6.2 TRAFFIC AND TRANSPORTATION

The following sections discuss the Modified Project's impacts to traffic and transportation as compared to the Approved Project.

6.2.1 Summary of Project Changes Related to Traffic and Transportation

The Modified Project would reduce the traffic and transportation impacts identified for the Approved Project. The replacement of the SunCatcher technology with PV technology would reduce the peak construction and operation workforces, thereby reducing vehicle trip generation compared to the Approved Project. The technology change would also reduce the potential for glint and glare to affect rail transport traversing the Project site. The phasing change would reduce the need to use a the private crossing for major construction activities in the northern portion of the site instead of the permanent crossing anticipated by the Commission Final Decision.

Figure 2-2, Project Access and Layout, illustrates the roadway circulation system serving the Project site. The figure shows some minor alignment modifications of the main access road under the Proposed Project as compared to the alignment for the Approved Project.

6.2.2 Changes in Environmental Impacts

6.2.2.1 Construction Traffic

Table 6.2-1 summarizes the Approved Project's Peak Project Construction Trip Generation, contained in the Calico Solar AFC, which was the basis for the traffic analysis provided in the Supplemental Staff Assessment and the Commission Decision on the Approved Project, and Table 6.2-2 summarizes the Modified Project's updated Peak Project Construction Trip Generation.

TABLE 6.2-1
PROJECT CONSTRUCTION TRIP GENERATION (APPROVED PROJECT)

Vehicle Type	Peak Daily Trips	Morning Peak Trips			Evening Peak Trips		
		Inbound	Outbound	Total	Inbound	Outbound	Total
Construction worker vehicles[1]	1,462	731	0	731	0	731	731
Truck deliveries[2]	274	41	0	41	0	41	41
Total Trips	1736	771	0	771		771	771

Notes:

[1] Peak workforce was analyzed at 731 worker trips, it was conservatively assumed each driver traveled alone during both the morning (0700 to 0900) and evening (1600 to 1800) peak hours.

[2] Truck deliveries shown in the table were adjusted into PCE vehicles (3 PCE per truck). 1,099 truck trips per month = 3,297 PCEs divided by 24 working days = 137 PCE one-way trips or 274 round trips per day on average. It was also assumed that 30 percent of the truck delivery trips arrive during the morning peak hour and leave during the evening peak hour while the remaining deliveries (70 percent) would arrive and leave during off-peak hours.

PCE = passenger car equivalent

TABLE 6.2-2
PROJECT CONSTRUCTION TRIP GENERATION (MODIFIED PROJECT)

Vehicle Type	Peak Daily Trips	Morning Peak Trips			Evening Peak Trips		
		Inbound	Outbound	Total	Inbound	Outbound	Total
Construction worker vehicles[1]	714	357	0	357	0	357	357
Truck deliveries[2]	108	54	0	54	0	54	54
Total Trips	822	411	0	411		411	411

Notes:

[1] Peak workforce was analyzed at 357 (Month 13) worker trips, it was conservatively assumed each driver traveled alone during both the morning (0700 to 0900) and evening (1600 to 1800) peak hours.

[2] Truck deliveries (Month 13) were adjusted into Passenger Car Equivalent (3 PCE) vehicles (18 Delivery vehicles x 3 PCE = 54 one-way or 108 round trips). Delivery trips were conservatively assumed to occur during both the morning inbound (0700 to 0900) and evening outbound (1600 to 1800) peak hours.

PCE = passenger car equivalent

A comparison of Table 6.2-1, Project Construction Trip Generation (Approved Project) and Table 6.2-2, Project Construction Trip Generation (Modified Project) shows that the

updated Peak Project Construction Trip Generation under the Modified Project would be less than half of the Peak Project Construction Trip Generation used as the basis for the Commission Final Decision for the Approved Project.

6.2.2.2 Operations Traffic

Table 6.2-3 summarizes the Project Operation Trip Generation upon which the Supplemental Staff Assessment and Commission Final Decision on the Approved Project were based. Table 6.2-4 summarizes the updated Project Operations Trip Generation for the Modified Project.

TABLE 6.2-3
PROJECT OPERATIONS TRIP GENERATION (APPROVED PROJECT)

Vehicle Type	Peak Daily Trips	Morning Peak Trips			Evening Peak Trips		
		Inbound	Outbound	Total	Inbound	Outbound	Total
Operations[1]	248	124	0	**124**	0	124	**124**
Deliveries[2]	36	9	6	**15**	0	6	**6**
Visitors	20	5	5	**10**	5	5	**10**
Total Trips	304	138	11	**149**	5	135	**140**

Notes:

[1] Peak workforce was analyzed at 124 worker trips, it was conservatively assumed each driver traveled alone during both the morning (0700 to 0900) and evening (1600 to 1800) peak hours. Note that this includes 120 workers (drive alone) plus 4 van pooling vehicles.

[2] Heavy trucks shown in the table were adjusted into Passenger Car Equivalent (3 PCE) vehicles (6 Delivery vehicles x 3 PCE = 18 one-way or 36 round trips).

PCE = passenger car equivalent

TABLE 6.2-4
PROJECT OPERATIONS TRIP GENERATION (MODIFIED PROJECT)

Vehicle Type	Peak Daily Trips	Morning Peak Trips			Evening Peak Trips		
		Inbound	Outbound	Total	Inbound	Outbound	Total
Operations[1]	60	30	0	30	0	30	30
Van Pool	4	2		2		2	2
Deliveries[2]	12	3	3	6	3	3	6
Visitors	20	5	5	10	5	5	10
Total Trips	96	40	8	48	8	37	48

Notes:

[1] Peak workforce was analyzed at 30 staff cars, it was conservatively assumed each driver traveled alone during both the morning (0700 to 0900) and evening (1600 to 1800) peak hours.

[2] Heavy trucks shown in the table were adjusted into Passenger Car Equivalent (3 PCE) vehicles (2 Delivery vehicles x 3 PCE = 6 one-way or 12 round trips).

PCE = passenger car equivalent

A comparison of Table 6.2-3 Project Operations Trip Generation (Approved Project) and Table 6.2-4 Project Operations Trip Generation (Modified Project) shows that the updated Project Operation Trip Generation would be about one-third of the Project Operation Trip Generation used as the basis for the Commission Final Decision for the Approved Project.

Based on the Project modifications described above, the Modified Project would result in traffic and transportation impacts less than those of the Approved Project. Each impact described in the Commission Decision, and the change in that impact that would result from the Modified Project, are described below.

- Project construction traffic impacts would decrease compared to the Approved Project, due to reduced trip generation.
- Project operations traffic impacts would decrease compared to the Approved Project, due to reduced trip generation.
- The modified Main Project Access Road within the Project site would not change the conclusions presented in the Commission Decision regarding traffic and transportation, including emergency services vehicle access.
- Due to the less reflectivity of the PV panels, the elimination of the SunCatchers on the Project site would reduce transportation impacts related to potential glint and glare impacts on BNSF train operators. As described in Section 6.5, K Road

Calico Solar LLC is completing a glint and glare study to demonstrate that the glint and glare from the Modified Project would not impact BNSF's operations

- The proposed Modified Project phasing would reduce construction-phase traffic safety concerns, including emergency services vehicle access, due to the ability of Phase 2 construction personnel and equipment to use a permanent bridge, rather than a temporary crossing, to cross to the north of the BNSF railroad.

Based on the information and conclusions provided above, the Modified Project will result in less traffic related impacts than the Approved Project.

6.2.3 Changes in Cumulative Environmental Impacts

The Commission Decision concluded that the Approved Project would not result in any significant cumulative impacts to traffic and transportation. Incremental impacts of the Modified Project on traffic and transportation are expected to be the same or slightly reduced compared to the Approved Project. As described in Section 1.4.1, Cumulative Scenario, no new reasonably foreseeable future actions beyond those assumed in the Commission Decision have been identified. Therefore, no increase in cumulative impacts under the Modified Project is anticipated.

6.2.4 Changes in LORS Conformance and Other Permits

In its Commission Decision, the Commission concluded that, with the implementation of the Conditions, the Approved Project would comply with all applicable LORS. As with the Approved Project, the Modified Project would comply with all applicable LORS, and no new or additional LORS have been identified.

6.2.5 Changes in Proposed Mitigation

No new or more severe impacts requiring additional mitigation would result from the Modified Project. The mitigation measures proposed in the Commission Decision would mitigate impacts associated with the Modified Project to levels that would be less than significant.

6.2.6 Changes in Conditions of Certification

TRANS-1 should be modified as follows consistent with the new phasing schedule. K Road Calico Solar LLC will propose revisions to Condition of Certification **TRANS-7** once the results of the glint and glare study are available.

TRANS-1– Construction of All-Weather Roads and Bridge. ~~If an easement is granted and the Applicant begins construction, the Applicant~~The project owner shall construct the main services road using asphalt or soil stabilizer such as Soiltac, and all other roads using Soiltac or its equivalent according to California State Fire

Marshall specifications as outlined in California Fire Code Section 902.2.1 et seq. These roads shall be constructed with appropriate materials so that they will be safe for use in crossing washes at the site.

In addition, the ~~Applicant~~Project owner shall coordinate its activities, relating to permanent crossing of the railroad, with the BNSF Railway. Those activities include working with the Public Utilities Commission to ensure compliance with provisions of the California Public Utilities Code Sections 1201- 1220.

During construction of ~~both~~ the ~~temporary and~~ permanent ~~road, temporary crossing of BNSF tracks, and permanent~~ crossing of BNSF tracks, the ~~Applicant~~Project owner shall prepare and coordinate with BNSF Railway; California Public Utilities Commission; and Federal Railroad Administration a safety plan for ensuring that all state and federal safety requirements for railroad crossings are followed.

That plan shall be reviewed and coordinated with BNSF Railway, appropriate regulatory agencies, and the CPM to ensure compliance with all state and federal requirements and approved by those agencies as well as the CPM.

Verification: At least 30-days prior to the start of ~~mobilization, right-of-way easements shall be obtained and presented to the CPM. In addition to the BSNF easement, the~~construction of permanent crossing, project owner shall provide ~~the~~to CPM a copy of right-of-way easements for the permanent crossing from BNSF and all documents pertaining to approvals from the Federal Railroad Administration (FRA); and the California Public Utilities Commission (CPUC). A courtesy copy shall be provided to the California Department of Transportation (Caltrans), District 8 Office. Within 30 days after the completion of each ~~road and~~ railroad crossing ~~improvements~~improvement, the project owner shall provide the CPM with a copy of written approvals from BNSF, FRA, and CPUC as to the adequacy and safety of the roads and bridge.

TRANS-6 SHOULD BE DELETED