

### 3.1.9 Transportation and Traffic

This section of the Environmental Impact Report (EIR) evaluates impacts to the existing transportation network that may result directly or indirectly from the proposed project. The analysis is based on the review of existing resources, technical data, and applicable laws, regulations, and guidelines, as well as the following technical studies prepared for the project in accordance with the *County of San Diego Transportation Study Guidelines* (County of San Diego 2022), the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Transportation and Traffic* (County of San Diego 2009), and the *County of San Diego Guidelines for Determining Significance and Report Format and General Content Requirements – Wildland Fire and Fire Protection* (County of San Diego 2023a):

- *Starlight Solar Transportation Impact Assessment, County of San Diego, California* (Transportation Impact Assessment) (Kittelson & Associates, Inc. 2024) (Appendix K.1)
- *Starlight Solar Traffic Statement for Water Truck Change, County of San Diego, California* (Kittelson & Associates, Inc. 2025) (Appendix K.2)
- *Fire Protection Plan, Starlight Solar Project* (FPP) (SWCA Environmental Consultants 2024) (Appendix L)

Comments received in response to the Notice of Preparation (NOP) included concerns regarding the impact of construction traffic on local highways and potentially increased traffic during project operation. Preparation of a traffic impact study, a traffic control plan (TCP), and an encroachment permit for work within the California Department of Transportation (Caltrans) right-of-way (ROW) was also requested. These concerns are addressed in this section of the EIR where applicable and within the Transportation Impact Assessment (see Appendix K.1). Copies of the NOP and comment letters received in response to the NOP are included in Appendix A, Notice of Preparation, Initial Study, and Public Comments, of this EIR.

The County of San Diego's (County's) Transportation Study Guidelines provide thresholds of significance to evaluate transportation impacts related to a project's vehicle miles traveled (VMT) (County of San Diego 2022). According to the County's Transportation Study Guidelines, a project that meets at least one of the County's screening criteria would have a less-than-significant impact related to VMT due to project characteristics and/or location. According to the Transportation Impact Assessment, the project would meet the "small projects" VMT screening criteria, which exempts projects that generate or attract fewer than 110 vehicle trips per day from further VMT analysis (see Appendix K.1). However, on March 27, 2025, the Fourth District Court of Appeal upheld a writ petition claiming that two of the VMT screening thresholds included in the County's transportation guidelines were invalid, including the "small projects" screening criteria. The County has filed an appeal. Due to this court decision, the analysis pertaining to the "small projects" screening criteria and provided in the Transportation Impact Assessment for the proposed project was not included in this EIR section. As such, discussion of the "small projects" screening criteria is still included in the Transportation Impact Assessment, as the report was prepared prior to the Court of Appeal decision. The "small project" screening threshold is not used to determine transportation impacts under CEQA.

#### 3.1.9.1 Existing Conditions

The project site is approximately 588 acres in unincorporated San Diego County, south of the community of Boulevard and approximately 0.93 mile north of the U.S.–Mexico border. The community of Boulevard is approximately 65 square miles and includes the communities of Manzanita, Tierra del Sol, and Live Oak

Springs. Boulevard is a census-designated place with a population of approximately 410 people (U.S. Census Bureau 2023).

### Existing Freeway and Roadway Conditions

Regionally, the site is accessed by Interstate 8 (I-8). Local access to the project site would be provided by Ribbonwood Road/Jewel Valley Road, Old Highway 80, and Tule Jim Lane, as shown on Figure 1-2 in Section 1.0, Project Description, Location, and Environmental Setting. Tule Jim Lane is a private road and would only provide emergency access to the site. The following provides a description of the existing street system in the vicinity of the project site.

- **I-8:** This four-lane interstate freeway provides east-west traffic flow through the region, connecting San Diego and Imperial Counties and rural towns. I-8 has two traffic lanes in each direction with a posted speed limit of 65 miles per hour (mph). The section of I-8 in southeastern San Diego County is heavily used by recreational vehicles and container trucks and serves as a transportation route between California and Arizona. Freeway access to the project site is provided at the junction of State Route (SR) 94 and Old Highway 80. The annual average daily traffic volume on I-8 near the project site (at the junction of SR 94) is approximately 18,000 vehicles (Caltrans 2024a).
- **Old Highway 80:** The Mobility Element Network Appendix (County of San Diego 2014) of the *San Diego County General Plan: A Plan for Growth, Conservation, and Sustainability* (General Plan) (County of San Diego 2011b) classifies Old Highway 80 as a 2.2E Light Collector from the southern boundary of the Central Mountain Subregion to SR 94. Within the traffic study area, Old Highway 80 is a two-lane undivided roadway. Bike lanes are provided in both directions.
- **State Route 94:** SR 94 is classified as a 2.1D Community Collector (Improvement Options on passing lanes) (County of San Diego 2014). Within the traffic study area, SR 94 is a two-lane undivided roadway. Bike lanes are provided in both directions.
- **Ribbonwood Road/Jewel Valley Road:** This two-lane undivided road is classified as a Light or Minor Collector (County of San Diego 2014) and runs north to south. Ribbonwood Road connects with I-8 at its northern end and turns into Jewel Valley Road at Old Highway 80, continuing until county maintenance ends near the Empire Ranch airstrip and project site. From there, Jewel Valley Road continues as a dirt road and ends near hiking areas southeast of the project site.
- **Avenue de Robles Verdes:** Avenue de Robles Verdes is classified as a local public road and has two travel lanes (one lane in each direction). It provides access to areas west of its intersection with State Route 94. The posted speed limit is 30 mph.
- **Tule Jim Lane:** Tule Jim Lane provides north-south connection from Old Highway 80 to the project site. It is an unpaved road that provides access to residences located to the north and east of the project site and is not anticipated to have project traffic.

### Pedestrian and Bicycle Facilities

The Jewel Valley Road Pathway is planned as part of the County's community trails master plan (County of San Diego 2020); however, it would not be included in the proposed project. If completed, the pathway would be constructed along the section of Jewel Valley Road that intersects the project site, entirely within the existing County right-of-way (County of San Diego 2005). It is estimated to be 3.20 miles once completed and would primarily act as a north-south connector for other proposed and existing trails in the area. Pathways are defined as a non-motorized transportation facility located within a parkway or road ROW. They are intended to serve both circulation and recreation purposes and are an integral part of a functional trail system. There are no other existing or planned pedestrian or bicycle facilities in the project vicinity.

## **Transit and Rail Facilities**

The San Diego Metropolitan Transit System (MTS) Bus Route 888 operates only on Mondays and Fridays and provides service between the Westfield Parkway Plaza in El Cajon and Jacumba Hot Springs. The nearest transit stops to the project site are along Old Highway 80, approximately 700 feet east of Jewel Valley Road and approximately 5,000 feet northwest of the project site (MTS 2024).

The project site includes an easement for the Desert Line of the San Diego & Arizona Eastern Railway, which originates in San Diego and terminates in El Centro. The project would span the railroad in the southern portion of the site. Construction of the railway was initiated in 1907; MTS has owned the Desert Line portion of the railway since 1979 (MTS 2013). Currently there is no service on the Desert Line due to concerns associated with the safety of the bridges and overpasses along the rail lines.

## **Planned Roadway Improvement Projects**

There are no planned roadway improvement projects in the vicinity of the project site.

### **3.1.9.2 Regulatory Setting**

#### **Federal Regulations**

Title 49 of Code of Federal Regulations 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 govern the transportation of hazardous materials, including types of materials and marking of the transportation vehicles.

#### **State Regulations**

##### **California Senate Bill 743**

On September 27, 2013, Senate Bill (SB) 743 was signed into law and required the Governor’s Office of Land Use and Climate Innovation (LCI), formerly known as the Office of Planning and Research (OPR), to amend the State California Environmental Quality Act (CEQA) Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. The updates to the State CEQA Guidelines required under SB 743 were approved on December 28, 2018. Under the new guidelines, LOS, or automobile delay, is not considered an environmental impact under CEQA, and VMT has been adopted as the most appropriate measure of transportation impacts under CEQA.

##### **California Department of Transportation**

Caltrans is responsible for planning, designing, building, operating, and maintaining California’s State Highway System. Caltrans sets standards, policies, and strategic plans that aim to provide the safest transportation system in the nation for users and workers; maximize transportation system performance and accessibility; efficiently deliver quality transportation projects and services; preserve and enhance California’s resources and assets; and promote quality service (Caltrans 2002).

In anticipation of SB 743 implementation, Caltrans released the draft *Transportation Impact Study Guide* (TISG) in February 2020 (Caltrans 2020). Per the 2020 TISG, Caltrans’ primary review focus is now VMT, replacing LOS as the metric used in CEQA transportation analyses. The project site is located within Caltrans District 11. Caltrans recommends use of LCI’s recommended thresholds for land use projects and recommends following the guidance on methods of VMT assessment found in LCI’s Technical Advisory (OPR 2018). The Caltrans 2020 TISG and 2024 *Local Development Review (LDR) Safety Review*

*Practitioners Guidance* (Caltrans 2024b) replaced Caltrans' 2002 *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2002). Caltrans anticipates finalizing the second editions of its *Transportation Analysis Framework* and *Transportation Analysis Under CEQA* in 2025 (Caltrans 2025); these documents include updated guidance on the evaluation of transportation impacts on the State Highway System.

## Local Regulations

### County of San Diego Consolidated Fire Code

In collaboration with local fire protection districts, the County created the first Consolidated Fire Code in 2001, with the most recent update in 2023. The Consolidated Fire Code includes the County's and fire protection districts' amendments to the California Fire Code. Emergency ingress and egress are established by the County's Consolidated Fire Code, which are essential for both citizen evacuation and providing access for emergency vehicles during a fire or other emergency. Section 503 of the Consolidated Fire Code specifies minimum design standards for "Fire Apparatus Access Roads" and includes minimum road standards, secondary access requirements, and restrictions for gated roads (County of San Diego 2023b).

### County of San Diego Department of Public Works – Permit Requirements

The County requires an encroachment permit for the placement of any structures on, over, or under County-owned or -maintained roads (County of San Diego 2024). Project construction could affect roadways owned and maintained by the County. Encroachment permits are issued by the Department of Public Works for the installation of any tower, pole, or structure of any kind within, over, or under a county road ROW. In addition to encroachment permits, the Department of Public Works requires a construction permit prior to initiation of any work within the County ROW, and a traffic control permit is typically required in concurrence with an encroachment and/or construction permit to ensure the safe travel of vehicles within a construction work zone.

### San Diego Association of Governments 2021 Regional Plan

The San Diego Association of Governments (SANDAG) *2021 Regional Plan* (SANDAG 2021) provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies.

## **3.1.9.3 Analysis of Project Effects and Determination as to Significance**

### Guidelines For Determination of Significance

For the purpose of this EIR, Appendix G of the State CEQA Guidelines (14 California Code of Regulations 15000 et seq.) and the County's transportation study guidelines (County of San Diego 2022) apply to both the direct impact analysis and the cumulative impact analysis. Specifically, the project would be considered to have a significant impact related to transportation if it would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- Conflict or be inconsistent with State CEQA Guidelines 15064.3(b).

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

Additionally, the transportation study guidelines (County of San Diego 2022) identify requirements for conducting VMT analyses for projects in accordance with SB 743, Public Resources Code Section 21099 and the State CEQA Guidelines Section 15064.3(b). The Transportation Impact Assessment (see Appendix K.1) was prepared for the proposed project in accordance with these guidelines.

### Program, Plan, Ordinance, or Policy Consistency

#### Guidelines for the Determination of Significance

A project would have a significant impact if it would:

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

#### Analysis

The County's General Plan Mobility Element is discussed in Section 3.1.6, Land Use and Planning, of this EIR.

During the construction and decommissioning phases of the project, there may be construction work or construction-related traffic that could temporarily impede movement of vehicles, transit, bicyclists and/or pedestrians. Project design features **PDF-TR-1** (Traffic Control Plan), **PDF-TR-2** (Preparation of Construction Notification Plan), and **PDF-TR-3** (Notification of Property Owners and Provision of Access), discussed in Section 3.1.9.5, Project Design Features, will be prepared to ensure the safe and efficient movement of traffic through the project area and proper notification to local residents/motorists of construction activities that could affect daily travel through the area. The TCP (**PDF-TR-1**) would be prepared in consultation with the County and would contain information regarding noticing, signage, policy guidelines, roadway characteristics, and the limitation of lane closures to off-peak hours. Additionally, a single point of contact will be established using the County's Private Development Construction Inspection process, which ensures construction work in San Diego County is completed per approved plans and state and county requirements to assure safe communities and roads are provided for the public (County of San Diego 2025).

Beyond the proposed Jewel Valley Road Pathway along Jewel Valley Road, there are no other pedestrian or bicycle facilities in the project area. If construction or operation of the pathway overlapped with project construction, **PDF-TR-1** and **PDF-TR-2** would require coordination to ensure no disruption would occur. Otherwise, the project would not affect pedestrian or bicycle facilities.

Due to the nature of the project, the trips generated during the construction and future decommissioning phases would be short-term and temporary, and **PDF-TR-1**, **PDF-TR-2**, and **PDF-TR-3** will be implemented by the Applicant to avoid significant impacts of temporary construction trips. The project would be unoccupied and remotely operated, therefore trips generated during operation would be nominal. Therefore, the project would not have the potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the impact would be **less than significant**.

## Vehicle Miles Traveled

### Guidelines for the Determination of Significance

Pursuant to Appendix G of the State CEQA Guidelines, a project would have a significant impact on the environment if it would

- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

State CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. Section 15064.3(b) is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The project would involve construction that would generate temporary construction-related traffic and nominal operations traffic. Section 15064.3(b)(3) recognizes that lead agencies may not be able to quantitatively estimate VMT for every project type and states that, for many projects, a qualitative analysis of construction traffic may be appropriate.

The County's transportation study guidelines provide thresholds of significance to evaluate transportation impacts related to a project's VMT (County of San Diego 2022). The *Technical Advisory on Evaluating Transportation Impacts in CEQA* also provides guidance for assessing the VMT impacts of land use projects (OPR 2018). As previously discussed, on March 27, 2025, a court decision found that two of the VMT screening thresholds included in the County's transportation guidelines, including the "small projects" thresholds, were invalid. As such, this analysis relies on the significance thresholds recommended by the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018). This guidance states "[p]rojects generating less than 110 daily vehicle trips (trips are based on the number of vehicle trips calculated using national [Institute of Transportation Engineers] ITE trip generation rates with any alternative modes/location-based adjustments are applied) may be presumed to have a less than significant impact absent substantial evidence to the contrary" (OPR 2018).

### Analysis

Notwithstanding the court decision and pending appeal described above, according to the County's transportation study guidelines, a project that meets at least one of the County's screening criteria, listed below, would have a less-than-significant impact to VMT impact due to project characteristics and/or location. Project type screening uses the following five screening criteria that assume the project to have a less-than-significant impact to VMT:

- Small projects: Projects that generate or attract fewer than 110 vehicle trips per day
- Small service/retail projects: Projects that are a service or retail use with 50,000 square feet gross floor area or less
- Mixed-use projects: Projects screened out based on their location on the SANDAG screening map for VMT/service population
- Local-serving retail/public facility/recreational: Projects that are locally serving and are either a retail or public service or recreational land use
- Redevelopment projects: Projects that replace an existing VMT-generating land use and do not result in a net overall increase or projects that redevelop an affordable housing site with all proposed units as affordable housing units

Additional screening criteria related to project location are also included if the project type is not screened out. These include considerations of VMT/resident, VMT/employee, and VMT/service population, based

on the County screening maps and the project location and type. However, this level of screening was not required of the proposed project, as the project would not result in new residents or permanent employees and would not generate a daily service population.

As the outcome of the County appeal on the Fourth District Court decision is uncertain as of the date of this analysis, it is important to note that a review of the County's transportation study guidelines indicates that the project meets the VMT screening criteria for small projects. The project would generate nominal daily primary vehicle trips once operational. Construction traffic is not considered for VMT analyses due to its temporary effect on the roadway network. Therefore, when applying the County's transportation study guidelines, the project is presumed to have a **less-than-significant** impact on VMT and is exempt from detailed VMT analysis.

In the event that the County's transportation study guidelines are not upheld as a result of the Fourth District Court decision, the project is also evaluated against significance thresholds recommended by the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018). This analysis is provided below.

### **Construction and Decommissioning**

Construction and decommissioning traffic is not typically considered for VMT analyses due to its temporary effect on the roadway network. Once construction is complete, the VMT from construction-related traffic would cease, and VMT would return to pre-project levels. The County transportation study guidelines do not require a quantitative VMT analysis for construction traffic, and neither LCI nor the County has specified models or methods to estimate VMT or VMT thresholds of significance for construction traffic, as it is a temporary condition on the network.

Over the construction and decommissioning periods, the project would require truckloads of construction materials and water for dust suppression and would also generate trips from the arrival and departure of construction workers. During Phase I of construction, the project would generate 90 round-trip worker vehicle trips, 164 round-trip heavy-duty truck trips, and four round-trip water truck trips per day, on average. During Phase II, the project would generate 225 round-trip worker vehicle trips, 466 round trip heavy-duty truck trips, and eight round-trip water truck trips per day, on average (see Appendix K.1 and Appendix K.2).

The project would use a just-in-time delivery system with supplies and components delivered on a schedule to minimize on-site storage needs. Once construction is completed, the construction-related traffic would stop, and traffic would return to preconstruction conditions. Activities associated with decommissioning would not include substantial earthmoving, such as grading, and are not expected to require significant numbers of truck trips. As such, daily truck trips during decommissioning would be expected to be similar or less than the numbers of trips required during construction. Therefore, the proposed project's construction and decommissioning VMT would not conflict with or be inconsistent with State CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3), and impacts would be **less than significant**.

### **Operations**

After the completion of construction, the project 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 daily on-site employees. Operationally, the project would generate occasional trips related to site and photovoltaic (PV) panel maintenance. As a part of routine maintenance, the PV solar panels would be washed once per year, and security personnel may access the site to respond to alarms and fence breaches, if necessary.

For operational impacts, LCI's guidance states "[p]rojects generating less than 110 daily vehicle trips (trips are based on the number of vehicle trips calculated using national [Institute of Transportation Engineer] ITE trip generation rates with any alternative modes/location-based adjustments are applied) may be presumed to have a less than significant impact absent substantial evidence to the contrary" (OPR 2018). According to the *ITE Trip Generation Manual, 11th Edition*, utility projects are expected to generate 3.85 daily trips per employee (ITE 2021). As the proposed project would not include permanent employees, the project would not be expected to generate new daily vehicle trips during typical operations. While routine maintenance, annual panel washing, and site visits from security personnel would generate some trips, these trips would not occur on a daily basis and would therefore fall below LCI's 110 daily vehicle trip threshold.

Because of the minimal trips associated with operation, the proposed project would not generate a significant amount of VMT and would not conflict with or be inconsistent with State CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3). Therefore, as trips generated during operation would be nominal, the project would have a **less-than-significant** impact related to VMT.

## Hazards

### Guidelines for the Determination of Significance

Pursuant to Appendix G of the State CEQA Guidelines, a project would have a significant impact on the environment if it would

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

The determination of significant hazards to an existing transportation design feature shall be on a case by-case basis, considering the following factors (County of San Diego 2009):

- Design features or physical configurations of an access road that may adversely affect the safe transport of vehicles along the roadway;
- The percentage or magnitude of increased traffic on the road that would affect the safety of the roadway;
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle conflicts with other vehicles or stationary objects;
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

The determination of significant hazards to pedestrians or bicyclists shall be on a case by-case basis, considering the following factors (County of San Diego 2009):

- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.
- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.



- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable. The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

## Analysis

Potential road hazards can occur due to a design feature or physical configuration of existing or proposed roads that can adversely affect the safe transport of vehicles along a roadway. The project does not propose any changes to the roadway design of Jewel Valley Road, Tule Jim Lane, or Old Highway 80. There are currently no known hazards, and the project would not increase hazards along these existing roadways.

Project-related traffic would use I-8 for regional travel and Ribbonwood Road/Jewel Valley Road and Old Highway 80 for accessing the project site. It is anticipated that during peak construction, approximately 225 workers would be working across the site. Workers would arrive and depart between 6:00 a.m. and 4:00 p.m., for a 7:00 a.m. to 3:00 p.m. workday during the construction period. A typical construction day would generate approximately 100 to 200 trucks, which would include the transportation of parts; movement of heavy equipment; and use of dump trucks, concrete trucks, water trucks, and subcontractor trucks.

The project would involve construction of access roads and improvements to provide access and circulation within the project site. Adequate sight distance would be required at all new roadways to the satisfaction of the County Director of the Department of Public Works, and all improvements would be constructed according to County private road standards (County of San Diego 2012). As discussed in the Transportation Impact Assessment (see Appendix K.1), the project included a site access analysis which reviewed site access, project queues, and operational needs to determine if the project requires additional considerations to operate functionally. The three proposed new site access points include a minimum of 300 feet of unobstructed sight distance in both directions, in compliance with County standards. The operational analysis found that delays would be minimal at the site access locations and that turn lanes along Jewel Valley Road would not be needed. This is primarily due to the very low volumes on this section of Jewel Valley Road (see Appendix K.1).

The project would not introduce curves, slopes, walls, or other barriers that would create potential conflicts between vehicles or potential conflicts between vehicles and stationary objects. Access road design would comply with County private road standards and allow passage of construction vehicles, including oversized trucks. Further, all intersections would operate at acceptable levels during both the morning and afternoon peak periods during peak construction traffic.

To ensure that construction-related activities and traffic do not cause a hazardous condition, the Applicant will prepare a TCP as specified by **PDF-TR-1**. The TCP would address construction traffic on both regional and local roads in the project area. The inclusion of **PDF-TR-1** would ensure that trucks, or any other construction equipment, would not create a safety hazard and/or be a temporary inconvenience to travelers along regional and local roadways. The County-required TCP would address the increased traffic anticipated on local area roadways during project construction and would contain measures for construction noticing, signage, and policy guidelines. For the State Highway System, Caltrans requires a TCP to be submitted to District 11's Transportation Permits Issuance Branch at least 30 days prior to the start of any construction. In addition, **PDF-TR-2** and **PDF-TR-3** would ensure that property owners and others who may be affected during project construction would be notified to address potential conflicts that may arise between construction traffic and day-to-day traffic on local area roadways, ensuring the safe and efficient movement of traffic through the project area. Therefore, impacts would be **less than significant**.

## Emergency Access

### Guidelines for the Determination of Significance

Pursuant to Appendix G of the State CEQA Guidelines, a project would have a significant impact on traffic and transportation if the project would result if the project would

- Result in inadequate emergency access.

### Analysis

During construction and decommissioning, as part of **PDF-TR-1** (TCP), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction activities. This would ensure that the project would not result in inadequate emergency access during construction.

The project would be autonomous, and no person would be on-site during project operation, except for routine maintenance. Panel washing would occur up to once per year. Emergency access to the project site would be provided via Jewel Valley Road and Tule Jim Lane. Jewel Valley Road is paved in certain segments and is otherwise a flat, well-maintained dirt road. Tule Jim Lane is also a well-maintained dirt road. Both roads have widths in all areas that can accommodate two-way traffic of emergency vehicles and connect to Old Highway 80 in the community of Boulevard. Each site entrance would feature a manual swing gate and a sign with a lighted directory map and contact information. All entrance gates would feature a Knox Box (a secure key box which stores keys and access cards for fire and emergency services) to allow ease of access for emergency service providers. Parking is proposed near the battery storage areas and near the existing Boulevard substation. The project would include dual-purpose internal fire response access and service access roads. In accordance with Section 503 of the San Diego County Fire Code, the perimeter internal access within the fenced solar facility would be constructed to a minimum improved width of 24 feet (County of San Diego 2023b). The interior on-site vehicle access roads would be constructed to a minimum improved width of 20 feet. All internal access would be designed to provide a minimum inner turning radius of 28 feet, would be graded and maintained to support the imposed loads of fire apparatus (not less than 75,000 pounds), and would be designed and maintained to provide all-weather driving capabilities. All internal access road surfaces would be consistent with the Caltrans Class II standard construction specifications and would be composed of permeable decomposed granite.

The County guidelines also require the preparation of a FPP for any project in an area designated as a High or Very High Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). As the project is in a High FHSZ, the FPP (see Appendix L) was prepared and would be evaluated concurrently with this EIR. The FPP was accepted by the San Diego County Fire Protection District (SDCFPD) in February 2024. The County's General Plan designates land uses within the project site as Rural Lands 80 (RL-80) and Semi-Rural Residential (SR-10) (County of San Diego 2011b). Policy S-7.3 of the Safety Element of the General Plan requires that new development demonstrate that fire services can be provided within minimum travel times (County of San Diego 2021). The project site is classified as outlying (SR-10) with a travel time standard of 20 minutes and as desert/wilderness (RL-80) with a travel time standard greater than 20 minutes. The project site is within SDCFPD jurisdiction and has one fire station within a 5-minute drive time, two stations within a 10-minute drive time, and an additional station within a 15-minute drive time. Multiple fire stations—CAL FIRE, SDCFPD, and the Bureau of Indian Affairs Campo Reservation—are within the 20-minute travel time standard for SR-10 and thus also meet the requirement for RL-80 (see Appendix L). Section 2.7, Wildfire, presents further analysis related to the FPP prepared for the project.

As stated in Section 3.1.5, Hazards and Hazardous Materials, emergency response coordinated by the County fire and police protection would remain the same as under existing conditions because the response time and distance would remain the same. The project site is accounted for in the County's *Multi-Jurisdictional Hazard Mitigation Plan* (County of San Diego 2023c) and in the established emergency response procedures, evacuation routes, and mutual aid agreements for emergency assistance. The proposed project would not result in inadequate emergency access, and impacts would be **less than significant**.

### **3.1.9.4 Cumulative Impact Analysis**

The cumulative impact analysis for transportation was performed using the projects listed in Table 1-4, in Chapter 1.0, Project Description, Location, and Environmental Setting.

#### **Cumulative, Program, Plan, Ordinance, or Policy Consistency**

Each cumulative project would be separately reviewed and approved by the County, including a review of consistency with applicable policies. Similar to the proposed project, cumulative projects would also be required to develop a TCP. Coordination of these plans would ensure construction activities of concurrent cumulative projects, and associated hauling activities (if any) would be managed in collaboration with one another and the project. Thus, the project, in combination with cumulative projects, **would not result in a cumulatively considerable impact** regarding conflict with any applicable programs, plans, policies, and ordinances.

#### **Cumulative, Vehicle Miles Traveled**

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 previously discussed, construction traffic is not considered for VMT analyses due to its temporary effect on the roadway network. Further, the project would generate nominal daily primary vehicle trips once operational. Other projects in the area are similar in nature, including solar and wind development projects, which would also generate nominal vehicle trips due to the minimal amount of workers required for daily operations. The operation of the project would generate fewer than 110 daily vehicle trips and would thereby meet the County's VMT screening criteria for small projects, as well as LCI's 110 daily vehicle trip threshold. Thus, the project, in combination with cumulative projects, **would not result in a cumulatively considerable impact** regarding VMT.

#### **Cumulative, Hazards**

With regard to design hazards, the proposed project would not result in a significant impact due to project design features **PDF-TR-1**, **PDF-TR-2**, and **PDF-TR-3**. 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, pedestrians, and bicyclists. Furthermore, since modifications to access and circulation plans are largely confined to the project site and immediate surrounding area, a combination of impacts with other cumulative projects that could lead to cumulative impacts is not expected. Thus, the project, in combination with cumulative projects, **would not result in a cumulatively considerable impact** regarding hazardous conditions due to design features.

### Cumulative, Emergency Access

As part of **PDF-TR-1**, the Applicant will establish procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities. The project site and the surrounding area are developed with existing roadway networks and existing routes for emergency vehicles and evacuation. Similar to the proposed project, cumulative projects are required to prepare a fire protection plan, which would include construction traffic measures to ensure adequate emergency access is maintained in and around the cumulative project sites throughout construction activities (see Appendix L). Coordination of these plans would ensure construction activities of concurrent cumulative projects and associated activities are managed in collaboration with one another and the project. Thus, the project, in combination with cumulative projects, **would not result in a cumulatively considerable impact** regarding emergency access.

#### **3.1.9.5 Project Design Features**

All transportation impacts resulting from implementation of the project were determined to be less than significant; therefore, no mitigation measures are required. Regardless, the Applicant has identified and committed to including the following project design features as part of the project to ensure that impacts during construction and decommissioning would be less than significant.

**PDF-TR-1 Traffic Control Plan.** Prior to obtaining a grading permit from the County of San Diego, the Applicant will implement a construction Traffic Control Plan (TCP) that includes the following measures:

1. Temporary traffic control devices in accordance with the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Device to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control flaggers, and any additional measures required for the sole convenience of safely passing non-construction traffic (including transit, bicyclists, and pedestrians) through and around construction areas.
2. Coordination with Caltrans to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary.
3. Notification of the California Highway Patrol, if necessary, to facilitate slowing freeway traffic to ensure safe access for motorists.
4. Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's department. For the State Highway System, Caltrans requires a TCP to be submitted to District 11's Transportation Permits Issuance Branch at least 30 days prior to the start of any construction.
5. Employment of a contract transport company that will be responsible for surveying the route to determine how turns on existing roads will be accomplished and ensuring that is reflected in the TCP.
6. Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities.

**PDF-TR-2      Preparation of Construction Notification Plan.** Forty-five days prior to construction or decommissioning activities, the Applicant will prepare and submit a construction notification plan to the appropriate land use jurisdiction agency for approval. The construction notification plan will identify the procedures that will be used to inform property owners of the location and duration of construction, identify approvals that will be needed prior to posting or publication of construction notices, and include text of proposed public notices and advertisements. The construction notification plan will address at a minimum the following components:

1. *Public notice mailer.* A public notice mailer will be prepared and mailed no fewer than 15 days prior to construction. The notice will identify construction activities that will restrict, block, remove parking, or require a detour to access existing residential properties. The notice will state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. The Applicant or construction contractor will mail the notice to all residents or property owners within 1,000 feet of project components. If construction delays of more than 7 days occur, an additional notice will be prepared and distributed.
2. *Public liaison person and toll-free information hotline.* The Applicant will identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person will be included in notices distributed to the public. The Applicant will also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. Procedures for handling and responding to calls will be addressed in the construction notification plan.

**PDF-TR-3      Notification of Property Owners and Provision of Access.** To facilitate access to properties that might be obstructed by construction or decommissioning activities, the Applicant will notify property owners and tenants at least 24 hours in advance of construction activities and will provide alternative access if required.

### **3.1.9.6      Conclusion**

#### **Program, Plan, Ordinance, or Policy Consistency**

Project trips during construction would be temporary. During operations, the trips would be minimal. Cumulative energy projects in the area would also generate trips during construction that would be temporary and short-term. As a uniformly applied development standard, the Applicant is required by the County to develop a TCP to provide safe and efficient traffic flow in the area and on the project site prior to and during construction. The TCP would be prepared in consultation with the County and would contain project-specific measures for noticing, signage, policy guidelines, and the limitation of lane closures to off-peak hours. The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be **less than significant**.

#### **Vehicle Miles Traveled**

Construction-related VMT would be temporary and short-term. Once construction is completed, the VMT from construction-related traffic would cease and the VMT would return to pre-project levels.

Operationally, the project would generate occasional trips related to site and PV panel maintenance. However, these trips would be infrequent would result in a nominal increase in VMT. The operation of the project would generate a less than significant number of daily trips (i.e., less than 110 daily vehicle trips). As such, the proposed project would not conflict with or be inconsistent with State CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3), and impacts would be **less than significant**.

### Hazards

The cumulative projects in the project area would comply with existing regulations for grading and building permits from the County, provide for traffic control and safety, and address design hazards for road construction. Each cumulative project would use different access roads than those proposed for the project. All proposed driveways would be constructed to meet the requirements of the private or public road standards. Lastly, with implementation of project design features **PDF-TR-1**, **PDF-TR-2**, and **PDF-TR-3**, construction of the project would not significantly increase hazards during construction. Therefore, hazardous conditions due to design features would not occur and impacts would be **less than significant**.

### Emergency Access

The project would establish procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response and vehicle routes affected by construction activities. The project would include fire and emergency access and circulation throughout the site. The FPP (see Appendix L) would be used to reduce the risk of wildfire on the site during operations and construction and to improve emergency response. Further, the project site is accounted for in the County's *Multi-Jurisdictional Hazard Mitigation Plan* and in the established emergency response procedures, evacuation routes, and mutual aid agreements for emergency assistance. Lastly, as part of **PDF-TR-1**, the Applicant will establish procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities. Therefore, the proposed project would not result in inadequate emergency access, and impacts would be **less than significant**.