as well as the being the second busiest crossing for commercial vehicles along the California/Mexico Border.

The Andrade POE, located further east near the Arizona state border, provides a smaller entry to Mexico. This border crossing is largely dedicated to serving U.S. pedestrians who visit Mexico for the numerous medical-related facilities in the adjacent community of Algodones.

Portions of the transportation network in the greater Calexico area and specifically near the Calexico POE are currently operating at a poor level of service, which creates significant negative impacts on the economy of the local community. The community is negatively impacted by traffic congestion and delay, primarily along Imperial Avenue (SR-111) and SR-98. Furthermore, the projected growth in the El Centro-Calexico urban area and significant increase in border crossings are expected to worsen the situation.

Public Transit Program

In 1989, bus service began with Imperial County Transit operating three vehicles on five weekday-only routes within the Imperial Valley. Since then, service has increased to 19 vehicles (14 operating on fixed routes); and ridership has grown from an average of 3,000 to 52,000 passengers per month.

Public transit service in Imperial County includes the following:

- Fixed route service, including intercity routes connecting most Imperial Valley communities, is operated as Imperial Valley Transit (IVT), by First Transit, Inc.

- Urban circulator services, currently comprising the IVT Blue and Green Lines in El Centro, which have timed connections with the intercity IVT routes. These routes are also operated by First Transit, Inc. as a part of Imperial Valley Transit but are specially branded.

- Fixed route and ADA paratransit service in eastern Imperial County is provided by Yuma County Intergovernmental Public Transportation Authority (YCIPTA) in partnership with Quechan Indian Tribe and is operated by First Transit, Inc. and branded Yuma County Area Transit (YCAT).

- ADA complementary paratransit service, branded IVT Access, is operated throughout the IVT service area covering most of the Imperial Valley and is also operated by First Transit, Inc.

- Limited paratransit service, branded Med-Express, operates between designated locations in Brawley, El Centro, and Calexico and medical facilities in San Diego County. This service is operated by ARC – Imperial Valley.

- Dial-a-Ride service provides curb-to-curb transit service in five defined areas, including El Centro, Calexico, Brawley, Imperial, and the West Shores area (west side of the Salton Sea). Service in Calexico is operated by First Transit, Inc.; service in El Centro, Imperial, and the West Shores area is operated by ARC – Imperial Valley; and service in Brawley is operated by Sunrise Driving Services. Service in Brawley and the West Shores area is available to the general public; in El Centro, Calexico, and Imperial it is limited to seniors and persons with disabilities.

Railroads

All of the rail service in Imperial County is for freight only. The Union Pacific Railroad, formerly called the Southern Pacific Railroad main line, enters the eastern border near Winterhaven and then bears northwest and leaves the County just east of the Salton Sea. This line serves the Los Angeles area and northward in California and the balance of the U.S. eastward. A branch line from this main line at Niland provides rail service to Calipatria, Brawley, Imperial, El Centro, Calexico, and Mexico. Another branch line of the Union Pacific, the Holton Interurban Railroad, provides service to east El Centro. The San Diego and Arizona Eastern Railroad, also a subsidiary of the Union Pacific Railroad, runs between El Centro and San Diego. It presently provides rail service only between El Centro and the U.S. Gypsum plant in Plaster City. Pacific Imperial Railroad, Inc. (PIR) signed a 99-year lease with San Diego and Arizona Eastern Railway Company (SD&AE) and San Diego Metropolitan Transit System (MTS) in December 2012 to rehabilitate and use the Desert Line to service the Tijuana-Tecate region of Baja California, Mexico, and eastern San Diego County.

Airports

The primary public-use airports in Imperial County include the Imperial County Airport located in the City of Imperial; Brawley Municipal Airport in northeast Brawley; Cliff Hatfield Memorial Airport located in Calipatria; Holtville Airport located 7 miles northeast of Holtville; Salton Sea Airport in Salton City; the Calexico International Airport located west of Calexico; and the U.S. Naval Air Facility located 6 miles west of El Centro. Several other private airstrips are located throughout Imperial County serving principally crop dusting operations (ICPDS 2008d).

4.16.3 Significance Criteria

The thresholds for significance of impacts for the analysis are based on the environmental checklist in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines. Consistent with the CEQA Guidelines and the professional judgment of the County's staff and environmental consultants, the proposed Project would result in a significant impact on the environment if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit

- Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the County congestion/management agency for designated roads or highways

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks

- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

- Result in inadequate emergency access

- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance or safety of such facilities

4.16.4 Impacts and Mitigation

TRA-1: Conflict with an applicable plan, policy, or ordinance establishing measures of effectiveness for the performance of a circulation system or conflict with an applicable congestion management program

Construction

Construction and decommissioning of future renewable energy facilities associated with the proposed Project could result in an increase in traffic due to vehicles transporting construction materials and personnel, which could decrease the level of service on roadways and highways during the construction phase; however, estimates of traffic and congestion impacts cannot be calculated at this time. The proposed Project would be implemented on a "project-by-project" basis based on the County's approval of individual renewable energy projects. Because the proposed Project only identifies areas that would be suitable for renewable energy facilities and does not contain specific development proposals, estimates of construction-related traffic that may occur at any one time are speculative and cannot be accurately determined at this stage in the planning process. Consequently, it is not possible to quantitatively analyze whether the proposed Project would conflict with an applicable plan, policy, or ordinance establishing measures of effectiveness for the performance of a circulation system or conflict with an applicable congestion management program. Nevertheless, development of renewable energy facilities in the future within the proposed overlay zones may have the potential to conflict with congestion management programs or circulation effectiveness plans and could result in a significant impact.

Operation

Operation of renewable energy facilities associated with the proposed Project would generate traffic due to operations and maintenance activities. Impacts to local roadways and highways from project-related traffic during operations would be less than traffic generated during construction, as fewer trips would be required. As described under the analysis for construction impacts, the proposed Project would be implemented on a "project-by-project" basis based on County approval of individual renewable energy projects. Therefore, estimates of traffic impacts on circulation systems or conflicts with the applicable congestion management plan cannot be calculated at this time. Nevertheless, operation of future renewable energy facilities developed under the proposed Project may have the

potential to conflict with congestion management programs or circulation effectiveness plans and could result in a significant impact.

Mitigation Measures

Mitigation Measures TRA-1a through TRA-1d and TRA-4a through TRA-4c are based on measures presented in the DRECP EIR/EIS. Furthermore, additional mitigation may be developed during environmental evaluation of specific renewable energy projects developed in the future.

TRA-1a: Implement a transportation plan. Project proponents shall prepare a transportation plan for implementation during all phases of future renewable energy facilities developed under the proposed Project. The transportation plan shall address methods for reducing construction worker traffic volumes and project-related equipment and materials transport by implementing the following strategies: (1) provide a construction worker rideshare program; (2) schedule shift changes and deliveries to avoid conflict with peak-hour traffic patterns; (3) establish traffic controls for transport of facility hazardous and nonhazardous materials, components, main assembly cranes, and other large pieces of equipment; and (4) evaluate alternative transportation approaches depending on specific object sizes, weights, origin, destination, peak-hour traffic, and unique handling requirements.

TRA-1b: Coordinate road improvements with local authorities. Project proponents shall consult with local planning authorities regarding increased traffic during the construction phase of future renewable energy facilities developed under the proposed Project. Each project proponent shall conduct a project-specific traffic impact assessment of the vehicle numbers per day, their size, and type to determine design for implementing local road improvements and multiple-site access locations for future renewable energy facilities developed under the proposed Project.

TRA-1c: Implement traffic control measures. Project proponents shall prepare and implement traffic control measures, such as intersection realignment coupled with speed limit reduction; installation of traffic lights and/or other signage; and addition of acceleration, deceleration, and turn lanes on routes with site entrances for future renewable energy facilities developed under the proposed Project.

TRA-1d: Ensure proper signage and travel management. Project proponents shall ensure signs are placed along future construction roads to identify speed limits, travel restrictions, and other standard traffic control information. Consideration should be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute times to minimize impacts on local commuters.

Significance After Mitigation

Implementation of mitigation measures TRA-1a through TRA-1d for future renewable energy facilities would reduce potential traffic impacts associated with performance of a circulation system or conflicts with an applicable congestion management programs during construction, operation, and decommissioning to a level less than significant.

TRA-2: Result in a change in air traffic patterns that result in substantial safety risks

Construction and Operation

The proposed Project does not include the construction of housing and, therefore, would not increase air travel demand. Development of future renewable energy facilities under the proposed Project may include uses such as windmills and concentrated solar voltaic structures, which may affect air traffic patterns due to their substantial height. Existing regulations regarding air traffic safety would require future project proponents to coordinate with the Federal Aviation Administration, branches of the United States military, and other agencies to ensure that wind and concentrated solar voltaic energy facilities would not affect air traffic patterns. Therefore, agency coordination described above would ensure that impacts would be less than significant.

TRA-3: Substantially increase hazards due to a design feature or incompatible uses

Construction and Operation

Future renewable energy facilities developed under the proposed Project may have the potential to introduce incompatible uses or result in an increase in hazards. Such impacts may result due to temporary hazards associated with construction or permanent changes to existing roadways associated with facility design. The proposed Project would be implemented on a "project-by-project" basis, and potential impacts from increased hazards on roadways cannot be determined at this time. In the event that future renewable energy facilities would require inconsistent uses on roadways or changes to existing roadways, such modifications would be designed to be consistent with existing safety standards and would not create unsafe conditions that could increase the risk of car accidents.

Traffic increases during construction of future renewable energy facilities could damage existing roadways and result in unsafe roadway conditions. Trucks loaded with construction equipment and supplies can be extremely heavy, and the weight of these vehicles combined with elevated volumes of trips generated during construction may accelerate the deterioration of roadway surfaces along designated haul routes for future renewable energy facilities. The amount of roadway degradation that may result from construction traffic would be contingent upon both the design of the pavement (type and thickness) as well as the existing condition of the roadway surface of roads used as future haul routes. Roadways with pavement design and existing conditions that are unable to withstand future construction traffic could develop cracks, ruts, and pot-holes as a result of high volumes of heavy vehicles. Such damage would represent a potential hazard to motorists as well as an economic burden to the County associated with roadway repairs.

The proposed Project would be implemented on a "project-by-project" basis based on County approval of individual renewable energy projects. Consequently, an evaluation of the conditions of specific roadways that would be used in future haul routes cannot be made at this time. Nonetheless, construction of future renewable energy facilities would have the potential to damage existing roadways and create a potential hazard to motorists as well as become an economic burden to the County due to associated roadway repairs and result in a significant impact.

Mitigation Measures

TRA-3a: Project proponents of future renewable energy facilities would be required to retain a professional civil engineer to survey and evaluate the conditions of roads along proposed haul routes

prior to commencing construction. Preconstruction conditions shall be documented for each roadway with photo and text description. Video of haul routes may also be used to document preconstruction conditions. The photographs and/or videos are to include documentation of bridges and other appurtenances such as signs, striping, drainage, and other utilities as determined in consultation with the County. The report shall make a determination of the minimum road design criteria needed to support anticipated project traffic and whether the existing roadways comply. Each project proponent shall submit the completed report to Imperial County Department of Public Works for review and comment.

TRA-3b: Project proponents of future renewable energy facilities shall enter into a Roadway Maintenance Agreement with the County of Imperial prior to issuance of a grading permit. Each project proponent shall pay its fair share of the responsibility to maintain future haul routes during construction and, if necessary, bring the roadways up to an appropriate minimum standard to handle the anticipated traffic.

TRA-3c: Project proponents of future renewable energy facilities shall be responsible for roadway preparation work, pavement construction, and repairs to County-maintained roads, including County-maintained bridges and other roadway appurtenances for any other route that is subsequently used but not identified in the Programmatic EIR. This may include, but is not limited to, bridges, signs, striping, drainage improvements and roadway shoulders. Consideration shall also be given to improvements to other infrastructure, such as IID canal and drain crossings.

Significance After Mitigation

Implementation of mitigation measures TR-3a through TR-3c would reduce potential impacts to existing roadways during construction to a level less than significant.

TRA-4: Result in inadequate emergency access

Construction and Operation

Construction and decommissioning of renewable energy facilities associated with the proposed Project could generate large numbers of vehicle trips that could temporarily reduce LOS on roadways within Imperial County, which could in turn affect emergency access. Similarly, operation and maintenance activities associated with future renewable energy facilities would have the potential to affect existing LOS and impact emergency access. Specific estimates of traffic and congestion impacts associated with future renewable energy facilities cannot be calculated at this time. The proposed Project would be implemented on a “project-by-project” basis based on the County’s approval of renewable energy projects. Because the proposed Project only identifies areas that would be suitable for renewable energy facilities and does not contain specific development proposals, traffic levels that may occur at any one time during construction and operation of future facilities are speculative and cannot be accurately determined at this stage in the planning process. Consequently, it is not possible to quantitatively analyze whether the future renewable energy facilities developed under the proposed Project would result in inadequate emergency access. Nevertheless, future development of renewable energy facilities may have the potential to reduce LOS on roadways within Imperial County, which could in turn affect emergency access and result in a significant impact.

Mitigation Measures

Mitigation measures TRA-4a through TRA-4c would also be implemented to reduce impacts associated with inadequate emergency access.

TRA-4a: Provide onsite laydown and staging. Project proponents shall ensure that their future renewable energy facility site contains adequate area for construction laydown and staging, parking for construction and operation worker vehicles, and site traffic circulation aisles.

TRA-4b: Control site access. Project proponents shall restrict traffic to the roads specified for the future renewable energy facility. Use of other unimproved roads should be restricted to emergency situations involving potential injury or loss of life.

TRA-4c: Repair project-related damage. Project proponents shall be responsible for repairing or reconstructing project-related access roads that are damaged during construction of future renewable energy facilities to return them to pre-project conditions.

Significance After Mitigation

Implementation of mitigation measures TRA-1a through TRA-1d and TRA-4a through TRA-4c would reduce potential traffic impacts associated with inadequate emergency access to a level less than significant.

TRA-5: Conflict with plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the safety or performance of such facilities

Construction and Operation

Future renewable energy facilities developed under the proposed Project are not anticipated to conflict with adopted policies, plans, and programs regarding alternative transportation. The proposed Project has established overlay zones based on a review of the existing County of Imperial Land Use Policy Map to identify areas suitable for development of future renewable energy facilities. Development of these overlay zones included defining a 0.5-mile buffer around all urban areas to avoid developed areas, which in turn, would prevent impacts to existing alternative transportation facilities. Although the proposed Project will be implemented on a "project-by-project" basis, impacts to alternative transportation facilities are expected to be less than significant, and no mitigation is required.

4.16.5 Cumulative Impacts

The proposed Project, in conjunction with existing, approved, proposed and reasonably foreseeable projects within the County, would have the potential to result in cumulative traffic impacts; however, it is unlikely that the majority of the foreseeable projects within the County would be under construction at the same time as future renewable energy facilities developed under the proposed Project. Furthermore, future renewable energy facilities developed under the proposed Project would occur over a long period of time; and it is unlikely that a large number of future facilities would be developed at the same time. Due to the long duration that both foreseeable projects within the County and facilities to be developed under the proposed Project would be spread across, it is unlikely that high levels of construction traffic would occur concurrently. Furthermore, the project-specific traffic impact assessment required under mitigation measure TRA-1b would evaluate potential impacts from a

cumulative perspective. Traffic impact assessments must consider how a future project would affect traffic conditions in conjunction with existing, approved, proposed, and reasonably foreseeable projects within the County and, therefore, would identify cumulative impacts that would be mitigated through implementation of the remainder of the mitigation measures described in Section 4.16.4 above. Foreseeable projects within the County would be subject to similar mitigation requirements that would address traffic impacts from a cumulative perspective and propose mitigation measures as necessary. Therefore, implementation of mitigation measures TRA-1a through TRA-4c would reduce cumulative traffic impacts to a level less than significant.

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