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| **Docket Number:** | 24-OPT-03 |
| **Project Title:** | Soda Mountain Solar |
| **TN #:** | 257918 |
| **Document Title:** | Section 3-17 Transportation |
| **Description:** | This Section evaluates the direct, indirect and cumulative impacts the Project may have on transportation resources and identifies any required Applicant-Proposed Measures (APM) and any required Mitigation Measures. |
| **Filer:** | Hannah Gbeh |
| **Organization:** | Resolution Environmental |
| **Submitter Role:** | Applicant Consultant |
| **Submission Date:** | 7/22/2024 5:19:38 PM |
| **Docketed Date:** | 7/23/2024 |

# 3.17 TRANSPORTATION

This section evaluates impacts to the existing transportation network that may result directly or indirectly from the proposed project. The analysis in this section describes the applicable regulations, presents an overview of existing conditions, identifies the California Environmental Quality Act (CEQA) criteria used for determining the significance of environmental impacts, and lists applicant-proposed measures (APMs) that would be incorporated into the project to avoid or substantially lessen potentially significant impacts to the extent feasible. The analysis is based on a review of existing resources, technical data, and applicable laws, regulations, plans, and policies, as well as the following technical reports prepared for the project:

- *Soda Mountain Solar Project Transportation Analysis, San Bernardino, California* (Transportation Impact Study [TIS]) (Kittelson & Associates, Inc. 2024) (Appendix M)

## 3.17.1 Regulatory Setting

The project is located on approximately 2,670 acres of land administered by the U.S. Department of Interior, Bureau of Land Management (BLM), California Desert District, within the jurisdiction of the Barstow Field Office in San Bernardino County.

### *3.17.1.1 Federal*

Federal rules and regulations govern many facets of San Bernardino County's traffic and circulation system, including transportation planning and programming; funding; and design, construction, and operation of facilities. The County complies with all applicable rules and regulations of the Federal Highway Administration, Federal Transit Administration, Federal Railroad Administration, Federal Aviation Administration, and other federal agencies, as required.

#### CODE OF FEDERAL REGULATIONS

Title 49 of Code of Federal Regulations Subtitle B, Parts 171-173, 177-178, 350-359, 397.9, and Appendices A through G address safety considerations for the transport of goods, materials, and substances and governs the transportation of hazardous materials, including types of materials and marking of the transportation vehicles.

### *3.17.1.2 State*

As the County complies with federal rules and regulations, it also complies with applicable State rules and regulations, including those of the California Department of Transportation (Caltrans), and coordinates with State resource agencies.

#### SENATE BILL 743

Senate Bill 743 (SB 743) was signed into law in September 2013. It required changes to the California CEQA Guidelines specifically related to the analysis of transportation impacts. Prior to SB 743, transportation analyses under CEQA focused on factors such as roadway delay and capacity at specific locations. However, SB 743 introduced significant changes by eliminating the use of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. Instead, SB 743 identified vehicle miles traveled (VMT) as the most appropriate metric for evaluating a project's transportation impacts under CEQA. This means that since

the bill took effect, automobile delay measured by LOS and similar metrics no longer qualifies as a significant environmental effect under CEQA. However, LOS can still be used as a measure for local agency planning purposes.

In December 2018, the California Governor's Office of Planning and Research (OPR) and the State Natural Resources Agency submitted updated State CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law approved these updated guidelines making VMT the primary metric for analyzing transportation impacts. As of July 1, 2020, compliance with SB 743 and the use of SB 743-compliant CEQA analysis became mandatory for land use and transportation projects.

## Office of Planning Research's VMT Screening Criteria

To be screened out of a detailed VMT analysis, a project or project component would need to satisfy at least one of the VMT screening criteria. A summary of OPR's screening criteria and determinations are listed below:

- **Small Project Size**: Projects generating less than 110 trips per day may be considered to have an insignificant impact to VMT. This threshold is not VMT based but relates to the CEQA categorical exemption for existing facilities and additions to existing structures up to 10,000 square feet.
- **Projects within Transit Priority Areas (TPAs)**: Projects, including residential, retail, and office projects, as well as mixed-use projects within a 0.5 mile of an existing major transit stop or along a high-quality transit corridor, are generally presumed to have a minor impact to VMT. This presumption is not valid if project-specific or location-specific information indicates significant VMT levels. An existing major transit stop is defined as a site with a rail transit station, a ferry terminal served by bus or rail transit, or the intersection of multiple major bus routes with frequent service during peak commute periods.
- **Local-Serving Retail**: Projects categorized as local-serving retail are presumed to have an insignificant impact to VMT.
- **Redevelopment Projects Resulting in Net VMT Reduction**: Redevelopment projects that would decrease VMT, meaning the proposed land use generates less VMT than the existing use, may be considered to have an insignificant impact to VMT.
- **Affordable Housing**: The OPR's technical advisory provides special considerations for affordable housing. Projects that consist of 100% affordable housing in infill locations are presumed to have a minor impact to VMT. Infill locations generally offer better access to transit and more opportunities for walking and cycling. The definition of infill locations is determined based on local conditions.

As described below, the County issued an update to its Transportation Impact Study Guidelines (TISG) on July 9, 2019 (San Bernardino County 2019), to provide recommendations related to VMT assessment (both thresholds of significance and methodology for identifying VMT related impacts) and to refine the County's existing TISG to reflect methodologies for identifying impacts.

## CALIFORNIA VEHICLE CODE

The California Vehicle Code (CVC) includes regulations pertaining to licensing, size, weight, and load of vehicles operated on highways; safe operation of vehicles; and the transportation of hazardous materials. The following sections would apply to the project:

- CVC Sections 13369, 15275, and 15278 address the licensing of drivers and classifications of licenses required to operate particular types of vehicles.
- CVC Section 32100.5 addresses the transportation of hazardous materials that pose an inhalation hazard.
- CVC, 13 California Code of Regulations (CCR) 1160, et seq. provides the CHP with authority to adopt regulations for the transportation of hazardous materials in California. The CHP can issue permits and specify the route for hazardous material delivery.
- California Streets and Highway Code (S&HC), Sections 660, 670, 1450, 1460 et seq., 1470, and 1480 regulate right-of-way (ROW) encroachment and granting of permits for encroachments on state and county roads.
- S&HC Sections 117 and 660–711 and CVC Section 35780 et seq. require permits to transport oversized loads on county roads. S&HC Sections 117 and 660 to 711 require permits for any construction, maintenance, or repair involving encroachment on state highway rights-of-way. CVC Section 35780 requires approval for a permit to transport oversized or excessive loads over state highways.
- Caltrans weight and load limitations for state highways apply to all state and local roadways. The weight and load limitations are specified in CVC Sections 35550 to 35559.

The following provisions, from the CVC, apply to all roadways and are also applicable to the proposed project.

- General Provisions: The gross weight imposed upon the highway by the wheels on any axle of a vehicle shall not exceed 20,000 pounds and the gross weight upon any one wheel, or wheels, supporting one end of an axle, and resting upon the roadway, shall not exceed 10,500 pounds.
- The maximum wheel load is the lesser of the following: (a) the load limit established by the tire manufacturer, or (b) a load of 620 pounds per lateral inch of tire width, as determined by the manufacturer's rated tire width.
- Vehicles with Trailers or Semi-trailers: The gross weight imposed upon the highway by the wheels on any one axle of a vehicle shall not exceed 18,000 pounds and the gross weight upon any one wheel, or wheels, supporting one end of an axle and resting upon the roadway, shall not exceed 9,500 pounds, except that the gross weight imposed upon the highway by the wheels on any front steering axle of a motor vehicle shall not exceed 12,500 pounds.

## CALIFORNIA DEPARTMENT OF TRANSPORTATION LOCAL DEVELOPMENT-INTERGOVERNMENTAL REVIEW

The Caltrans Local Development-Intergovernmental Review program uses the TISG during environmental review of land use projects and plans (Caltrans 2020a). The Caltrans Local Development-Intergovernmental Review program works with local jurisdictions early and throughout their land use planning and decision-making processes, consistent with the requirements of CEQA and state planning law. Caltrans seeks to reduce single-occupancy-vehicle trips; provide a safe transportation system; reduce per-capita VMT; increase accessibility to destinations via cycling, walking, carpooling, and transit; and

reduce greenhouse gas (GHG) emissions. Those goals, along with standard CEQA practice, create the foundation of Caltrans review of proposed new land use projects.

The 2020 TISG replaces Caltrans' previous 2002 TISG, which was based on vehicle delay and congestion. Based on the 2020 TISG, for land use projects and plans, automobile delay is no longer considered a significant impact to the environment under CEQA per SB 743. Caltrans' review of land use projects and plans is now based on VMT, consistent with changes to the State CEQA Guidelines (14 CCR 15064.3[b][1]). This 2020 VMT-focused TISG provides a foundation for review of how lead agencies apply the VMT metric to CEQA project analyses. The analysis provided in Section 3.17.3 under Impact TR-2 is consistent with Caltrans' 2020 TISG.

### *3.17.1.3 Local*

The project is located on federally owned land managed by the BLM. While it is not subject to of San Bernardino County land use plans and ordinances, local plans were reviewed for informational purposes.

#### SAN BERNARDINO ASSOCIATED GOVERNMENTS CONGESTION MANAGEMENT PROGRAM

The passage of Proposition 111 in 1990 established a process for each metropolitan county in California to prepare a Congestion Management Plan (CMP). The CMP ties the tying appropriation of new gas tax revenues to congestion reduction efforts and is managed at the countywide level. The CMP primarily uses a LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics.

The San Bernardino Associated Governments (SANBAG) prepared the San Bernardino County CMP, in consultation with San Bernardino County and cities in the county, in an effort to align land use, transportation, and air quality management efforts and promote reasonable growth management programs that effectively use statewide transportation funds, while ensuring that new development pays its fair share of needed transportation improvements. In San Bernardino County, SANBAG is responsible for planning and managing vehicular congestion and coordinating regional transportation policies. The CMP includes goals that are supportive of maintaining and enhancing the multimodal transportation system and also includes, by association, the goals of the Southern California Association of Governments' (SCAG's) latest Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Through the use of traffic impact analysis reports and Comprehensive Transportation Plan model forecasts, the CMP evaluates proposed land use decisions to ensure adequate transportation network improvements that are developed to accommodate future growth in population. If a CMP facility is found to fall below the LOS standard under either existing or future conditions, a deficiency plan must be prepared, adopted, and implemented by local jurisdictions that contribute to such situations.

Annual monitoring activities are a method of accountability for those local jurisdictions required to mitigate a network facility with substandard LOS. While this interjurisdictional approach provides political and technical consistency for future development in the county, the CMP is only a mechanism to be used to guide efforts in a more efficient manner. It is not to be considered a replacement to the RTP/SCS.

#### SAN BERNARDINO COUNTYWIDE TRANSPORTATION PLAN

The San Bernardino County Transportation Authority (SBCTA), formerly known as SANBAG, developed the County's Countywide Transportation Plan (CTP), which was released in September 2015.

The CTP has a horizon year of 2040 and serves as the County's input into the SCAG RTP/SCS. The purpose of the CTP is to lay out a strategy for long-term investment in and management of the County's transportation system. Key issues addressed by the CTP include transportation funding, congestion relief, economic competitiveness, system preservation and operations, transit system interconnectivity, air quality, sustainability, and GHG emission reductions. The CTP analyzes a Year 2040 baseline scenario with traditional revenue sources and an aggressive scenario that assumes added revenue sources defined in SCAG's RTP/SCS. The CTP has developed a set of strategies to address issues such as air quality, goods movement, sustainability, and active transportation.

## REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The SCAG, of which San Bernardino County is a part, includes an Intergovernmental Review section under the under the Environmental Planning Division of Planning and Policy that is responsible for performing consistency review of regionally significant local plans, projects, and programs. Regionally significant projects are required to be consistent with SCAG's adopted regional plans and policies, such as Connect SoCal (the 2020–2045 RTP/SCS). The criteria for projects of regional significance are outlined in the State CEQA Guidelines Sections 15125 and 15206. According to SCAG's Intergovernmental Review Procedures Handbook (SCAG 2012), "new or expanded electrical generating facilities and transmission lines" qualify as regionally significant projects.

SCAG adopted the Connect SoCal (2020–2045 RTP/SCS) on September 3, 2020. The 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and sustainable growth with land use and transportation strategies to reach the region's GHG reduction goals. The 2020–2045 RTP/SCS includes the following specific goals and strategies that are applicable to the proposed project to integrate land use and transportation, such that the region can grow smartly and sustainably:

- Encourage regional economic prosperity and global competitiveness
- Reduce GHG emissions and improve air quality
- Adapt to a changing climate and support an integrated regional development pattern and transportation network

## SAN BERNARDINO COUNTY TRANSPORTATION IMPACT STUDY GUIDELINES

The County's TISG, dated July 9, 2019 (San Bernardino County 2019), provides a guide in assessing a proposed development project's potential transportation impacts. As stated within the TISG, a Transportation Impact Study is required if one or more of the following criteria is met:

- A project generates 100 or more trips without consideration of pass-by trips during any peak hour.
- A project is located within 300 feet of
    - The intersection of two streets designated as Collector or higher in the County's General Plan or the Department's Master Plan or
    - An impacted intersection as determined by the Traffic Division.
- A project creates safety or operational concerns.
- A project has the potential to generate VMT that could result in a transportation impact as noted in the significance criteria presented within the TISG.
- A project generates less than 100 trips without consideration of pass-by trips during any peak hour, a study may be required if there are special concerns.

As further described under Impact TR-1 (Section 3.17.3), although the proposed project does not trigger the criteria requiring a Transportation Impact Study a TIS was prepared for the proposed project to assess construction-related traffic impacts to roadway operations using LOS, specifically at the I-15/Rasor Road interchanges and along the mainline segments of I-15 between Basin Road and Zzyxx Road. See Appendix M for detailed LOS calculations prepared in accordance with the County's TISG.

As it relates to VMT, according to the County's TISG, land use projects that meet certain screening criteria are assumed to result in a less-than-significant transportation impact under CEQA and do not require a detailed quantitative VMT assessment. Consistent with OPR guidance, the County identifies the following project types as appropriate for screening. Projects need only meet one of the listed criteria to be screened from a VMT analysis:

- **Local Community Projects.** The following list of projects would be screened out:
  - K-12 schools
  - Local-serving retail less than 50,000 square feet
  - Local parks
  - Day care centers
  - Local-serving gas stations
  - Local-serving banks
  - Student housing projects
  - Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- **Trip Generation Threshold**. Projects generating less than 110 daily vehicle trips, which generally corresponds to the following "typical" development potentials:
  - 11 single family housing units
  - 16 multi-family, condominiums, or townhouse units
  - 10,000 square feet of office
  - 15,000 square feet of light industrial
  - 63,000 square feet of warehouse
  - 79,000 square feet of high cube transload and short-term storage warehouse
  - 12 hotel rooms
- **Transit Priority Area (TPA).** Projects located within a TPA as determined in the most recent SCAG RTP/SCS.
- **Low-VMT Area.** Projects located within a low-VMT-generating area as determined by the analyst based on the County's VMT efficient area maps available online at SBCTA VMT Screening Tool.

Projects that do not meet the screening criteria above should be considered to have a significant impact if the project VMT per person/employee is greater than 4% below the existing baseline VMT per person for the unincorporated county.

As further described under Impact TR-2 (Section 3.17.3), the proposed project meets the screening criteria, and a detailed quantitative VMT assessment is not required.

## SAN BERNARDINO COUNTYWIDE PLAN

The San Bernardino Countywide Plan (San Bernardino County 2024a), adopted by the Board of Supervisors in 2020, updates and expands the County's General Plan by addressing the physical, social, and economic issues facing the unincorporated portions of the county. The Countywide Plan consists of the Policy Plan, the Business Plan, and a communities plan. The Policy Plan, based on the former General Plan, consists of 11 elements: Land Use, Housing, Infrastructure and Utilities, Transportation and Mobility, Natural Resources, Renewable Energy and Conservation, Cultural Resources, Hazards, Personal and Property Protection, Economic Development, and Health and Wellness. The Business Plan consists of a policy-based governance element along with an implementation plan. The communities plan consists of 35 Community Action Guides that provide a framework for communities to create future character and independent identity through community actions.

The Transportation and Mobility Element of the General Plan includes goals and policies for transportation facilities that adequately serve traffic, including roadway capacity, road design standards, VMT, complete streets, goods movement, and airports. The following policies in the Transportation and Mobility Element are relevant to this analysis (San Bernardino County 2024b).

**Goal TM-1 Roadway Capacity** Unincorporated areas served by roads with capacity that is adequate for residents, businesses, tourists, and emergency services.

- **Policy TM-1.1 Roadway level of service (LOS)**. We require our roadways to be built to achieve the following minimum level of service standards during peak commute periods (typically 7:00-9:00 AM and 4:00-6:00 PM on a weekday):
  - LOS D in the Valley Region
  - LOS D in the Mountain Region
  - LOS C in the North and East Desert Regions
- **Policy TM-1.2 Interjurisdictional roadway consistency**. We promote consistent cross-sections along roads traversing incorporated and unincorporated areas.
- **Policy TM-1.3 Freeways and highways**. We coordinate with Caltrans and regional transportation agencies and support the use of state, federal, and other agency funds to improve freeways and highways.
- **Policy TM-1.4 Unpaved roadways**. The County does not accept new unpaved roads into the County Maintained Road System, and we require all-weather treatment for all new unpaved roads.
- **Policy TM-1.5 Upgrading unpaved roads**. We support the paving of unpaved roads when funding is contributed through a local area funding and financing mechanism.
- **Policy TM-1.6 Paved roads**. For any new development for which paved roads are required, we require the developer to construct the roads and we require the establishment of a special funding and financing mechanism to pay for roadway operation, maintenance, and set- aside reserves.
- **Policy TM-1.7 Fair share contributions**. We require new development to pay its fair share contribution toward off-site transportation improvements.
- **Policy TM-1.8 Emergency access**. When considering new roadway improvement proposals for the CIP or RTP, we consider the provision of adequate emergency access routes along with capacity expansion in unincorporated areas. Among access route improvements, we prioritize those that contribute some funding through a local area funding and financing mechanism.

- **Policy TM-1.9 New transportation options**. We support the use of transportation network companies, autonomous vehicles, micro transit, and other emerging transportation options that reduce congestion, minimize land area needed for roadways, create more pedestrian- and bicycle-friendly streets, reduce VMT, or reduce dependence on privately-owned vehicles.

**Goal TM-2 Road Design Standards** Roads designed and built to standards in the unincorporated areas that reflect the rural, suburban, and urban context as well as the regional (valley, mountain, and desert) context.

- **Policy TM-2.1 Context sensitive approach**. We maintain and periodically update required roadway cross sections that prioritize multi-modal systems inside mobility focus areas (based on community context), and vehicular capacity on roadways outside of mobility focus areas (based on regional context).
- **Policy TM-2.2 Roadway improvements**. We require roadway improvements that reinforce the character of the area, such as curbs and gutters, sidewalks, landscaping, street lighting, and pedestrian and bicycle facilities. We require fewer improvements in rural areas and more improvements in urbanized areas, consistent with the Development Code. Additional standards may be required in municipal spheres of influence.
- **Policy TM-2.3 Concurrent improvements**. We require new development to mitigate project transportation impacts no later than prior to occupancy of the development to ensure transportation improvements are delivered concurrent with future development.
- **Policy TM-2.4 Atypical intersection controls**. We allow the use of atypical intersection concepts such as roundabouts when they improve traffic flow and safety compared to conventional intersection controls.
- **Policy TM-2.5 Context-based features**. When making road improvements, we provide feasible, context- based transportation features such as:
    - Chain installation and inspection areas in the Mountain Region
    - Slow-vehicle turnouts on roadways with steep grades
    - Limited on-street parking areas to serve snowplow or emergency services
    - Passing lanes in rural areas
    - Vista areas along scenic routes
- **Policy TM-2.6 Access control**. We promote shared/central access points for direct access to roads in unincorporated areas to minimize vehicle conflict points and improve safety, especially access points for commercial uses on adjacent properties.

**Goal TM-3 Vehicle Miles Traveled** A pattern of development and transportation system that minimizes vehicle miles traveled.

- **Policy TM-3.1 VMT Reduction**. We promote new development that will reduce household and employment VMT relative to existing conditions.
- **Policy TM-3.2 Trip reduction strategies**. We support the implementation of transportation demand management techniques, mixed use strategies, and the placement of development in proximity to job and activity centers to reduce the number and length of vehicular trips.
- **Policy TM-3.3 First mile/last mile connectivity**. We support strategies that strengthen first/last mile connectivity to enhance the viability and expand the utility of public transit in unincorporated areas and countywide.

**Goal TM-4 Complete Streets, Transit, and Active Transportation** On- and off-street improvements that provide functional alternatives to private car usage and promote active transportation in mobility focus areas.

- **Policy TM-4.1 Complete streets network**. We maintain a network of complete streets within mobility focus areas that provide for the mobility of all users of all ages and all abilities, while reflecting the local context.
- **Policy TM-4.2 Complete streets improvements**. We evaluate the feasibility of installing elements of complete street improvements when planning roadway improvements in mobility focus areas, and we require new development to contribute to complete street improvements in mobility focus areas. In evaluating complete street improvements, we prioritize those in mobility focus areas that are within unincorporated environmental justice focus areas.
- **Policy TM-4.3 Funding**. We partner with SBCTA, Caltrans, and local agencies to fund active transportation systems in the county. We encourage unincorporated communities to apply for funding and cooperate with them in their funding applications for active transportation improvements that are identified in a non-motorized transportation plan that is accepted or adopted by the County.
- **Policy TM-4.4 Transit access for residents in unincorporated areas**. We support and work with local transit agencies to generate a public transportation system, with fixed routes and on-demand service, that provide residents of unincorporated areas with access to jobs, public services, shopping, and entertainment throughout the county.
- **Policy TM-4.5 Transit access to job centers and tourist destinations**. We support and work with local transit agencies to generate public transportation systems that provide access to job centers and reduce congestion in tourist destinations in unincorporated areas.
- **Policy TM-4.6 Transit access to public service, health, and wellness**. In unincorporated areas where public transit is available, we prefer new public and behavioral health facilities, other public facilities and services, education facilities, grocery stores, and pharmacies to be located within one-half mile of a public transit stop. We encourage and plan to locate new County health and wellness facilities within one-half mile of a public transit stop in incorporated jurisdictions. We encourage public K-12 education and court facilities to be located within one-half mile of public transit.
- **Policy TM-4.7 Regional bicycle network**. We work with SBCTA and other local agencies to develop and maintain a regional backbone bicycle network.
- **Policy TM-4.8 Local bicycle and pedestrian networks**. We support local bike and pedestrian facilities that serve unincorporated areas, connect to facilities in adjacent incorporated areas, and connect to regional trails. We prioritize bicycle and pedestrian network improvements that provide safe and continuous pedestrian and bicycle access to mobility focus areas, schools, parks, and major transit stops.
- **Policy TM-4.9 Bike and pedestrian safety**. We promote pedestrian and bicyclist safety by providing separated pedestrian and bike crossings when we construct or improve bridges over highways, freeways, rail facilities, and flood control areas. We monitor pedestrian and bicycle traffic accidents and promote safety improvements in unincorporated high- accident areas.
- **Policy TM-4.10 Shared parking**. We support the use of shared parking facilities that provide safe and convenient pedestrian connectivity between adjacent uses.

- **Policy TM-4.11 Parking areas**. We require publicly accessible parking areas to ensure that pedestrians and bicyclists can safely access the site and onsite businesses from the public right-of-way.

**Goal TM-5 Goods Movement** A road, rail, and air transportation system that supports the logistics industry and minimizes congestion in unincorporated areas.

- **Policy TM-5.1 Efficient and sustainable goods movement network**. We advocate for the maintenance of a goods movement system in southern California that is efficient and sustainable and that prioritizes public health through the use of zero-emission equipment and infrastructure.
- **Policy TM-5.2 Intermodal facility**. We support the development of an intermodal facility in connection with the Southern California Logistics Airport.
- **Policy TM-5.3 High Desert Corridor**. We support the development of the High Desert Corridor to improve the regional goods movement network and foster economic development in the North Desert region.
- **Policy TM-5.4 Grade separations**. We support grade separations to reduce conflicts between rail facilities and roadways, subject to available funding.
- **Policy TM-5.5 Countywide truck routes**. We support SBCTA's establishment of regional truck routes that efficiently distribute regional truck traffic while minimizing impacts on residents. We support funding through the RTP to build adequate truck route infrastructure.
- **Policy TM-5.6 Unincorporated truck routes**. We establish local truck routes in unincorporated areas to efficiently funnel truck traffic to freeways while minimizing impacts on residents. We establish routes where trucks are prohibited in unincorporated environmental justice focus areas and to avoid overlaps or conflicts with safe routes to schools.
- **Policy TM-5.7 Trucking-intensive businesses**. We require trucking-intensive businesses to pay their fair share of costs to build and maintain adequate roads.

## 3.17.2 Environmental Setting

The 2,670-acre project site is located in a rural area of the Mojave Desert, approximately 7 miles southwest of the town of Baker and 50 miles northeast of the city of Barstow. Interstate 15 (I-15) runs along the western boundary of the proposed project site with northbound and southbound on- and off-ramps at Rasor Road. The Rasor Off-Highway Vehicle (OHV) recreation area is located at the southeast corner and 0.5 mile from the western boundary of Mojave National Preserve. The closest airport is Baker Airport, approximately 8 miles north of the project site. The Barstow-Daggett Airport is located more than 30 miles west of the project site (Figure 3.17-1).

The proposed project would consist of a solar facility, a substation and switchyard for interconnection with the existing transmission system, approximately 300 MW of battery energy storage systems (BESS), and operation and maintenance (O&M) buildings and structures, stormwater infrastructure, and related infrastructure and improvements. The solar plant site would be fenced and would cover all facilities that create a footprint in and around the field of solar panels including the substation; BESS yard; and Arrays 1, 2, 3 and 4. These proposed facilities would be located on the south side of I-15 with underground connections from the substation to the switchyard on north side of I-15 via a generation-tie line (gen-tie line) within an existing Caltrans culvert. The switchyard would be located adjacent to the Los Angeles Department of Water and Power (LADWP) Marketplace-Adelanto 500-kilovolt transmission line ROW and would permanently occupy approximately 5 acres (also see Figure 2-3 through Figure 2-6 in Chapter 2, Project Description).

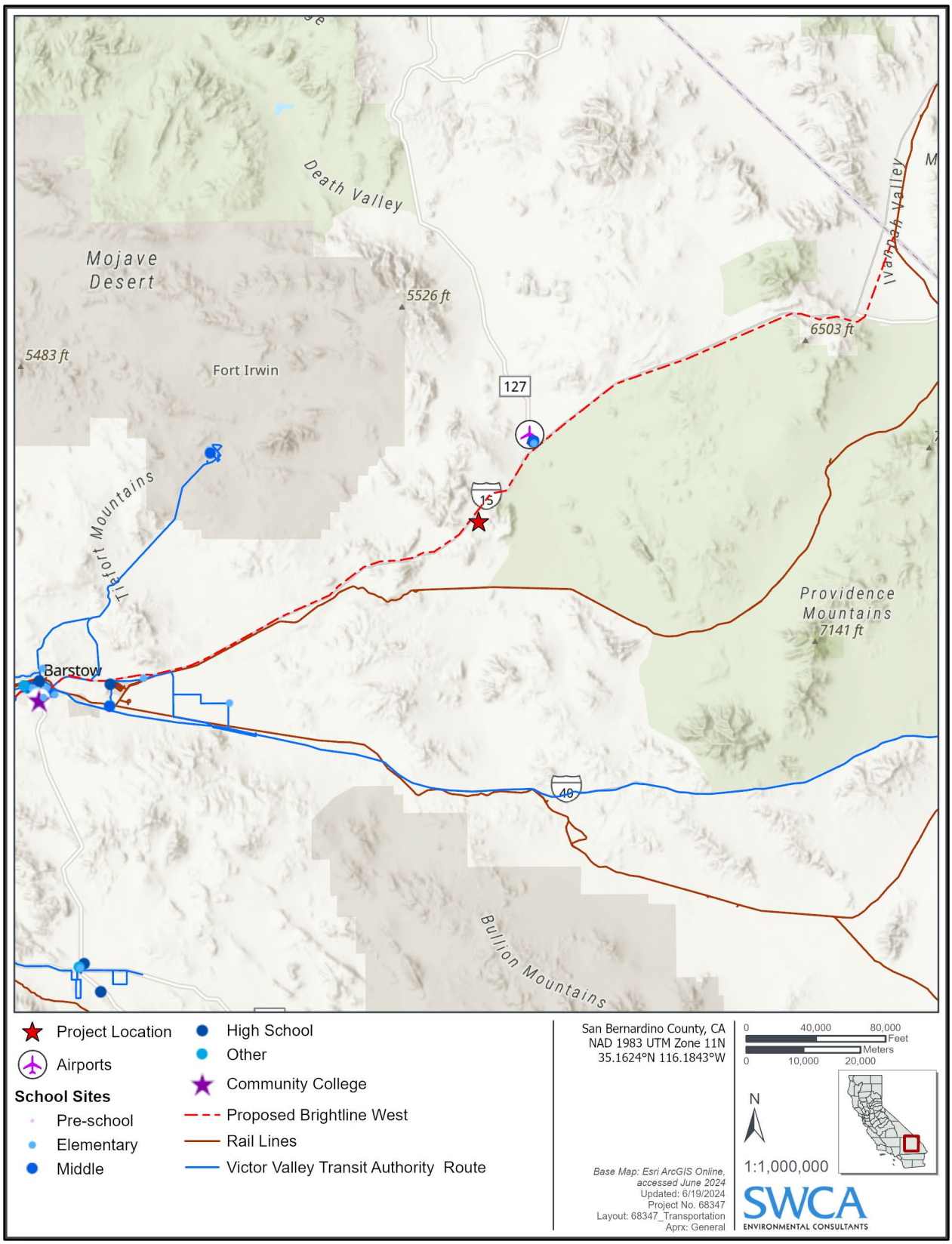


**Figure 3.17-1. Transportation setting.**

### *3.17.2.1 Regional and Local Roadway Facilities*

The primary mode of travel in the vicinity of the project site is vehicular travel served by the regional and local roadway facilities. There are no transit services, no paved sidewalks, and no dedicated bicycle lanes within the project site.

#### REGIONAL ACCESS

I-15 is a major, north-south, four-lane freeway with two lanes in each direction that runs in a southwest-northeast alignment for approximately 287 miles from the Mexican border to the Nevada state line. I-15 serves as a crucial transportation route for both commercial and passenger traffic, connecting cities and communities throughout San Bernardino County, Los Angeles County, and points farther southwest, as well as cities and communities in Nevada and to points farther northeast, e.g., San Diego, Riverside, Barstow, and Las Vegas. The most recent data published by Caltrans indicates the annual average daily traffic at the I-15/Rasor Road interchange is about 45,500 vehicles (Caltrans 2022). It has been designed to hold a capacity of 1,850 vehicles per lane per hour during the peak hour (Caltrans 2020b). On all roads in San Bernardino County, oversized/overweight load permits are required for vehicles over 65 feet long, over 80,000 pounds in gross weight, over 14 feet high, or over 8 feet and 6 inches wide.

#### LOCAL ACCESS

Local access to the proposed project site from I-15 during construction, operation, and decommissioning would be from the interchange ramps at Rasor Road, a BLM public access road. North of I-15, the existing LADWP/Southern California Edison (SCE) transmission maintenance road provides access to the LADWP switchyard. A Caltrans access road to the Opah Ditch pit mine could also be used for construction of the switchyard and gen-tie line interconnection to the substation on the south side of I-15. These low-volume roads are a mix of unpaved and paved and allow for two lanes of traffic. They serve low-intensity uses such as the Rasor OHV recreation area, air strips, and other desert areas. A Shell Oil gas station southwest of the proposed project site is located on Rasor Road.

Rasor Road is a two-lane east-west roadway with one travel lane in each direction. It is classified as a secondary highway and has been designed to hold a capacity of 2,000 vehicles per day (Appendix M). Beyond the Shell Oil gas station, Rasor Road becomes an unpaved roadway. Primary access to the project site, i.e., the proposed solar plant site, substation, and BESS yard, would be through a gated entrance on Rasor Road. From the gated entrance at the southwest corner of the project site, Rasor Road continues for approximately 1.4 miles before it forks into a western route (Rasor Road) leading to the Rasor OHV recreation area and a northern route (Arrowhead Trail Road) continuing through the project site. Access to the proposed gen-tie-line and switchyard on the north side of I-15 would be provided via Rasor Road and Arrowhead Trail Highway. Arrowhead Trail Highway is an unimproved two-lane, north-south roadway parallel to I-15. It is classified as a local road and has been designed to a capacity of 2,000 vehicles per day. Other unpaved roads within and immediately surrounding the proposed project site are on BLM lands and are generally used by recreational motorists. Existing roadway conditions are provided in Table 3.17-1.

**Table 3.17-1. Existing Roadway Conditions**

| Roadway | Number of Lanes | Classification | Capacity (vehicles per day) | Heavy Vehicles | Weight Restriction |
|---|---|---|---|---|---|
| Interstate 15 | 4 (divided) | Highway | 45,550 | 20% | N/A |
| Rasor Road | 2 (undivided) | Local | 500–2,000 | N/A | N/A |

Source: Kittelson and Associates, Inc. (2024); Caltrans (2022).

# 3.17.3 Impact Analysis

## *3.17.3.1 Thresholds of Significance*

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by the State CEQA Guidelines, Appendix G. Specifically, the project would be considered to have a significant impact related to transportation 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 State CEQA Guidelines 15064.3(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

Each of these thresholds is discussed under Section 3.17.3.3, Cumulative Impacts, below.

## *3.17.3.2 Applicant-Proposed Measures*

The applicant has identified and committed to implement the following APMs as part of the proposed project to avoid or substantially lessen potentially significant impacts to traffic and transportation, to the extent feasible.

**APM TRA-1 Construction Traffic Management Plan:** The applicant should prepare a Construction Traffic Management Plan (CTMP) for project construction to minimize adverse effects of project construction traffic. The CTMP may be prepared in consultation with the County of San Bernardino Public Works Department or Caltrans prior to construction activities and identify the following:

- A breakdown of the number, type, capacity, and dimensions of the construction vehicles that would service the project site
- An estimate of the average daily or weekly number of vehicles per vehicle type during each major phase of the work
- Routing of passenger/worker vehicles, delivery vehicles, and excavation and construction vehicles
    - Review of site access as well as recommendations of signage and markings as needed so accessibility to the Shell Oil gas station is not affected
    - Enforcement of routing
    - Delivery hour restrictions, if applicable
    - Traffic control methods and when each is required
    - A contact for complaints and how complaints are to be addressed

Traffic control shall be implemented during grading and construction of the project's main access point from Rasor Road and when large deliveries in wide-load vehicles or a high volume of deliveries occurs. Traffic control may include escort vehicles for wide loads, signage, and/or flaggers. Traffic control should be consistent with the requirements of the Manual of Uniform Traffic Control Devices (Federal Highway Administration 2023). All roadways should always be open to emergency personnel.

Under the proposed plan, the project site would be fenced off with vehicular access via a gate off Rasor Road. With APM TRA-2 the applicant would minimize the adverse effects of project construction traffic on access to the Rasor OHV recreation area.

**APM TRA-2 Recreationalist Access:** The proposed solar array areas would be fenced and unavailable to recreationalists. The arrays would block access to Arrowhead Trail Road, which is designated as a closed road by BLM. Rasor Road would remain along the southern boundary of the project site and maintain public access to the Rasor OHV recreation area. Road signage notifying recreationalists of road closures and alternate routes would be installed as needed. Rasor Road would be graded but remain unpaved. The road would conform to BLM specifications and would be approximately 26 feet wide and 2.85 miles long.

## *3.17.3.3 Impact Assessment*

### *Impact TR-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less than Significant)*

The analysis below addresses whether the proposed project would conflict with a program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If a project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the County itself over time, and over a broad area. Rather, a project would result in a conflict if it would preclude the County from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with a project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan, and policy would foreseeably result in a physical impact to the environment.[1]

#### SAN BERNARDINO COUNTY TRANSPORTATION IMPACT STUDY GUIDELINES

As noted in Section 5, CEQA Assessment – Active Transportation and Public Transit Analysis, of the County's TISG, in accordance with the State CEQA Guidelines, a TIS should examine if a project is inconsistent with adopted policies, plans, or programs regarding active transportation or public transit facilities, or otherwise decreases the performance or safety of such facilities. However, the County's TISG does not include a list of transportation-related programs, plans, ordinances, and policies that should be consulted to identify the potential for conflicts with a project. Section 3.17.1 details the criteria that would need to be met to require a TIS. Based on those criteria, and as further detailed in the TIS (see Appendix M), operation of the proposed project is expected to generate fewer than 110 daily vehicle trips due to the remote-control operations. Furthermore, the project site is not located within 300 feet of an intersection of two collector streets or higher, or any impacted intersections as determined by the Traffic Division. The proposed project is a utility-scale solar and energy storage facility and would not create safety or operational concerns. As described below under Impact TR-2, the proposed project would not generate VMT that would result in a significant impact. Therefore, the proposed project does not meet any of the screening criteria requiring that a TIS be completed. Although the project site is located on land administered by the BLM (Barstow Field Office) it influences the local roadway network. Furthermore, public comments and concerns with the proposed project's construction-related traffic on

[1] The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

roadway operations were raised during public outreach. Therefore, a TIS was prepared and is included as Appendix M.

## CONGESTION MANAGEMENT PLAN

### Project Construction and Decommissioning

Project construction is anticipated to be completed over a period of approximately 18 months with work expected to occur from Monday through Friday from 6:00 a.m. to 6:00 p.m. Construction of the proposed project would result in workers traveling to/from the site and deliveries of equipment and materials generating temporary vehicle trips to the area.

As discussed in the TIS, the on-site construction workforce is expected to peak at approximately 300 individuals; however, the average daily workforce on-site is expected to be 200 construction, supervisory, support, and construction management personnel. While passenger vehicle trips associated with the workforce are expected to be a daily occurrence during construction, heavy vehicle trips would vary throughout the construction period. Over the approximately 18-month construction period, the proposed project would require approximately 5,000 truckloads of construction materials per month for delivery of components and construction materials, including concrete. Up to 90,000 truckloads would result over the total construction period, excluding travel by construction workers. As water is obtained from an off-site source during construction, an estimated 17 water transport truck trips per day would also be required. Average truck traffic would be approximately 80 trucks per day, 25 days per month. The proposed project would use a just-in-time delivery system with supplies and components delivered on a schedule to minimize on-site storage needs.

The roadway network in the vicinity is characterized by free-flowing traffic conditions, with limited existing traffic. The estimated maximum addition of 1,068 daily vehicle trips during construction (600 daily passenger commute trips, 400 heavy duty truck delivery trips, and 68 water truck delivery trips) would temporarily increase traffic volumes on I-15 and may reduce its performance. Even though the proposed project would generate a significant number of worker, delivery, and construction vehicle trips throughout construction, traffic flow in the vicinity of the project site would not be adversely affected. Given the existing daily traffic on I-15 (45,500 vehicles), an additional 1,068 trips would increase the daily traffic volumes by 2.3%.

Construction traffic is considered temporary (approximately 18 months) and is not expected to negatively affect current operations of the roadway network near the project site or result in any meaningful long-term or permanent change in VMT. However, as a standard condition of approval, and per comments received on the Notice of Preparation, the proposed project would be required to provide a CTMP to the County Department of Public Works, Traffic Division prior to the issuance of grading permits (see APM TRA-1, above). The CTMP will include the number of trucks, type of trucks (size), the total number of equivalent single-axle loads, and planned truck routes to the project site during construction. This information will be used to determine if a maintenance agreement is required to ensure all County-maintained roads utilized by project construction traffic remain in acceptable condition during construction.

Implementation of the CTMP would ensure that project construction would not result in any access or traffic issues on roads surrounding the project site, such that there would be a conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts during project construction would be **less than significant**.

The proposed project is a utility-scale solar and energy storage facility anticipated to be operational over a 30-year period. If no permit is extended beyond the 30-year period, the proposed project would cease

operation. All project components would be decommissioned, and the site would be restored to pre-project conditions. Although the number of workers and trucks required during decommissioning of the utility-scale solar and energy storage facility is not known at this time, it is likely that such activities would be similar to the construction activities described above. Therefore, with incorporation of APM TRA-1, impacts during construction and decommissioning would be **less than significant**.

## Project Operation and Maintenance

The proposed solar and energy storage facility, including the substation, would be uncrewed during operation; however, a workforce of approximately 25 to 40 personnel would visit the site on an as-needed basis for maintenance, equipment operation, and/or security. The proposed solar and energy storage facility would be remotely controlled using a Supervisory Control and Data Acquisition (SCADA) system, eliminating the need for permanent on-site employees. It would not be accessible to the public, and access would be infrequent and limited to authorized personnel. Therefore, the proposed project would generate fewer than 110 daily vehicle trips on the surrounding roadway network as a result of routine O&M activities including solar panel washing, which is assumed to occur two times per year. From a daily and peak hour perspective, these trips are considered nominal and would not be expected to impact the existing road network near the project site, including I-15. The roadway network in the vicinity is characterized by free-flowing traffic conditions, and vehicles on the roadway generally travel unimpeded by others. Therefore, traffic during project operation would not conflict with the CTMP standards.

Vehicular access to the project site is currently provided via Rasor Road which also provides access to the Rasor OHV recreation area. Upon project buildout, the project site would be fenced off with vehicular access to be provided from existing Rasor Road at the southwestern corner of the project site. As described in Chapter 2, Project Description, Rasor Road would maintain recreationalist access to the Rasor OHV recreation area (see APM TRA-2, above). With incorporation of APM TR-2, temporary impacts would be reduced, and construction of the proposed project would have a less-than-significant impact related to applicable plans, ordinances, or policies.

O&M of the project is expected to generate less than 110 daily one-way trips, which is considered a nominal increase to existing daily traffic volumes. Furthermore, all access roads would be designed consistent with applicable County of San Bernardino and other standards. Therefore, operation would not disrupt any transportation facilities and would result in less-than-significant impacts to an applicable plan, ordinance, or policy.

There are unimproved roads on BLM land that are informally used by recreationalists and accessed via Rasor Road and Arrowhead Trail Road. Under the proposed plan, the project site would be fenced off, restricting access for recreationalists. Thus, to ensure satisfactory operation of the roadway network during construction, implementation of APM TRA-2 would require Rasor Road to maintain public access during project operation. Therefore, impacts to transit, roadway, bike, or pedestrian travel would be **less than significant.**

## COUNTYWIDE POLICY PLAN

**Goal TM-1**: Unincorporated areas served by roads with capacity that is adequate for residents, businesses, tourists, and emergency services.

> **Consistent**: The roadway network in the vicinity is characterized by free-flowing traffic conditions, with limited existing traffic. Project construction and operation vehicles would be considered nominal trips and would not be expected to impact the existing road network near the project site. Tables 3.17-2 and 3.17-3 provide the existing LOS and the LOS during project

construction at the Rasor Road/I-15 on- and off-ramp intersections and along three freeway segments. See Appendix M for detailed LOS calculations prepared in accordance with the *San Bernardino County Transportation Impact Analysis Guidelines* (San Bernardino County 2019).

Based on the analysis, project construction would generate up to 1,068 daily trips at the peak construction activity period. The LOS Desert Region standards from the County's TISG were used as a reference to identify acceptable intersection operations (LOS C or better) for general plan consistency. While traffic conditions at the Rasor Road study intersections would worsen, all but one study intersection would continue to operate at acceptable LOS and would not affect traffic on I-15. The I-15 southbound ramps at Rasor Road would operate at LOS E, with a predicted increase in delay of approximately 26.6 seconds per vehicle on the westbound approach of the I-15 southbound off-ramp. However, only eight vehicles are affected during peak hours, and the length of the off-ramp (1,450 feet) would contain the queue within the off-ramp area without affecting the freeway mainline. Furthermore, as shown in Table 3.17-3, although existing traffic conditions along the mainline segments of I-15 could worsen under project construction conditions all would continue to operate at LOS C or better except for the northbound and southbound segments of I-15 between Rasor Road and Zzyzx Road which currently operate at LOS D during midday and PM peak periods and would continue to do so during project construction. Despite falling below ideal performance standards, these temporary traffic conditions during construction are not considered a significant operational deficiency due to small number of vehicles affected, no queue spillback to the freeway mainline, and their temporary nature.

**Table 3.17-2. Existing and Project Construction (Temporary) Intersection LOS**

| Intersection | Control Type | AM Peak | | Midday Peak | | PM Peak | |
|---|---|---|---|---|---|---|---|
| | | Existing | Project | Existing | Project | Existing | Project |
| I-15 northbound ramps and Rasor Road | SSSC | A | C | A | A | A | C |
| I-15 southbound ramps and Rasor Road | SSSC | A | B | A | A | A | **E** |

Notes: SSSC = Side-Street Stop-Controlled; Bold lettering indicates an intersection that does not meet the Desert Region LOS standard (LOS C)

**Table 3.17-3. Existing and Project Construction (Temporary) Freeway Segment LOS**

| Mainline Segment | AM Peak | | Midday Peak | | PM Peak | |
|---|---|---|---|---|---|---|
| | Existing | Project | Existing | Project | Existing | Project |
| I-15 northbound<br>Between Basin Road and Rasor Road | B | B | C | C | B | C |
| I-15 northbound<br>Between Rasor Road and Zzyzx Road | B | B | **D** | **D** | C | C |
| I-15 southbound<br>Between Basin Road and Rasor Road | B | B | C | C | C | C |
| I-15 southbound<br>Between Rasor Road and Zzyzx Road | B | B | C | C | **D** | **D** |

Notes: Bold lettering indicates an intersection that does not meet the Desert Region LOS standard (LOS C)

**Goal TM-2**: Roads designed and built to standards in the unincorporated areas that reflect the rural, suburban, and urban context as well as the regional (valley, mountain, and desert) context.

> **Consistent**: The project site is not located within a mobility focus area, and no major public transit stops are located within the vicinity. The proposed project also proposes improvement of a portion of Rasor Road, which is an existing dirt road, to ensure access to the Rasor OHV recreation area during construction, operation, and decommissioning. Construction activities associated with the road improvement would include grading to widen or level the existing road; importing and compacting materials, such as soil and gravel; and may include paving. The Rasor Road improvements may expand the roadway width up to approximately 26 feet wide and the roadway length along the new alignment by approximately 2.85 miles near the southwestern corner of the fenced project site. The road would be designed and built to BLM and County standards and would not impact public transit, pedestrian, or bicycle facilities in the vicinity of the project site (see APM TRA-2, above).

**Goal TM-3**: A pattern of development and transportation system that minimizes vehicle miles traveled.

> **Consistent**: See discussion under Impact TR-2, below.

**Goal TM-4**: On- and off-street improvements that provide functional alternatives to private car usage and promote active transportation in mobility focus areas.

> **Consistent**: The proposed project is not located within a mobility focus area. As previously described, the proposed project would not impact the local transportation network, bicycle facilities, and pedestrian facilities that serve unincorporated areas.

No public transit, pedestrian, or bicycle facilities currently exist on Rasor Road, Arrowhead Road, or in the vicinity of the project site such as Arrowhead Trail Highway. The proposed project would also not develop any new public roadways, transportation facilities, or transportation-related improvements.

As the proposed project would not develop a new roadway system or road improvements beyond those proposed for Rasor Road and would not bring additional employees to the project site, the proposed project would not conflict with any programs, plans, ordinances, or policies related to transportation. Impacts during project operation would be **less than significant**.

### *Impact TR-2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (Less than Significant)*

Impacts due to construction activities would be temporary and would not result in any meaningful long-term or permanent change in VMT; therefore, the evaluation of VMT is focused on project operations. Further, State CEQA Guidelines 15064.3(b) provides that construction traffic may be analyzed qualitatively. VMT primarily is a metric for assessing project-related GHG emissions impacts. The analysis related to GHG emissions associated with project-related construction and operational traffic is provided in Section 3.8, Greenhouse Gas Emissions, of this draft EIR. Overall, as the proposed project would generate clean renewable energy that would offset GHG emissions that would have otherwise resulted from producing energy from a nonrenewable source, the proposed project would have a net beneficial impact in offsetting GHG emissions.

As previously stated in Section 3.17.1.3, according to the County's TISG, land use projects that meet certain screening criteria are assumed to result in a less-than-significant transportation impact under CEQA and do not require a detailed quantitative VMT assessment.

After the completion of construction, the utility-scale solar and energy storage facility would not be accessible to the public, and access would be infrequent and limited to authorized personnel. The utility-scale solar and energy storage facility would be remotely controlled, eliminating the need for on-site employees. A workforce of approximately 25 to 40 professional staff, and maintenance and security personnel who would visit the project site on an as-needed basis for maintenance, equipment operation, and/or security is anticipated with more workers on panel washing and cleaning days, which would occur two times per year over a 3-week period. Primary security monitoring would also be conducted remotely. However, security personnel would perform unscheduled rounds and respond to alarms or fence breaches when necessary. Given that the solar facility would be remotely controlled, the proposed project is anticipated to generate less than 110 daily one-way trips during operation and meet the trip generation threshold screening criteria. Table 3.17-4 details the County's TISG screening criteria and whether the proposed project would meet the criteria.

**Table 3.17-4. Summary of VMT Screening Determination**

| Screening | Screening Criteria | Project Evaluation | Criterion Met? |
|---|---|---|---|
| Local Community Projects | The following list of projects would be screened out:<br>• K-12 schools<br>• Local-serving retail less than 50,000 square feet<br>• Local parks<br>• Day care centers<br>• Local-serving gas stations<br>• Local-serving banks<br>• Student housing projects<br>• Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS | The proposed project is a utility-scale solar and energy storage facility and is not considered a local community project. Therefore, the proposed project is not screened out under this criterion. | No |
| Trip Generation Threshold | Projects generating less than 110 daily vehicle trips such as:<br>• 11 single family housing units<br>• 16 multi-family, condominiums, or townhouse units<br>• 10,000 square feet of office<br>• 15,000 square feet of light industrial<br>• 63,000 square feet of warehouse<br>• 79,000 square feet of high cube transload and short-term storage warehouse<br>• 12 hotel rooms | The proposed project would operate primarily remotely and thus generate less than 110 daily vehicle trips. Therefore, the proposed project would screen out of a detailed VMT analysis. | Yes |
| Transit Priority Area | Projects located within a TPA as determined by the most recent SCAG RTP/SCS | The proposed project is not located within a TPA. | No |
| Low-VMT Area | Projects located within a low-VMT-generating area as determined by the analyst based on the County's VMT efficient area maps online[1] | The proposed project would likely generate more daily total VMT since the land is currently open area and is not screened out under this criterion. | No |

[1] SBCTA VMT screening tool, available at: https://sbcta-gis.sanbag.ca.gov/gisportal/apps/webappviewer/index.html?id=3cd02c669e3442e79f732be92d26d320

The proposed project screens out based on the trip generation threshold (i.e., less than 110 daily vehicle trips for project operations), and a detailed quantitative VMT assessment is not required. Therefore, the proposed project is considered to have a less-than-significant VMT impact and would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3 (b) and the impact would be **less than significant**.

### *Impact TR-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)? (Less than Significant)*

The proposed project is similar to other utility-scale renewable energy facilities along the I-15 corridor in this portion of unincorporated San Bernardino County; thus, it would be compatible with the uses in the vicinity. As discussed, primary access to the project site would be provided via the existing Rasor Road that runs from I-15 eastward to the Rasor OHV recreation area.

The portion of Rasor Road that would serve as the entrance and primary access road within the project site is approximately 0.4 mile in length and oriented north-south. The proposed project would maintain and improve this portion of Rasor Road to be 20 feet wide and include a gated entrance to the project site accessed approximately 250 feet southeast from the I-15 northbound off-ramp at Rasor Road. The Rasor Road primary access road would intersect an internal access road leading to the substation. Internal access roads would be developed between the proposed arrays to provide vehicular access to solar equipment (photovoltaic modules, inverters, transformers) for O&M activities. They would be 16 feet wide and include a 35-foot turning radius at the project boundary and be designed consistent with the amount and type of use expected.

The existing portion of Rasor Road that continues past the internal access road would continue to serve as the main access to the Rasor OHV recreation area. Although the proposed project would close Rasor Road during construction, it would reopen during project operation to maintain public access (see APM TRA-2, above). The proposed project does not include any other improvements to the remainder of Rasor Road. A site plan and Google Earth review indicates an absence of visual obstructions and no significant topography changes at and around the primary access point for the proposed facility (Rasor Road). Additionally, the site plan indicates that there would not be any landscaping or other structural additions that would obstruct sight distance. Heavy vehicles heading to the site would have adequate spacing given the wide access at the project access point. Because truck trips associated with the construction and decommissioning of the proposed facilities on the project site would temporarily change the mix of vehicle types on area roads traffic safety hazards could occur due to

1. conflicts where construction vehicles access a public ROW from the project site;
2. conflicts where road width is narrowed; or
3. increased truck traffic in general (and their slower speeds and wider turning radii) during construction and decommissioning.

As discussed in the TIS (see Appendix M), increases in weekday peak-hour traffic volumes resulting from construction- and decommissioning-related traffic would not be substantial relative to the background traffic volumes on roads used to access the site. However, to minimize adverse effects of project construction traffic, the applicant would prepare a CTMP (see APM TRA-1, above) for County review and approval prior to commencement of construction activities.

Implementation of APM TRA-2 and other Rasor Road improvements and development of perimeter and internal roadways for operations would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections). Implementation of APM TRA-1 would limit potential traffic-related conflicts. Thus, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be **less than significant**.

### *Impact TR-4: Would the project result in inadequate emergency access? (Less than Significant)*

Because of the short-term nature of construction activities (approximately 18 months), the proposed project's construction activities would not require a new, or significantly interfere with an existing, risk management, emergency response, or evacuation plan for the project site.

Primary access to the project site during construction and decommissioning would be through a gated entrance from Rasor Road. Access to construction and decommissioning activities associated with the proposed gen-tie line and switchyard on the north side of I-15 would be from Arrowhead Trail Highway or the LADWP/SCE transmission maintenance road, both of which run parallel to I-15. Construction of the proposed project would not be expected to require any temporary lane closures that could restrict the movements of emergency vehicles.

The proposed project includes implementation of a CTMP (see APM TRA-1 above) during grading and construction, including for the main access point from Rasor Road and when large deliveries in wide-load vehicles or a high volume of deliveries occurs. The CTMP will be prepared and submitted for County review prior to commencement of construction activities and will include construction traffic control measures to ensure that emergency access is maintained during project construction. The CTMP will include implementation of safety measures such as directing construction traffic with a flag person (as needed to maintain safety adjacent to existing roadways), placing temporary traffic control signage along access routes to indicate the presence of heavy vehicles and construction traffic, using escort vehicles for wide loads, and ensuring access for emergency vehicles to the project site. Future decommissioning impacts are anticipated to be similar to those of construction. Therefore, the proposed project would not result in inadequate emergency access during construction or decommissioning, and potential impacts would be less than significant.

The proposed project would not develop new public roads or introduce new hazards to roads leading to the project site, the Rasor OHV recreation area, or other sites in the immediate vicinity. During operation, maintenance activities would occur as needed at the project site but are not expected to require any temporary travel lane closures. As described above, vehicular access to the project site on south side of I-15 would be provided via Rasor Road and its north fork (Arrowhead Trail Road), with access to the project site on north side of I-15 provided via Rasor Road and Arrowhead Trail Highway. All emergency access would be provided via these access points. All roads interior to the project site would be constructed consistent with the County Fire Code. Therefore, the proposed project would not result in inadequate emergency access during operation, and potential impacts would be **less than significant**.

Thus, the proposed project would not result in inadequate emergency access during construction, operation, or decommissioning, and any potential impacts would be less than significant. See Section 3.9, Hazards and Hazardous Materials, and Appendix M for a discussion of the transport and handling of hazards and hazardous materials and APM HAZ-1 through APM HAZ-3. See Section 3.20, Wildfire, for a discussion of evacuation plans and potential routes and capacity in the case of a wildfire emergency.

## 3.17.4 Mitigation Measures

No mitigation measures are required.

## 3.17.5 Cumulative Impacts

### *Impact C-TR-1: Would the impacts of the proposed project, in combination with other past, present, and reasonably foreseeable future projects, contribute to a cumulative impact related to transportation? (Less than Significant)*

Chapter 3, Environmental Impact Analysis, of this draft EIR lists the projects with the potential to be considered in a cumulative context with the proposed project's incremental contribution. These projects are summarized in Table 3-1 and shown on Figure 3-1 (see Chapter 3). Each cumulative project considered in this analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the County, including a review of consistency with applicable policies. Similar to the proposed project, cumulative projects, especially those that are close geographically and would share the same set of local, regional, state and federal roadways such as the Brightline West – Las Vegas to Victory Valley High Speed Rail project, would likely implement a similar CTMP (see APM TRA-1) with construction traffic measures to ensure traffic LOS on I-15 mainline segments, at on- and off-ramps, and at intersections such as Rasor Road are maintained throughout construction activities to the maximum extent feasible. Coordination of these plans will ensure construction activities of concurrent cumulative projects and associated hauling activities (if any) are managed in collaboration with one another and the project. As the proposed project would not be inconsistent and would not conflict with the programs, plans, policies, and ordinances that are analyzed above, the proposed project in combination with the cumulative projects **would not create inconsistencies nor result in cumulative impacts** with respect to the identified programs, plans, policies, and ordinances.

Similar to the proposed project, any cumulative project that would be subject to environmental review would be required to evaluate VMT on a project-by-project basis. If the cumulative project were determined to have potentially significant VMT impacts, it would be required to include appropriate mitigation measures to reduce VMT impacts to a less-than-significant level to the extent feasible. As the proposed project would result in a less-than-significant impact to VMT, the proposed project would similarly result in a **less-than-significant impact** to VMT in cumulative conditions, and further analysis is not necessary.

With regard to geometric hazards, the proposed project would not result in a significant impact due to a design feature. Each cumulative project would be reviewed by the County to ensure compliance with applicable County requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other cumulative projects that could potentially lead to cumulative impacts is not expected. Therefore, there **would not be a significant cumulative impact** regarding geometric hazards, nor would the proposed project's potential contribution to cumulative impacts associated with hazardous design conditions be considerable.

With regard to emergency access, the proposed project would not result in a significant impact. The project site and the surrounding area are developed with existing roadway networks, and with existing routes for emergency vehicles and evacuation. Similar to the proposed project, cumulative projects would likely implement a similar CTMP (see APM TRA-1) to include construction traffic measures to ensure adequate emergency access is maintained in and around the cumulative project sites throughout construction activities. Coordination of these plans will ensure construction activities of concurrent cumulative projects and associated hauling activities (if any) are managed in collaboration with one another and the project. Therefore, there **would not be a significant cumulative impact** regarding emergency access, nor would the project's potential contribution to cumulative impacts associated with emergency access be considerable.

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