4.8 TRANSPORTATION AND CIRCULATION

4.8.1 INTRODUCTION

This Transportation and Circulation section of the Draft SEIR describes the transportation system and conditions in the project area, and assesses the transportation and circulation effects of the proposed project. Information for the section has been drawn primarily from the Yolo County General Plan[1] and associated EIR,[2] the Cache Creek Area Plan (CCAP) Update FEIR,[3] the 1996 EIR[4], and the following project-specific documents:

- Traffic Operations Memorandum, David Manciati, Fehr & Peers, July 18, 2022
- Information Related to Vehicle Trips, electronic mail from Yasha Saber to Yolo County, December 6, 2021

Government agencies and the public were provided an opportunity to comment on the proposed project in response to the Notice of Preparation (NOP) that provided a preliminary summary of the proposed project. The following comments were submitted by the California Department of Transportation (Caltrans) District 3 in letters dated February 26, 2021, March 4, 2021, and March 29, 2021, and responses are included in *italics*. NOP comment letters are included in Appendix B of this Draft SEIR.

- Please provide the anticipated increase in truck trips (if any) from the site due to the proposed project.

  Please see subsection 4.8.4 below, which describes that there is no proposed change in facility operations or permitted annual maximum production levels. See also Impact 4.8-1, below.

- Please provide the trip distribution of the new trips for the proposed project.

  Given that the project does not propose production increases above current permitted levels or any modifications to the roadway system, trip distribution was not developed. Please see Impact 4.8-4 and Appendix K, Traffic Operations Memorandum.

- All work proposed and performed within the State's highway right of way must be in accordance with Caltrans' standards and require a Caltrans Encroachment Permit prior to beginning construction.

[1] Yolo County. 2030 Countywide General Plan. November 10, 2009.
[2] Yolo County. Yolo County 2030 Countywide General Plan Environmental Impact Report. SCH #2008102034. April 2009.
[3] Yolo County. Cache Creek Area Plan Update Project, Final Environmental Impact Report. SCH # 2017052069. December 2019.
[4] Yolo County, 1996, Final Environmental Impact Report for Solano Long-term Off-Channel Mining Permit Application SCH #96012034, (combined DEIR and Responses to Comments documents).

No modification to the existing roadway system is proposed by the project. Also, the applicant proposes to eliminate Phase 7 of the current approval which would avoid mining and associated impacts on the west side of I-505. This would avoid truck trips east from Phase 5 over I-505 to the plant and/or conveyance of aggregate under I-505.

The Madison Fire Protection District (District) provided NOP comments in correspondence dated February 26, 2021 (see Appendix B). The District raised the following point relevant to transportation and circulation (responses are noted in *italics*).

- There could be a possible impact on traffic with more vehicles in and out of the plant entrance on State Route (SR) 16.

  Potential traffic impacts are identified and evaluated in this section. Impacts are shown to be less than significant with the exception of VMT and LOS at the intersection of SR 16 and CR 96. The project will not result in an increase in the permitted annual capacity attributable to CEMEX, and thus may result in the same average VMT as has occurred under existing conditions. However, it is also feasible that CEMEX will maximize its production in any given year, which would result in a greater VMT as compared to existing average conditions. In order to fully analyze this potential impact and to advance CEQA's policy of being more protective of the environment, this Draft SEIR conservatively measures VMT over the proposed 20-year extended permit period assuming CEMEX will maximize its production, even though historical data show actual volumes being lower. See analysis of Impact 4.8-1.

  The analysis demonstrates that the intersection of SR 16 and CR 96 has an existing LOS deficiency that cannot be reasonably or feasibly resolved by the proposed project because the required reduction in trips to achieve the target LOS would likely exceed the proposed project's entire trip contribution during AM and PM peak hours. In other words, restricting all trip generation from the CEMEX site during the AM and PM peak hours would not produce acceptable peak hour operations at the subject intersection. See analysis of Impact 4.8-4

The following subsections describe the existing transportation and circulation setting of the study area (specifically in the lower Cache Creek area), the applicable regulatory framework, standards of significance used to determine potential environmental effects that may result from implementation of the project, potentially significant impacts associated with relevant substantial changes in the project and/or the circumstances under which the project will be undertaken and/or new information as defined by CEQA Guidelines Section 15162, and new or different feasible mitigation measures to reduce those impacts to a less-than-significant level, if applicable.

4.8.2 EXISTING ENVIRONMENTAL SETTING

The following setting information provides a brief summary of the conditions relevant to the project's potential impacts related to VMT and safety.

Description of Regional Environment

Regarding transportation resources, the regional environment has not changed significantly since the 1996 EIR. As noted in that document, the project site is in a rural environment characterized by agricultural uses including orchards, field crops, and open land. Residential development is limited in the area, with rural residences scattered throughout the region. The only significant urban uses within the study area (shown on Figure 3-1) are in the unincorporated communities of Madison and Capay. The City of Woodland is located approximately 8 miles east of the project site. Aggregate mining operations, inclusive of above-ground structures and equipment, are prevalent throughout the region, in particular, along the banks of Cache Creek, within the Cache Creek Area Plan (CCAP) boundaries.

The transportation system within the planning area continues to be almost entirely dependent on the roadway system for the movement of goods and people. The automobile is the primary travel mode for most trips. The majority of regional travel occurs on Interstate 5 (I-5), Interstate 505 (I-505) and State Route 16 (SR 16).

Regional access to the project area is provided by SR 16. SR 16 is an east-west highway that runs from SR 20 in Colusa County to SR 49, outside Plymouth in Amador County. SR 16 is part of the California Freeway and Expressway System. The portion of SR 16 that passes through Woodland runs from west of I-505 to County Road 98, at which point SR 16/County Road 98 runs north-south to I-5. SR 16 is a two-lane roadway with a speed limit of up to 55 miles per hour (mph) outside of developed areas. The nearest major highways to the project site are I-5 and I-505. Both are north-south highways with two lanes in each direction near SR 16. The County roads in the vicinity primarily service rural areas.

Description of Local Environment

Like the regional environment, there have been no significant changes to the local transportation system and status of local facilities, including travel on the roads, public transit, the bicycle/pedestrian system, and school buses.

Roadway System

The 1996 EIR provides a description of the following roads, all of which are still relevant to current conditions:

- **I-5** serves the eastern portion of the CCAP planning area and maintains interchange access at County Road 13, County Road 98, and several streets within the city of Woodland.

- **I-505** is a four-lane, north-south freeway that connects with Interstate 80 (I-80) near Vacaville and I-5 near Dunnigan. An interchange exists at SR 16 near the project site (see Figure 3-2).

- **SR 16** is a two-lane, east-west highway that traverses Amador, Sacramento, Yolo, and Colusa Counties. SR 16 begins at I-5 and intersects Main Street in Woodland 3 miles to the south. It then runs west for several miles through western Yolo County, eventually

turning in a northwesterly direction into western Colusa County. The project site is generally bordered by SR 16 along its southern boundary. Passing is permitted along portions of SR 16.

- **County Road 98** is a north-south road that forms the western boundary of the City of Woodland. County Road 98 begins at I-80 as Pedrick Road. It continues north through the western outskirts of Davis to Woodland where it forms the SR 16/County Road 98/W. Main Street intersection. For the purposes of this Draft SEIR, the concurrent 3-mile section of road north of this intersection, known both as SR 16 and County Road 98, is referred to as County Road 98.

Level of Service

Level of service (LOS) is a term used to qualitatively describe the operating conditions of a roadway based on factors such as speed, travel time, maneuverability, delay, and safety. The level of service of a facility is designated with a letter, A to F, with A representing the best operating conditions and F the worst.

The following intersections were selected by the County as relevant to the proposed project (these are the same locations analyzed for the project's 1996 EIR):

1. SR 16/I-505 Southbound Ramps
2. SR 16/I-505 Northbound Ramps
3. SR 16/CEMEX Driveway
4. SR 16/County Road 96
5. County Road 98/SR 16/W. Main Street
6. County Road 98/County Road 20/W. Kentucky Avenue

Based on the results of a traffic operations analysis,[5] each intersection operates at LOS C or better during the AM and PM peak hours, except for SR 16/County Road 96 (CR 96). The minor street (CR 96) approach to the intersection operates at LOS F. This indicates that drivers in busy months are waiting over 50 seconds before accessing SR 16.

Vehicle Miles Travelled

Total vehicle traffic associated with the existing CEMEX plant can be quantified in terms of vehicle miles travelled (VMT), which is a function of the amount of material produced and exported from the site. Under existing permits, CEMEX has a maximum permitted level of production equal to 1,200,000 tons mined per year and 1,000,000 tons sold; however actual annual excavation has varied from year to year and is generally lower than the maximum allowed. The Draft SEIR relies on the 10-year average annual production level in order to provide a more realistic representation of existing traffic conditions (given the use of actual data) and a more conservative (i.e., more protective of the environment) analysis. The existing VMT was evaluated using average annual production over the ten-year period between 2012 and 2021. During this period, CEMEX sold an average of 735,448 tons of aggregate material per year. The 10-year average is a conservative baseline because the 10-year average annual tonnage is lower than the maximum permitted

[5] Fehr and Peers, 2022. CEMEX SEIR – Traffic Operations Memorandum, July 18. (Appendix K)

annual extraction, lower than the actual annual production for the year the NOP was released, and reflects a period of economic recession. The selection of this lower figure as the baseline results in a higher estimate of the project's impact on VMT.

While an analysis of VMT from heavy truck trips is not required pursuant to SB 743 and the CEQA Guidelines, it is not precluded, and therefore, the County has included it in this analysis. The legislative intent of SB 743, and the associated CEQA Guidelines Section 15064.3, is to ensure that lead agencies include an equitable and appropriate analysis of VMT from infill, which explains the focus on passenger car and light truck trips related to land use projects. Consistent with the Governor's Office of Planning and Research (OPR) guidance, for urban infill development, it is defensible to exclude heavy truck trips based on this premise. However, for projects such as the subject aggregate mine, where the primary traffic issue concerns truck trips associated with hauling, it is the position of the County that truck trips should be analyzed in the EIR. Hence both VMT and truck haul trips generation are analyzed.

For the purposes of assessing mining land use projects, VMT is a two-part formula calculated by the following equation:

$$VMT = (Avg.trip\ length\ x\ Vehicle\ trips)_{Trucks} + (Avg.trip\ length\ x\ Vehicle\ trips)_{Employees}$$

CEMEX has historical records documenting customer sales at the subject plant site (Madison Cache Creek plant). Data from 2020 and 2021 was used to derive the average number of truck trips per year and the average truck trip length. In addition, CEMEX generates truck trips resulting from hauling recyclable material independent of aggregate resource trips. Using CEMEX recyclable material data (2012 to 2021), an estimate of annual recyclable material truck trips (independent of aggregate trips) was made. Between 2012 and 2021, CEMEX processed an average of 30,003 tons of recycled material per year.

CEMEX also provided information regarding employee residence locations, average number of employees working per day, and average number of work days per year. This data was used to derive employee vehicle trip generation and trip length.

Together, both employee and truck inputs were used to develop truck and employee VMT estimates under existing conditions. Table 4.8-1 shows that the existing conditions (ten-year average) VMT is 2,395,346 vehicle miles travelled per year.

Table 4.8-1: Existing Conditions Annual VMT (10-Year Average) at CEMEX Plant

Metric	Existing Conditions (10-Year Average)
Annual Sales	735,448 tons
Employee Avg. Trip Length (Round Trip)	89.5
Truck Avg. Trip Length (Round Trip)	62.4
Employee Annual VMT	428,439
Truck Annual VMT[a]	1,966,907
Total Annual VMT	**2,395,346**

Source: Fehr & Peers, 2022. Truck capacity source: Saber, Y., December 6, 2021

[a] Truck Annual VMT includes both aggregate material sold and hauled off-site by truck (24.4 tons per truck) and an estimate of recyclable material truck trips (independent of aggregate trips), assuming an average truck load of 22 tons

Safety

Pavement Condition

The CEMEX haul route connects directly from a private road to SR 16 and does not use any County roads in its operation. Since SR 16 is part of the California State Highway System (SHS), Caltrans is the responsible agency for pavement management.

Based on the most recent results (2019) generated by PaveM, Caltrans' pavement management tool, all individual segments of SR 16 from I-505 to I-5 have either "good" or "fair" pavement condition, per Caltrans' interpretation of the federal *Moving Ahead for Progress in the 21st Century Act* (MAP-21) rules for categorizing pavement condition based on ride, rutting/faulting, and cracking. Under Caltrans' interpretation of the MAP-21 rules, roadway segments rated "fair" have two of the three criteria (i.e., ride, rutting/faulting, and cracking) rated at least "fair". If most criteria (i.e., at least two of three) are rated "poor", then the pavement condition is interpreted to be "poor". Most SR 16 segments between I-505 and County Road 93 are rated as "good", while all segments between County Road 93 and I-5 are rated as "fair".

Relevant to safety, a review of aerial imagery shows that striping has faded at the SR 16/CEMEX driveway intersection, including the driveway stop lines, "STOP" markings, and centerline. Section 3A.04 of the *California Manual on Uniform Traffic Control Devices* (CA MUTCD) states that the "materials used for markings should provide the specified color throughout their useful life." It is the responsibility of Yolo County and Caltrans to evaluate whether or not current conditions are acceptable.

Design Standards & Collisions

The CEMEX site has direct access to SR 16 from a private road and no other haul routes are used by the project site to access the SHS. Therefore, the project does not directly contribute to traffic on County-owned roadways. As to the SHS, Caltrans is the responsible agency for safety and approaches safety through three primary elements – design standard compliance, collision history, and collision risk. The agency develops its transportation network consistent with applicable design standards and has standardized traffic safety investigations to address safety concerns. Under guidance in the new *Interim Local Development and Intergovernmental Review (LIDGR) Safety Practitioners Guidance* (Caltrans, 2020), Caltrans is responsible for providing lead agencies with a safety analysis of the State Highway System in the project vicinity for use in CEQA environmental documents. As noted earlier, Caltrans submitted comments during the NOP comment period related to truck traffic and trip distribution. No comments were received regarding safety issues of the SHS.

4.8.3 REGULATORY CONTEXT

Since the 1996 EIR was certified, some applicable laws and regulations have continued to evolve. The following is a description of the current federal, State, and local environmental laws and policies that are relevant to the review of transportation impacts for CEQA compliance.

Federal Regulations

No federal plans, policies, regulations, or laws related to transportation and circulation apply to the analysis of potential project transportation impacts.

State Regulations

Senate Bill 743

SB 743 (Stats. 2013, ch. 386) requires the Governor's Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metric beyond TPAs. In the amended CEQA Guidelines, OPR selected automobile VMT as the preferred transportation impact metric and applied their discretion to recommend its use statewide. Determination of impacts based on VMT is required statewide as of July 1, 2020.

SB 743 also added Section 21099 to the Public Resources Code, which states that automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment upon certification of the CEQA Guidelines by the California Natural Resources Agency. Since the amended CEQA Guidelines were certified in December 2018, LOS or similar measures of vehicular capacity or traffic congestion are not considered a significant impact on the environment.

CEQA Guidelines Section 15064.3

Section 15064.3 of the CEQA Guidelines was added in 2018 to address the requirements of SB 743 and OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA. Section 15064.3 states the following:

> (a) Purpose.
>
> This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.
>
> (b) Criteria for Analyzing Transportation Impacts.
>
> (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less-than-significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less-than-significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

(c) Applicability.

The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.

California Department of Transportation (Caltrans)

The California Department of Transportation (Caltrans) is responsible for planning, designing, constructing, operating, and maintaining all State-owned roadways in Yolo County. Federal highway standards are implemented in California by Caltrans. Any improvements or modifications to the State Highway System within the County need to be approved by Caltrans. As part of its responsibilities, Caltrans reviews local development projects subject to CEQA to assess potential impacts to the State Highway System based on the following technical guidance.

- Vehicle Miles Traveled-Focused Transportation Impact Study Guide, Caltrans, May 20, 2020. (Referred to as the VMT TISG in the remainder of the document.)

- Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance, Caltrans, December 18, 2020 (Referred to as the Caltrans Safety Impact Guidance in the remainder of the document).

VMT TISG

The VMT TISG outlines how Caltrans will review land use projects with a focus on supporting state land use goals, state planning priorities, and GHG emission reduction goals. The VMT TISG endorses OPR's Technical Advisory as the basis for transportation impact analysis methodology and thresholds including the use of screening to streamline qualified projects because they help achieve the state's VMT reduction and mode shift goals.

Caltrans Safety Impact Guidance

The Caltrans Safety Impact Guidance provides technical instructions on how to evaluate potential safety impacts to the State Highway System. This guidance largely focuses on the actions of Caltrans district staff in performing the analysis and providing relevant impact information to lead agencies. The interim guidance recommends that safety analyses include a review of three primary elements related to transportation safety – design standard compliance, collision history, and collision risk (consistent with the Federal Highway Administration's Systemic Approach to Safety). The interim guidance does not establish specific analysis methods or significance thresholds for determining safety impacts under CEQA. Additionally, Caltrans notes that local agencies may use the interim guidance at their own discretion as a guide for review of local facilities.

Local Regulations

Sacramento Area Council of Governments (SACOG)

SACOG is the Metropolitan Planning Organization (MPO) governing the six-county Sacramento region consisting of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties and their 22 cities. SACOG is responsible for the regional transportation plan (RTP) and Sustainable Communities Strategy (SCS). The current SACOG RTP/SCS is entitled 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (2019).

The SACOG 2020 MTP/SCS provides the basis for air quality conformity findings related to the national Clean Air Act and determinations of whether the region is complying with GHG reduction targets for automobiles and light trucks established under SB 375. Major projects that are inconsistent with the plan could jeopardize the plan's effectiveness for air pollution and GHG reduction. Consequently, consistency with the MTP/SCS is a potential basis for determining adverse impacts related to these environmental topics.

The 2020 MTP/SCS contains a project list, which identifies near- and long-term transportation programs, infrastructure investments, and improvements in the SACOG region. The project list currently includes the following two projects in the study area:

- SR 16 Pavement Rehabilitation C – In Yolo County on SR 16 from CR 98 to I-5 Junction (PM R40.5/R43.42; SHOPP ID 20445)

- SR 16 Safety Improvement Project – Shoulder widening, curve correction, left-turn channelization, signalization, and two-way left-turn lanes from 0.4 mile west of CR 79 to 0.4 mile east of CR 79 and from Esparto to 0.2 mile west of I-505, (PM 20.5/31.6)

2030 Countywide General Plan

The 2030 Countywide General Plan contains the following goals, policies, and actions relevant to the proposed project:

Goal CI-3: Service Thresholds. Balance the preservation of community and rural values with a safe and efficient circulation system.

Policy CI-3.1: Maintain Level of Service (LOS) C or better for roadways and intersections in the unincorporated county. In no case shall land use be approved that would either result in worse than LOS C conditions, or require additional improvements to maintain the required level of service, except as specified below. The intent of this policy is to consider level of service as a limit on the capacity of the County's roadways. (Only those segments relative the project site are shown)

E. State Route 16 (County Road 78 to County Road 85B) – LOS D is acceptable.

F. State Route 16 (County Road 85B to County Road 21A) – LOS E is acceptable.

G. State Route 16 (County Road 21A to Interstate 505) – LOS D is acceptable, assuming that this segment is widened to four lanes with intersection improvements appropriate for an arterial roadway. The County will secure a fair share towards these improvements from planned development. Caltrans and the Rumsey Band of Wintun Indians shall be encouraged to provide funding for the project.

H. State Route 16 (Interstate 505 to County Road 98) – LOS D is acceptable, assuming that passing lanes and appropriate intersection improvements are constructed. The County will secure a fair share towards these improvements from all feasible sources. Caltrans and the Rumsey Band of Wintun Indians shall be encouraged to establish a funding mechanism to pay the remainder.

X. Additional exceptions to this policy may be allowed by the Board of Supervisors on a case-by-case basis, where reducing the level of service would result in a clear public benefit. Such circumstances may include, but are not limited to, the following:

1. Preserving agriculture or open space land;
2. Enhancing the agricultural economy;
3. Preserving scenic roadways/highways;
4. Preserving the rural character of the county;
5. Avoiding adverse impacts to alternative transportation modes;
6. Avoiding growth inducement; or

7. Preserving downtown community environments.

8. Where right-of-way constraints would make the improvements infeasible.

Policy CI-3.3: CEQA review for subsequent projects will analyze project traffic and circulation impacts using both the Yolo County General Plan policies and Caltrans policies (based on the CSMPs, TCCRs, or other guidelines) as applicable.

A. Consider the following objectives, following consultation with Caltrans, when making decisions to expand or modify the State highway system in Yolo County:

1. Minimize impacts to the environment.

2. Minimize increases in greenhouse gases and air pollutants.

3. Minimize increases in VMT.

4. Minimize long-distance commute trips.

5. Fully utilize existing capacity while maintaining stable flows and speeds.

6. Provide facilities for all users including pedestrians, bicyclists, carpool users and transit riders.

B. Consider the following objectives when making decisions to expand the County road system in Yolo County:

1. Minimize impacts to the environment.

2. Promote designs that result in a decrease of greenhouse gases and air pollutants.

3. Promote designs that decrease Vehicle Miles Traveled (VMT) and long-distance commute trips.

4. Fully utilize existing capacity in accordance with adopted Levels of Service.

5. Provide facilities for all users including pedestrians, bicyclists, carpool users and transit riders, where appropriate.

Policy CI-3.4: Define level of service consistent with the latest edition of the Highway Capacity Manual and calculate using the methodologies contained in that manual. At a minimum, weekday AM and PM peak hour traffic volumes will be used in determining compliance with the level of service standard. For recreational and other non-typical peak hour uses, weekday afternoon, weekday late evening, or weekends shall be considered.

Policy CI-3.7: Consider designs for planned roadway capacity improvements that recognize the unique conditions associated with rural and agricultural

areas in accordance with established standards including, but not limited to, the following:

- American Association of State Highway and Transportation Officials (AASHTO) publication "A Policy on Geometric Design of Highways and Streets;"
- Caltrans' Main Streets: Flexibility in Design and Operations;
- Federal Highway Administration's Flexibility in Highway Design;
- 2007 California Fire Code; and
- Institute of Transportation Engineers' Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities.

Policy CI-3.9: To the greatest feasible extent, require new development to construct safety improvements consistent with current design standards on existing roadways that are anticipated to accommodate additional traffic from planned development.

Policy CI-3.10: Upgrade the existing County road system to be consistent with current County design standards (such as horizontal curvature, site distance, etc.) as transportation funding allows. Roadways that require design improvements to accommodate projected future traffic, as identified in Table CI-1, shall have the highest priority to be upgraded. Safety shall be a key factor in prioritizing specific projects.

These roadways also represent targeted trucking corridors for agricultural ("farm-to-market") transport and other goods movement. By attracting truck trips to these corridors, other roadways throughout the County are more available for movement of agricultural equipment and farm workers thus supporting more efficient and safe agricultural operations countywide.

Exceptions to design standards may be allowed where circumstances warrant special treatment of the roadway including, but not limited to, the following:

A. Extraordinary construction costs due to terrain, roadside development, or unusual right-of-way needs.

B. Environmental constraints that may otherwise preclude road improvement to the adopted standards.

C. Exceptions to the level of service policy specified in Policy CI-3.1.

Policy CI-3.11: Require new development to finance and construct all off-site circulation improvements necessary to mitigate a project's transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts, and impacts to the State Highway System). For

mitigation to be considered feasible, it must be consistent with the policies of the General Plan.

Policy CI-3.12: Collect the fair share cost of all feasible transportation improvements necessary to reduce the severity of cumulative transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts).

Policy CI-3.13: Ensure that transportation and circulation improvements (including improvements to comply with County design standards) are constructed and operational prior to or concurrent with the need, to the extent feasible.

Policy CI-3.16: Ensure that funding for the long-term maintenance of affected roads is provided by planned development.

Policy CI-3.18: Ensure adequate access for emergency vehicles.

Policy CI-7.2: Encourage movement of goods by truck on freeways and other appropriate designated routes.

Action CI-A9: Continue to implement and enforce design standards for industrial and highway commercial roadways to accommodate heavier loads associated with truck operations and larger turning radii to facilitate truck movements. (Policy CI-7.2) Responsibility: Planning and Public Works Department Timeframe: 2010/2011; Ongoing

Action CI-A16: Require new development to enter into an agreement with the County that establishes circulation improvements to be constructed and/or fair share costs to be the responsibility of the project applicant. (Policy CI-3.10, Policy CI-3.12, Policy CI-3.14) Responsibility: Planning and Public Works Department Timeframe: Ongoing

Off-Channel Mining Plan

The following goal and action from the adopted Yolo County Off-Channel Mining Plan (OCMP) related to transportation and circulation are applicable to the proposed project:

Goal 2.2-3: Prevent or minimize the adverse environmental effects of surface mining.

Action 2.4-21: Ensure that each mining operation adheres to approved haul routes and approved ingress/egress locations. Ensure through conditions of approval and other appropriate mechanisms that mining operations are funding their fair share of roadway and related impacts, including both one-time improvements and ongoing operations and maintenance, along approved haul routes and in proximity to approved operation ingress/egress locations.

Transportation Impact Study Guidelines

The County's Transportation Impact Study Guidelines document establishes protocol for transportation impact studies and reports based on the current state-of-the-practice in transportation planning and engineering. The following types of projects, which involve development activity in and around Yolo County and affect the County's transportation system, may require a Transportation Impact Study per the Guidelines:

- Transportation infrastructure modification or expansion, including CIP projects on County roads and state highways.
- Land use entitlements requiring discretionary approval by Yolo County, including annexations, general plan amendments, specific plans, zoning changes, conditional use permits, and tentative maps.
- Land use activity advanced by agencies other than Yolo County that is subject to jurisdictional review under State and federal law.
- Land use activity advanced by agencies other than Yolo County that is inconsistent with the County's General Plan.

Off-Channel Surface Mining Ordinance

Title 10, Chapter 4 of the Yolo County Code contains the Off-Channel Surface Mining Ordinance (Mining Ordinance), which provides the following requirements relevant to transportation and circulation:

Section 10-4.402. Access Roads.

> The first one-hundred (100) feet of access road intersecting a County-maintained road shall be surfaced in a manner approved by the Public Works Department, with an approach constructed to County standards. Traffic control and warning signs shall be installed as required by the Public Works Department.

Section 10-4.408. County Road Improvements.

> It is the intent of this program that each operator shall pay for any road improvements determined to be necessary to support their operation consistent with County and CCAP standards, and for ongoing operations and maintenance. Each operator shall pay its fair share toward improvements required to maintain a structural capacity (traffic index) sufficient for the project traffic and to maintain operations on County roads and on State Highways within the OCMP planning area consistent with applicable General Plan policies related to LOS and applicable State policy related to VMT. Fair share mitigation shall also be required to improve existing operational as well as structural deficiencies of the transportation system. Specific locations shall be identified through the project-specific environmental review process for each operator's long term mining permit application. Each operator shall participate in a funding program operated by the

County which is designed to ensure that all improvements are made in a timely manner and that a reimbursement mechanism is in place to ensure repayment of any costs contributed in excess of fair share amounts. The program shall be initiated upon the approval of the long term mining permits and shall be updated biennially by the County to ensure any new or modified impacts or funding sources are being addressed.

Each operator shall have the option to complete the work at their expense without triggering the competitive bid process, as long as they comply with the applicable legal requirements of the County. If the operator declines the option, the County shall utilize the competitive bid process.

Section 10-4.409. County Road Maintenance.

The operator shall agree to assume joint pavement maintenance responsibility with the County (or shared with another producer using the same roadway) for all County roads along a designated haul route from the access point of the surface mining operation to an appropriate State Highway. The County will provide maintenance of the county-maintained roadside drainage ditches, traffic signs, and striping. By May 15 of each year, the operator shall submit to the County an annual evaluation report documenting the structural integrity of the pavement structural section and the PCI of the roads maintained by the operator. The annual report shall be signed and sealed by a civil engineer licensed in the State of California. The report shall contain a proposed action plan for pavement maintenance and pavement improvements to maintain safe and efficient traffic operation on the roads, and a PCI of 70 or more, unless otherwise agreed by the County, as defined by American Society for Testing and Materials (ASTM) Method D6433 (Standard Practice for Roads and Parking Lots Pavement Condition Index Survey), for each upcoming year. Within 30 days, the County will review the report and recommend revisions if necessary. Following acceptance of the report by the County, the operator shall secure a County encroachment permit specific to the action plan (at no cost to the operator) and complete the proposed pavement maintenance and improvement activities prior to the submittal of the annual report. Striping may be provided by the County if County striping equipment and material are available. Otherwise striping will be provided by the operator. Once the work is completed, the operator will resubmit the annual evaluation report by November 1 each year, and include the scope and dates that work was completed.

If minor emergency asphalt repairs (work requiring a single County Public Works maintenance pick-up truck with asphalt patching material) are identified within the maintenance areas of the hauling routes after the Applicant’s yearly maintenance has been completed, county crews will perform the minor asphalt repair maintenance once in a sixty (60) consecutive day period. The types of asphalt pavement failures requiring repairs include, but are not limited to, cracking, pot holes, depressions, rutting, shoving, upheaval, and raveling and any other pavement damage or failures requiring immediate repair by the county.

If major emergency roadway repairs associated with the permitted activities (work requiring more than a single County Public Works maintenance pick-up truck with asphalt patching material, or minor asphalt repairs occurring in less than the sixty (60) consecutive day period) are identified after the Applicant's yearly maintenance has been completed, the Applicant shall obtain a County encroachment permit (at no cost to Applicant) and complete the major roadway repairs. If major roadway repairs that are the Applicant's fair share obligation are not completed by the Applicant in a timely manner as determined by the County, and the County must make repairs when the public's safety is considered at risk by the County Engineer, then the Applicant will be billed for the County's major roadway repair work on a time and materials basis. An applicant may coordinate with the County to have the County complete required improvements, and in such case, must fully fund the County's costs to do so. The operator does not assume the liability for the roadway, except for cases where the operator has not fulfilled its maintenance obligations.

If a subsequent mining operation utilizes a road previously required to be improved pursuant to this subsection, then the subsequent operator shall be responsible for compliance with the agreements and requirements of the previous operator.

4.8.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the project's potential impacts related to transportation and circulation. A discussion of the project's impacts, as well as mitigation measures where necessary, are also presented.

Standards of Significance

The significance criteria used for this analysis were developed from Appendix G of the CEQA Guidelines, and applicable policies and regulations of Yolo County. The transportation impact is considered significant if the proposed project would:

Cause an increase in baseline total VMT.

Cause an inconsistency with applicable design standards.

Cause a substantial decrease in safety.

Cause a significant environmental impact due to a conflict with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating transportation impacts.

The standards of significance presented in the 1996 EIR are listed below. For each standard, there is an explanation (*in italics*) describing how the standard from the 1996 EIR is addressed by the updated standards above. The 1996 EIR considered that the project would have a significant effect on transportation resources if it would:

- Change the level of service of a County roadway segment or intersection from acceptable levels (i.e., LOS A, B, or C) to unacceptable levels (i.e., LOS D, E, or F), as specified by Circulation Policy CIR-7 (now CI-3.1) of the Yolo County General Plan.

  Level of service (LOS) is a general measure of traffic operating conditions whereby a letter grade, from A to F, is assigned. The grades represent the perspective of drivers and are an indication of the comfort and convenience associated with the driving experience, as well as speed, travel time, traffic interruptions, and freedom to maneuver a typical vehicle. However, LOS does not fully describe environmental effects associated with fuel consumption, emissions, and public health.

  Previously, many lead agencies used LOS to assess the significance of transportation impacts pursuant to CEQA. As a result of SB 743, local jurisdictions no longer rely on vehicle level of service (LOS) and similar measures related to delay as the basis for determining the significance of transportation impacts under CEQA. However, because the County considers LOS as a matter of General Plan policy (Policy CI-3.1) existing LOS remains relevant to project consideration. This Draft SEIR does not utilize LOS for determination of transportation or circulation impact significance, but does consider LOS as a component of General Plan consistency related to County General Plan Policy CI-3.1, which establishes LOS thresholds on certain County roads. See Impact 4.8-4.

- Change the level of service on a State highway from acceptable levels (i.e., LOS A, B, C, or D) to unacceptable levels (i.e., LOS E or F) as specified by the Route Concept and Development Report for State Route 16 (Caltrans, 1987).

  See note above.

- Exacerbate conditions on a road or an intersection that currently operates at an unacceptable level of service.

  See note above.

- Add substantial (ten or more vehicle trips per day) to a road that does not currently meet the standards identified below:

  - Nonstandard road design according to County and State design standards;
  - Bridges less than 20 feet in width or those identified by the Federal or State government as being in need of structural repair;
  - Locations in which four or more reported accidents have occurred in a 12-month period during the past three years;
  - Pavement that has deteriorated to the degree that it may affect public health and safety; or

- Intersections in which limited curve radii cause a truck to access an on-coming lane while making a turning movement.

Impacts associated with design standard compliance for safety purposes are addressed by criterion "b" above.

- Add substantial (50 or more) loaded truck trips per day to a County-maintained roadway in which the pavement will deteriorate and require repair during the life of the permit.

  Impacts associated with pavement condition for safety purposes are addressed by criterion "c" above.

- Disrupt or interfere with existing or planned transit operations and facilities of the Yolo County Transit Authority.

  No change.

- Create hazards for pedestrians or bicyclists.

  No change.

- Disrupt or interfere with existing or planned bicycle facilities as identified in the County of Yolo Bikeway Plan.

  No change.

- Disrupt or interfere with existing or planned school bus operations of the Woodland Joint Unified and Esparto Unified School Districts.

  No change.

Impacts Identified in the 1996 EIR

The impacts and mitigation measures adopted in the certified 1996 EIR are summarized in Table 4.8-2. The table provides a discussion of the status of each mitigation measure.

Table 4.8-2: 1996 EIR Impact Statements, Mitigation Measures and Discussion

Impact No.	Impact Statement from 1996 EIR	Mitigation Measures/Discussion
4.8-1	The proposed project would result in additional truck traffic on the nonstandard segment of SR 16 between I-505 and the entrance to the Solano Concrete Plant. This is considered to be a significant impact.	Mitigation Measure 4.8-1a/Condition of Approval No. 66[a] requires: "By July 1, 1999, the operator shall construct a left-turn lane for eastbound movements on State Route 16 into the processing plant. The operator shall be responsible for 100 percent of the costs of the improvement. Encroachment Permits from Caltrans will be obtained prior to construction." The left turn lane was completed in 1999. The mitigation measure has been met and the condition is implemented and fully discharged.
4.8-2	The proposed project would exacerbate unacceptable operations at the SR 16/County Road 98/Main Street intersection in the City of Woodland. This is considered to be a significant impact.	Mitigation Measure 4.8-2a/Condition of Approval No. 67[a] requires: "The operator shall pay a fair share toward the construction of left-turn lanes on each approach, and the installation of a traffic signal, at the SR 16/County Road 98/Main Street intersection to maintain acceptable levels of service. Prior to the commencement of mining, the operator shall pay $1,200 to the City of Woodland Public Works Department, to be used in the construction of turn lanes and a traffic signal at the intersection of State Route 16 and County Road 98. This amount has been determined to be the operator's fair share portion of the cost of improvements at the intersection and will fully mitigate the potential traffic impacts at this location." The operator fulfilled this obligation with a payment to the City of Woodland in September 1997. This mitigation measure has been met and the condition is implemented and fully discharged.

Source: Baseline Environmental Consulting, 2021.
Note:
[a] County of Yolo, 2021. Conditions of Approval Mining Permit and Reclamation Plan No. ZF #95-093 CEMEX Mining and Reclamation Project. 2020 Ten-Year Permit Review. As modified through February 11, 2021.

Impacts and Mitigation Measures for the Proposed Project

The discussion below examines relevant substantial changes in the project, substantial changes in the circumstances under which the project will be undertaken, and/or new information of substantial importance, as defined by CEQA Guidelines Section 15162. As necessary, this document updates or expands upon impact discussions in the 1996 EIR to evaluate changes associated with the proposed project and describes whether new or revised mitigation is required.

Pursuant to Section 15162 of the CEQA Guidelines, a subsequent EIR is required where proposed changes in the project or changes in the circumstances of the project would require revisions of the previous EIR due to new significant environmental effects or a substantial

increase in the severity of previously identified effects. Additionally, a subsequent EIR is required where there is new information that identifies significant effects not previously discussed, significant effects examined in the prior EIR that will be substantially more severe than previously shown, or mitigation measures or alternatives that are now feasible after previously being found infeasible, or are considerably different from those previously analyzed, that would substantially reduce significant effects but the applicant declines to adopt. Each impact is analyzed to determine whether any of the requirements for a subsequent EIR are met and, if so, additional environmental analysis is provided to evaluate the impacts, mitigation measures, and alternatives, as appropriate.

Impact 4.8-1: Cause an increase in baseline total VMT. The impact would be *significant.*

Under existing conditions, VMT at the CEMEX site is estimated to be 2,395,346 vehicle-miles per year (see Table 4.8-3). This estimate is based on a ten-year (2012-2021) annual average of 735,448 tons sold at the project site.

Table 4.8-3: Annual VMT at CEMEX Plant

Metric	10-Year (2012-2021) Production Rate	Permitted
Annual Sales	735,448 tons	1,000,000
Employee Avg. Trip Length (Round Trip)	89.5	89.5
Truck Avg. Trip Length (Round Trip)	62.4	62.4
Employee Annual VMT	428,439	428,439
Truck Annual VMT[a]	1,966,907	2,674,434
Total Annual VMT	**2,395,346**	**3,102,873**

Source: Fehr & Peers, 2022.
Note:
[a] Truck Annual VMT includes both aggregate production tons sold and an estimate of recyclable material truck trips (independent of aggregate trips), which are assumed to increase or decrease commensurate with annual aggregate production rate.

The project will not result in an increase in the permitted annual capacity attributable to CEMEX, and thus may result in the same average VMT as has occurred under existing conditions. However, it is also feasible that CEMEX will maximize its production in any given year, which would result in a greater VMT as compared to existing average conditions. In order to fully analyze this potential impact and to advance CEQA's policy of being more protective of the environment, this Draft SEIR conservatively measures VMT over the proposed 20-year extended permit period assuming CEMEX will maximize its production, even though historical data show actual volumes being lower.

At the maximum permitted level, total annual 3,102,873 VMT as compared to 2,395,346 reflective of average conditions over the last ten years, and this higher level is assumed to occur during the requested 20-year extended permit period. This potential increase of 707,527 annual VMT is attributable to the increase in aggregate truck trips that would occur if production were maximized, as well as an assumed commensurate increase in independent recyclable material truck trips.

It is possible that VMT could be higher or lower after 2027 *without* the project. Market demand for mining would not be directly affected if the proposed project did not proceed, but, without the

project, local supply could be reduced. However, other producers along Cache Creek have available capacity and may successfully supply unmet demand though it is likely that regional VMT would be greater without permit approval as trip lengths for gravel deliveries increase. On this topic, the CCAP Update DEIR states that "[minimization] of aggregate truck trips is a fundamental consideration in implementation of the CCAP. By ensuring a local source of aggregate, Yolo has maximized the opportunity to reduce mining truck traffic in the County… In support of state policy, and the recommendations of the OPR Technical Advisory, the CCAP ensures a local source of aggregate for local construction projects that would otherwise be transported from greater distances, and thereby reduces the distance trucks must travel to deliver product to regional sites… Overall the CCAP provides a 'travel efficient' program for aggregate resources serving the region while recognizing that unlike most urban land uses which fundamentally can be located anywhere, resource-based land uses are limited to locations where the resource exists."

Conclusion

There are no proposed changes in the project that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

There are no changes in the circumstances under which the project would be undertaken that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

As presented above, there is new information related to regulation and management of VMT that was not previously known at the time of the 1996 EIR that will result in a new significant impact. Specifically, the proposed project could result in VMT greater than the baseline (ten-year average) VMT by 707,527 per year.

Mitigation Measure 4.8-1

Implement Mitigation Measure 4.2-5.

Significance After Mitigation:

Notwithstanding implementation of this measure, the project could result in a net increase in VMT, and therefore this impact is considered significant and unavoidable.

Mitigation measures that would reduce VMT must result in one of two outcomes – a decrease in average trip length or a decrease in trip generation. The proposed project's remote location, specialized land use type, and relatively small number of employees would limit the range and effectiveness of potential VMT mitigation options, particularly those that are commonly applicable in urban or suburban settings (e.g., co-locating complementary land uses, providing subsidized transit passes, improving pedestrian/bicycle networks, managing parking supply, establishing ride sharing, or other mechanisms to reduce employee commute, etc.). However, one of the primary concerns associated with increased VMT is the resulting increase in GHG emissions. Mitigation Measure 4.2-5 is intended to mitigate for the increase in GHG emissions associated with the

project. Nonetheless, other impacts associated with increased VMTs could not be feasibly mitigated, meaning that this impact is considered significant and unavoidable.

Impact 4.8-2: Cause an inconsistency with applicable design standards. The impact would be *less than significant*.

While the project would increase the permit length by 20 years, the project is not proposing modifications to the existing transportation network. Consistent with Mining Ordinance sections 10-4.408 and 10-4.409, the operator (CEMEX) will be required to continue to pay its fair share toward road improvements required to maintain a structural capacity (traffic index) sufficient for the project traffic and to maintain operations on County roads and on State Highways within the OCMP planning area and continue to assume joint pavement maintenance responsibility with the County (or shared with another producer using the same roadway) for all County roads along a designated haul route from the access point of the surface mining operation to an appropriate State Highway. Therefore, the project changes would not cause an inconsistency with applicable design standards.

Conclusion

There are no proposed changes in the project that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

There are no changes in the circumstances under which the project would be undertaken that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

There is no new important information relevant to this area of impact that was not previously known at the time of the 1996 EIR. There are no related new significant impacts, more substantial increase in the severity of previously identified significant impacts, previously dismissed mitigation that is now feasible, previously dismissed alternatives that are now feasible, or different more effective alternatives that have emerged or become known.

Mitigation Measure(s)

None required.

Impact 4.8-3: Cause a substantial decrease in safety. The impact would be *less than significant.*

The CEMEX site has direct access to SR 16 from a private road and no other haul routes are used by the project site to access the SHS. Caltrans is the owner and operator of the transportation network used by the CEMEX site (i.e., SR 16, I-505, and I-5), and the proposed project would continue to use its assigned haul route on the SHS. Regarding the SHS, Caltrans is the responsible agency for pavement management and safety. Caltrans monitors pavement performance and estimates future condition of all pavements in the State highway system. It also assists districts with planning, prioritizing, and programming pavement projects in SHOPP and

Highway Maintenance programs. Additionally, Caltrans has standardized traffic safety investigations to address safety concerns.

While the current pavement in the SR 16 corridor is rated as fair or good, Caltrans has anticipated future pavement improvements. According to the *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy* (2020 MTP/SCS) (SACOG, 2019), existing pavement on a portion of the highway will be rehabilitated within the 20-year planning horizon of the plan.

- SR 16 Pavement Rehabilitation C – In Yolo County on SR 16 from CR 98 to I-5 Junction (PM R40.5/R43.42; SHOPP ID 20445)

The project is not proposing modifications to the existing transportation network, alter the approved haul route, change the vehicle mix, or contribute traffic above currently permitted levels. Pavement condition and safety issues on SR 16 would continue to be monitored and addressed by Caltrans, with or without approval of the proposed project. Therefore, the potential incremental effect of the proposed project during the 20-year permit extension would be addressed through current processes.

Conclusion

There are no proposed changes in the project that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

There are no changes in the circumstances under which the project would be undertaken that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR are required related to this area of impact.

There is no new important information relevant to this area of impact that was not previously known at the time of the 1996 EIR. There are no related new significant impacts, more substantial increase in the severity of previously identified significant impacts, previously dismissed mitigation that is now feasible, previously dismissed alternatives that are now feasible, or different more effective alternatives that have emerged or become known.

Mitigation Measure(s)

None required.

Impact 4.8-4: Cause a significant environmental impact due to a conflict with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating transportation impacts. This impact would be *significant*.

Table 4.8-4 below provides an analysis of the proposed project's consistency with applicable policies and regulations that have been adopted for the purpose of avoiding or mitigating environmental effects related to transportation and circulation.

In general, the project proposes to continue mining and reclamation activities, plant operation, and post-reclamation activities as described and evaluated in the 1996 EIR for an additional 20 years. The 1996 EIR calculated levels of service for the roadways in the project area under pre-project existing conditions and with the proposed project. The 1996 EIR concluded that operations on SR 16 would continue to be LOS C and all County roads would continue to operate at LOS A with the project.

A traffic operations analysis was conducted to support the evaluation of the proposed project's effect on local traffic conditions and consistency with County policies regarding LOS.[6] The following intersections were evaluated (these are the same locations analyzed for the project's 1996 EIR):

1. SR 16/I-505 Southbound Ramps
2. SR 16/I-505 Northbound Ramps
3. SR 16/CEMEX Driveway
4. SR 16/County Road 96
5. County Road 98/SR 16/W. Main Street
6. County Road 98/County Road 20/W. Kentucky Avenue

Based on the results of a traffic operations analysis, each intersection operates at LOS C or better during the AM and PM peak hours, except for SR 16/County Road 96 (CR 96). The minor street (CR 96) approach to the intersection operates at LOS F (during the busy months). This indicates that drivers in busy months are waiting over 50 seconds before accessing SR 16.

The following LOS discussion is provided to address Policy CI-3.1 of the County General Plan related to LOS. Appendix K provides a Traffic Operations Memorandum prepared for the proposed project. The analysis demonstrates that the intersection of SR 16 and CR 96 has an existing LOS deficiency that cannot be reasonably or feasibly resolved by the proposed project because the required reduction in trips to achieve the target LOS would likely exceed the proposed project's entire trip contribution during AM and PM peak hours. In other words, restricting all trip generation from the CEMEX site during the AM and PM peak hours would not produce acceptable peak hour operations at the subject intersection. SR 16 is a State facility and there are no planned capacity improvements for that facility. All other intersections potentially affected by project traffic are operating at acceptable LOS and project trip contributions will not adversely affect operations.

General Plan Policy CI-3.1(X) allows exceptions to the target LOS identified for various roadway segments based on a case-by-case determination by the Board of Supervisors as noted below:

X. Additional exceptions to this policy may be allowed by the Board of Supervisors on a case-by-case basis, where reducing the level of service would result in a clear public benefit. Such circumstances may include, but are not limited to, the following:

1. Preserving agriculture or open space land;
2. Enhancing the agricultural economy;

[6] Fehr and Peers, 2022. CEMEX SEIR – Traffic Operations Memorandum, July 18. (Appendix K)

3. Preserving scenic roadways/highways;
4. Preserving the rural character of the county;
5. Avoiding adverse impacts to alternative transportation modes;
6. Avoiding growth inducement;
7. Preserving downtown community environments; or
8. Where right-of-way constraints would make the improvements infeasible.

Where exceptions are applicable, there would, by definition, be no significant impact. The CCAP ensures a local source of aggregate for local needs that would otherwise be transported from greater distances and thereby reduces the distance trucks must travel to meet local and regional needs. In this respect, implementation of the CCAP is beneficial to regional VMT. In addition, exceptions 1, 2, 3-6, and 8 are all applicable to the subject circumstances. Mining is an allowed use in the Agriculture land use designation and zone district, mining is a documented beneficial contributor to the economy, implementation of the CCAP precludes other adverse impacts from occurring by ensuring a local source of aggregate, the project is not growth inducing, and there is no reserved right-of-way for any planned capital improvements for this segment of SR 16.

Conclusion

There are no proposed changes in the project that would result in new significant impacts or substantial increase in the severity of previously identified significant impacts, and therefore no revisions to the analysis in the 1996 EIR is required related to this area of impact.

As presented above, there are changes in the circumstances under which the project would be undertaken that could result in new significant impacts or substantial increase in the severity of previously identified significant impacts due to changes in General Plan policy related to acceptable LOS at various intersections, and therefore revisions to the analysis in the 1996 EIR are required related to this area of impact. Implementation of Mitigation Measure 4.8-4 would reduce the impact to a less-than-significant level

There is no new important information relevant to this area of impact that was not previously known at the time of the 1996 EIR. There are no related new significant impacts, more substantial increase in the severity of previously identified significant impacts, previously dismissed mitigation that is now feasible, previously dismissed alternatives that are now feasible, or different more effective alternatives that have emerged or become known.

Mitigation Measure 4.8-4

The Board shall make the following findings to ensure consistency with the General Plan and CCAP, if this project is approved: The Board hereby finds that acceptance of a reduced Level of Service under existing and future conditions at the intersection of SR 16 and CR 96 is appropriate pursuant to Policy CI-3.1(X) of the General Plan which allows for such exceptions in recognition of the benefits of preserving agriculture or open space land; enhancing the agricultural economy; preserving the rural character of the county; avoiding adverse impacts to alternative transportation modes; avoiding growth inducement; and where right-of-way constraints would make the improvements infeasible.

Significance After Mitigation:

With implementation of mitigation measure identified above, the impact is considered less-than-significant.

Table 4.8-4: Consistency with Applicable Policies and Regulations

Policy/Regulation	Consistency Discussion
Yolo County General Plan	
Policy CI-3.1 Maintain Level of Service (LOS) C or better for roadways and intersections in the unincorporated county. In no case shall land use be approved that would either result in worse than LOS C conditions, or require additional improvements to maintain the required level of service, except as specified below. The intent of this policy is to consider level of service as a limit on the capacity of the County's roadways.(Only those segments relative the project site are shown) E. State Route 16 (County Road 78 to County Road 85B) – LOS D is acceptable. F. State Route 16 (County Road 85B to County Road 21A) – LOS E is acceptable. G. State Route 16 (County Road 21A to Interstate 505) – LOS D is acceptable, assuming that this segment is widened to four lanes with intersection improvements appropriate for an arterial roadway. The County will secure a fair share towards these improvements from planned development. Caltrans and the Rumsey Band of Wintun Indians shall be encouraged to provide funding for the project. H. State Route 16 (Interstate 505 to County Road 98) – LOS D is acceptable, assuming that passing lanes and appropriate intersection improvements are constructed. The County will secure a fair share towards these improvements from all feasible sources. Caltrans and the Rumsey Band of Wintun Indians shall be encouraged to establish a funding mechanism to pay the remainder. X. Additional exceptions to this policy may be allowed by the Board of Supervisors on a case-by-case basis, where reducing the level of service would result in a clear public benefit. Such circumstances may include, but are not limited to, the following: 1. Preserving agriculture or open space land; 2. Enhancing the agricultural economy;	As demonstrated in project Traffic Operations Memorandum (Appendix K), the proposed project would be consistent with the County's LOS standards for all but one of the study intersections. As noted above, the proposed project could conflict with the County's LOS standards at the following intersection: • SR 16/County Road 96 Policy CI-3.1(X) allows exceptions to the target LOS identified for various roadway segments based on a case-by-case determination by the Board of Supervisors, and several of the exceptions are applicable to the project. Implementation of Mitigation Measure 4.8-4 would ensure that the Board makes findings that the exceptions apply to ensure consistency with the General Plan and CCAP, if this project is approved. Therefore, the project would be consistent with this policy.

3. Preserving scenic roadways/highways; 4. Preserving the rural character of the county; 5. Avoiding adverse impacts to alternative transportation modes; 6. Avoiding growth inducement; or 7. Preserving downtown community environments. 8. Where right-of-way constraints would make the improvements infeasible.	
Policy CI-3.4 Define level of service consistent with the latest edition of the Highway Capacity Manual and calculate using the methodologies contained in that manual. At a minimum, weekday AM and PM peak hour traffic volumes will be used in determining compliance with the level of service standard. For recreational and other non-typical peak hour uses, weekday afternoon, weekday late evening, or weekends shall be considered.	LOS at the study roadway facilities has been evaluated consistent with the HCM 6th edition (see Appendix K). Standard peak hour periods of 7:00 AM to 9:00 AM and 5:00 PM to 6:00 PM were determined to be appropriate for the proposed project. Therefore, the proposed project is consistent with this policy.
Policy CI-3.7 • Consider designs for planned roadway capacity improvements that recognize the unique conditions associated with rural and agricultural areas in accordance with established standards including, but not limited to, the following: American Association of State Highway and Transportation Officials (AASHTO) publication "A Policy on Geometric Design of Highways and Streets;" • Caltrans' Main Streets: Flexibility in Design and Operations; • Federal Highway Administration's Flexibility in Highway Design; • 2007 California Fire Code; and • Institute of Transportation Engineers' Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities.	No new roadway improvements are proposed. Therefore, the proposed project is consistent with this policy.
Policy CI-3.9 To the greatest feasible extent, require new development to construct safety improvements consistent with current design standards on existing roadways that are anticipated to accommodate additional traffic from planned development.	The project is not proposing to modify the existing transportation network, alter the approved haul route, change the vehicle mix, or contribute traffic above currently permitted levels. No new safety improvements are warranted; therefore, the project is consistent with this policy.
Policy CI-3.11 Require new development to finance and construct all off-site circulation improvements necessary to mitigate a project's transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts,	See discussion of Mining Ordinance Section 10-4.409 below.

and impacts to the State Highway System). For mitigation to be considered feasible, it must be consistent with the policies of the General Plan.	
Policy CI-3.12 Collect the fair share cost of all feasible transportation improvements necessary to reduce the severity of cumulative transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts).	See discussion of Mining Ordinance Section 10-4.409 below.
Policy CI-3.13 Ensure that transportation and circulation improvements (including improvements to comply with County design standards) are constructed and operational prior to or concurrent with the need, to the extent feasible.	No modifications to the existing transportation network are anticipated at this time. Should modifications be undertaken in the future, CEMEX would comply with County design standard requirements. Therefore, the proposed project would be consistent with this policy.
Policy CI-3.16 Ensure that funding for the long-term maintenance of affected roads is provided by planned development.	See discussion of Mining Ordinance Section 10-4.409 below.
Policy CI-3.18 Ensure adequate access for emergency vehicles.	Existing routes are adequate for emergency access to the project site. The proposed project would not modify access routes. Thus, the proposed project would be consistent with this policy.
Off-Channel Mining Plan	
Action 2.4-21 Ensure that each mining operation adheres to approved haul routes and approved ingress/egress locations. Ensure through conditions of approval and other appropriate mechanisms that mining operations are funding their fair share of roadway and related impacts, including both one-time improvements and ongoing operations and maintenance, along approved haul routes and in proximity to approved operation ingress/egress locations.	Aggregate trucks going to and from the CEMEX operation currently access the plant from its entrance on SR 16. Trucks are required to use designated haul routes of State Route 16 to and from Interstates 5 and 505. Local deliveries are allowed to use roads other than State Route 16. The project does not propose changes to the designated haul routes. With regards to funding, see Mining Ordinance Sections 10-4.408 and 10-4.409 below. The proposed project would comply with this action.
Off-Channel Surface Mining Ordinance	
Section 10-4.402 The first one-hundred (100) feet of access road intersecting a County-maintained road shall be surfaced in a manner approved by the Public Works Department, with an approach constructed to County standards. Traffic control and warning signs shall be installed as required by the Public Works Department.	The proposed project would use the existing driveway access road that connects directly to SR 16 (not a County Road). Thus, the proposed project would be consistent with this ordinance.
Section 10-4.408 It is the intent of this program that each operator shall pay for any road improvements determined to be necessary to support their operation consistent with County and CCAP standards, and for ongoing operations and maintenance. Each operator shall pay its fair share toward improvements required to maintain a structural capacity (traffic index)	See discussion of Mining Ordinance Section 10-4.409 below

sufficient for the project traffic and to maintain operations on County roads and on State Highways within the OCMP planning area consistent with applicable General Plan policies related to LOS and applicable State policy related to VMT. Fair share mitigation shall also be required to improve existing operational as well as structural deficiencies of the transportation system. Specific locations shall be identified through the project- specific environmental review process for each operator's long-term mining permit application. Each operator shall participate in a funding program operated by the County which is designed to ensure that all improvements are made in a timely manner and that a reimbursement mechanism is in place to ensure repayment of any costs contributed in excess of fair share amounts. The program shall be initiated upon the approval of the long-term mining permits and shall be updated biennially by the County to ensure any new or modified impacts or funding sources are being addressed. Each operator shall have the option to complete the work at their expense without triggering the competitive bid process, as long as they comply with the applicable legal requirements of the County. If the operator declines the option, the County shall utilize the competitive bid process.	
Section 10-4.409 The operator shall agree to assume joint pavement maintenance responsibility with the County (or shared with another producer using the same roadway) for all County roads along a designated haul route from the access point of the surface mining operation to an appropriate State Highway. The County will provide maintenance of the county-maintained roadside drainage ditches, traffic signs, and striping. By May 15 of each year, the operator shall submit to the County an annual evaluation report documenting the structural integrity of the pavement structural section and the PCI of the roads maintained by the operator. The annual report shall be signed and sealed by a civil engineer licensed in the State of California. The report shall contain a proposed action plan for pavement maintenance and pavement improvements to maintain safe and efficient traffic operation on the roads, and a PCI of 70 or more, unless otherwise agreed by the County, as defined by American Society for Testing and Materials (ASTM) Method D6433 (Standard Practice for Roads and Parking Lots Pavement Condition Index Survey), for each upcoming year. Within 30 days, the County will review the report and recommend revisions if necessary. Following acceptance of the report by the	As stated in the Safety section above, CEMEX connects directly from a private road to SR 16 and does not use any County roads in its operation. Therefore, this regulation is not applicable to the CEMEX operation.

County, the operator shall secure a County encroachment permit specific to the action plan (at no cost to the operator) and complete the proposed pavement maintenance and improvement activities prior to the submittal of the annual report. Striping may be provided by the County if County striping equipment and material are available. Otherwise striping will be provided by the operator. Once the work is completed, the operator will resubmit the annual evaluation report by November 1 each year, and include the scope and dates that work was completed. If minor emergency asphalt repairs (work requiring a single County Public Works maintenance pick-up truck with asphalt patching material) are identified within the maintenance areas of the hauling routes after the Applicant's yearly maintenance has been completed, county crews will perform the minor asphalt repair maintenance once in a sixty (60) consecutive day period. The types of asphalt pavement failures requiring repairs include, but are not limited to, cracking, pot holes, depressions, rutting, shoving, upheaval, and raveling and any other pavement damage or failures requiring immediate repair by the county. If major emergency roadway repairs associated with the permitted activities (work requiring more than a single County Public Works maintenance pick-up truck with asphalt patching material, or minor asphalt repairs occurring in less than the sixty (60) consecutive day period) are identified after the Applicant's yearly maintenance has been completed, the Applicant shall obtain a County encroachment permit (at no cost to Applicant) and complete the major roadway repairs. If major roadway repairs that are the Applicant's fair share obligation are not completed by the Applicant in a timely manner as determined by the County, and the County must make repairs when the public's safety is considered at risk by the County Engineer, then the Applicant will be billed for the County's major roadway repair work on a time and materials basis. An applicant may coordinate with the County to have the County complete required improvements, and in such case, must fully fund the County's costs to do so. The operator does not assume the liability for the roadway, except for cases where the operator has not fulfilled its maintenance obligations. If a subsequent mining operation utilizes a road previously required to be improved pursuant to this subsection, then the subsequent operator shall be responsible for compliance with the agreements and requirements of the previous operator.	