

3.8 TRANSPORTATION AND TRAFFIC

As a result of the Initial Study, the Great Basin Unified Air Pollution Control District (District) determined that the 2008 Owens Valley PM₁₀ Planning Area Demonstration of Attainment State Implementation Plan (proposed project) had the potential to result in impacts to transportation and traffic during construction, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act Guidelines (State CEQA Guidelines).¹ Therefore, this issue has been carried forward for detailed analysis in this Subsequent Environmental Impact Report (EIR). This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to transportation and traffic and to identify potential alternatives.

The analysis of transportation and traffic includes a description of the regulatory framework that guides the decision-making process, existing conditions of the proposed project area, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts to transportation and traffic has been analyzed in accordance with Appendix G of the State CEQA Guidelines and the methodologies and significance thresholds provided by the Circulation element of the Inyo County General Plan,² State of California Department of Transportation (Caltrans) 2005 Traffic Volumes on California State Highways,³ Inyo County Regional Transportation Plan,⁴ 1997 Owens Valley PM₁₀ Planning Area Demonstration of Attainment State Implementation Plan (SIP) Final EIR,⁵ 2003 Owens Valley PM₁₀ Planning Area Demonstration of Attainment SIP Final EIR,⁶ the North Sand Sheet Shallow Flooding Project Initial Study,⁷ and the Southern Zones Dust Control Project Mitigated Negative Declaration.⁸

¹ Great Basin Unified Air Pollution Control District. 27 February 2007. *2008 Owens Valley PM₁₀ Planning Area Demonstration of Attainment State Implementation Plan Initial Study*. State Clearinghouse Number 2007021127. Bishop, CA.

² Inyo County Planning Department. December 2001. *Inyo County General Plan Update, Circulation Element*. Independence, CA.

³ State of California Department of Transportation. 2005 (Accessed 11 April 2007). *2005 Traffic Volumes on California State Highways*. Available at: <http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/2005all.htm>

⁴ Jones and Stokes. December 2001. *Regional Transportation Plan for Inyo County, California*. Sacramento, CA. Prepared for: Inyo County, Department of Public Works, Independence, CA.

⁵ Great Basin Unified Air Pollution Control District. 2 July 1997. *Owens Valley PM₁₀ Planning Area Demonstration of Attainment State Implementation Plan Final Environmental Impact Report*. State Clearinghouse Number 96122077. Bishop, CA.

⁶ Great Basin Unified Air Pollution Control District. February 2004. *2003 Owens Valley PM₁₀ Planning Area Demonstration of Attainment State Implementation Plan Integrated Environmental Impact Report*. State Clearinghouse House Number 2002111020. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

⁷ City of Los Angeles Department of Water and Power. February 2000. *Initial Study for North Sand Sheet Shallow Flooding Project; Owens Lake Dust Mitigation Program, Owens Lake, California*. Prepared by: CH2M HILL, Santa Ana, CA.

⁸ City of Los Angeles Department of Water and Power. August 2001. *Mitigated Negative Declaration Southern Zones Dust Control Project, Owens Lake Dust Mitigation Program, Owens Lake, California*. Prepared by CH2M HILL, Santa Ana, CA.

3.8.1 Regulatory Framework

Federal

National Environmental Policy Act

The National Environmental Policy Act (NEPA) and its supporting federal regulations establish certain requirements that must be adhered to for any project "...financed, assisted, conducted or approved by a federal agency...." In making a decision on the issuance of federal grant monies or a permit to conduct work on federal lands for components of the proposed project, the federally designated lead agency pursuant to NEPA is required to "...determine whether the proposed action may significantly affect the quality of the human environment." Only those portions of the proposed project conducted on Bureau of Land Management (BLM) land may require compliance with this regulation.

State

California Water Code

The proposed project is subject to the State of California Water Code, Division 12, Part 5, Chapter 1, Article 4, Section 31060 titled "Construction of Rights of Way."⁹ Any mitigation measure required to be implemented in a State right-of-way would require a Caltrans Encroachment Permit. Mitigation in excess of \$300,000 would require a Caltrans Project Study Report. Caltrans recommended that large-sized trucks transporting construction materials and equipment be limited to off-peak commute periods and any heavy construction equipment that requires the use of oversize transport vehicles on state roadways or facilities would require a Caltrans transportation permit. The construction scenario defined for the proposed project would not require the transport of oversize vehicles on state facilities.

Regional

Regional Transportation Plan

The Regional Transportation Plan identifies the transportation needs of Inyo County and specifies a course of action that policy makers of Inyo County should pursue to achieve a balanced transportation system for both people and goods.¹⁰ This document has a short-term horizon of up to 10 years and a long-term horizon of 20 years. Local, state, and federal agencies with jurisdiction over the quality of Inyo County's transportation system use the Regional Transportation Plan as a tool in policy design. Potentially relevant policies include the following:

Policy 1.1.1 Priority List for Maintenance, Rehabilitation, and Reconstruction

Establish a priority list based on the premise that maintenance, rehabilitation, and reconstruction of the existing highway system have the highest consideration for available funds.

Policy 2.1.2 Safer Truck Transportation

Facilitate safer truck transportation and ease the impact of truck traffic on residential areas.

⁹ West's Annotated California Codes. 1984. *Water Code Sections 30000 to 38999. Official California Water Code Classification*. Vol. 69. St. Paul, MN: West Publishing Company.

¹⁰ Inyo County Department of Public Works. December 2001. *Regional Transportation Plan for Inyo County, California*. Prepared by: Jones and Stokes, Sacramento, CA.

Policy 2.3.2 Priority to Efficiency Projects

Give priority to transportation projects designed to improve the efficiency, safety, and quality of existing facilities.

Policy 3.2.1 Improve State Routes as Necessary

Improve State Routes as funding allows.

Local

Inyo County General Plan

Circulation Element

The Circulation element of the Inyo County General Plan provides a summary of the existing conditions in the planning area, major issues, goals, and policies as well as pertinent implementation measures related to traffic and circulation and related to a variety of transportation means (roadways and highways, scenic highways, public transportation, bicycles and trails, railroads, aviation, canals, pipelines, and transmission cables). Relevant policies include the following:¹¹

Policy RH-1.1 Prioritize Maintenance, Rehabilitation, and Reconstruction. Prioritize improvements based on the premise that maintenance, rehabilitation, and reconstruction of the existing highway and roadway system to protect public safety has the highest consideration on available funds.

Policy RH-1.5 Proper Access. Provide proper access to residential, commercial, and industrial areas.

Policy RH-1.6 Minimize Environmental Impacts. Ensure that all transportation projects minimize adverse effects on the environment of the County.

Policy RH-1.7 Maximize State and Federal Funds. Pursue all means to maximize state and federal funds for roadway and highway improvements and maintenance.

Policy RH-1.8 Priority to Efficiency Projects. Give priority to transportation projects designed to improve the efficiency, safety, and quality of existing facilities.

Policy RH-2.1 Improve U.S. 395 in Sections. Support improvements to U.S. 395 as funding allows

3.8.2 Existing Conditions

The roadway network in the vicinity of the proposed project area includes U.S. Highway 395, State Route (SR) 136, and SR 190 as shown in Figure 3.8.2-1, *Existing Regional Roadway System*. The existing lane configurations of U.S. Highway 395, SR 136, and SR 190 in the project vicinity and their intersections are displayed in Figure 3.8.2-2, *Existing Roadway Configuration*. There are several unimproved roads that also provide access to the Owens Lake playa.

¹¹ Inyo County Planning Department. December 2001. *Inyo County General Plan, Land Use Element*. Independence, CA.

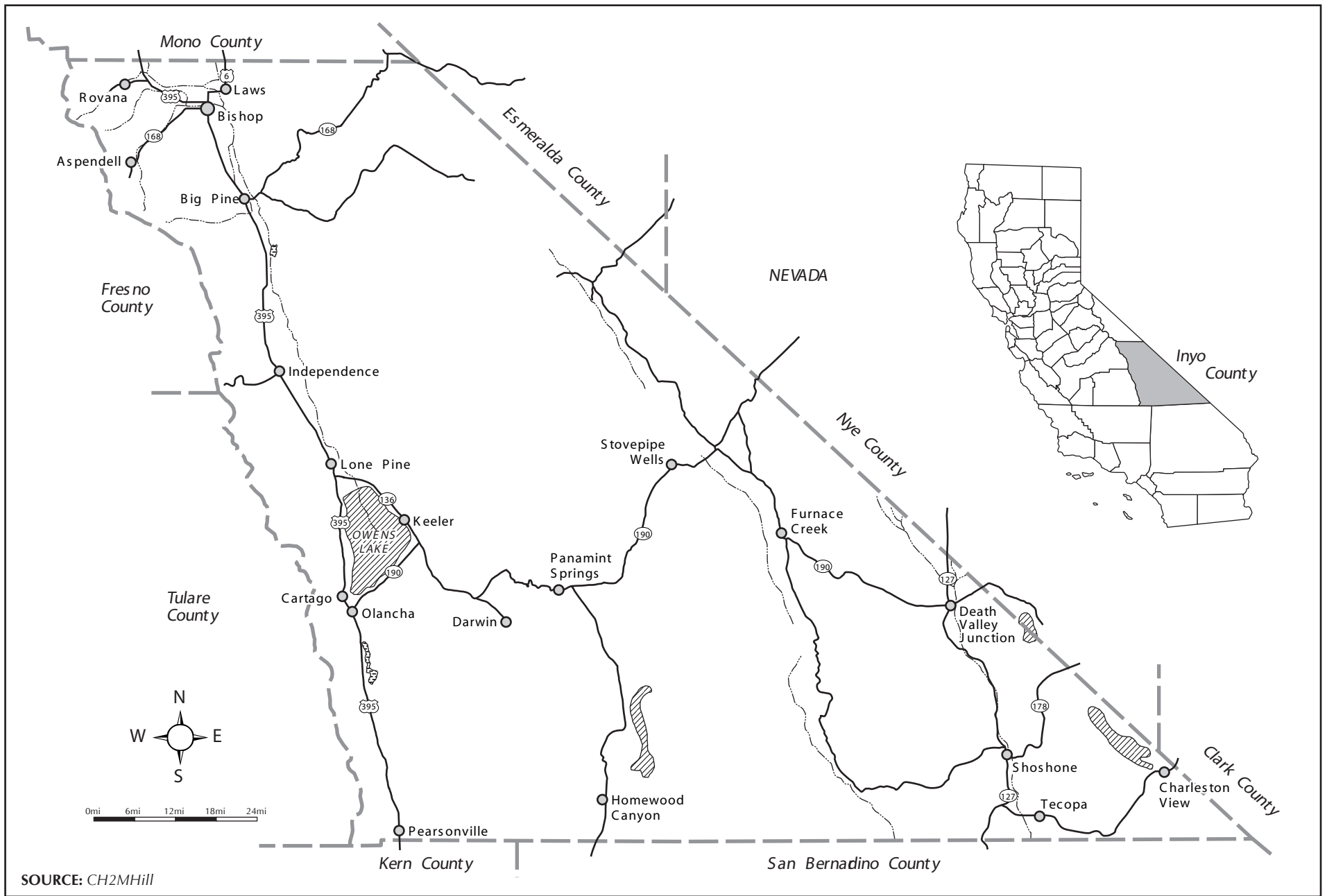


FIGURE 3.8.2-1
Existing Regional Roadway System

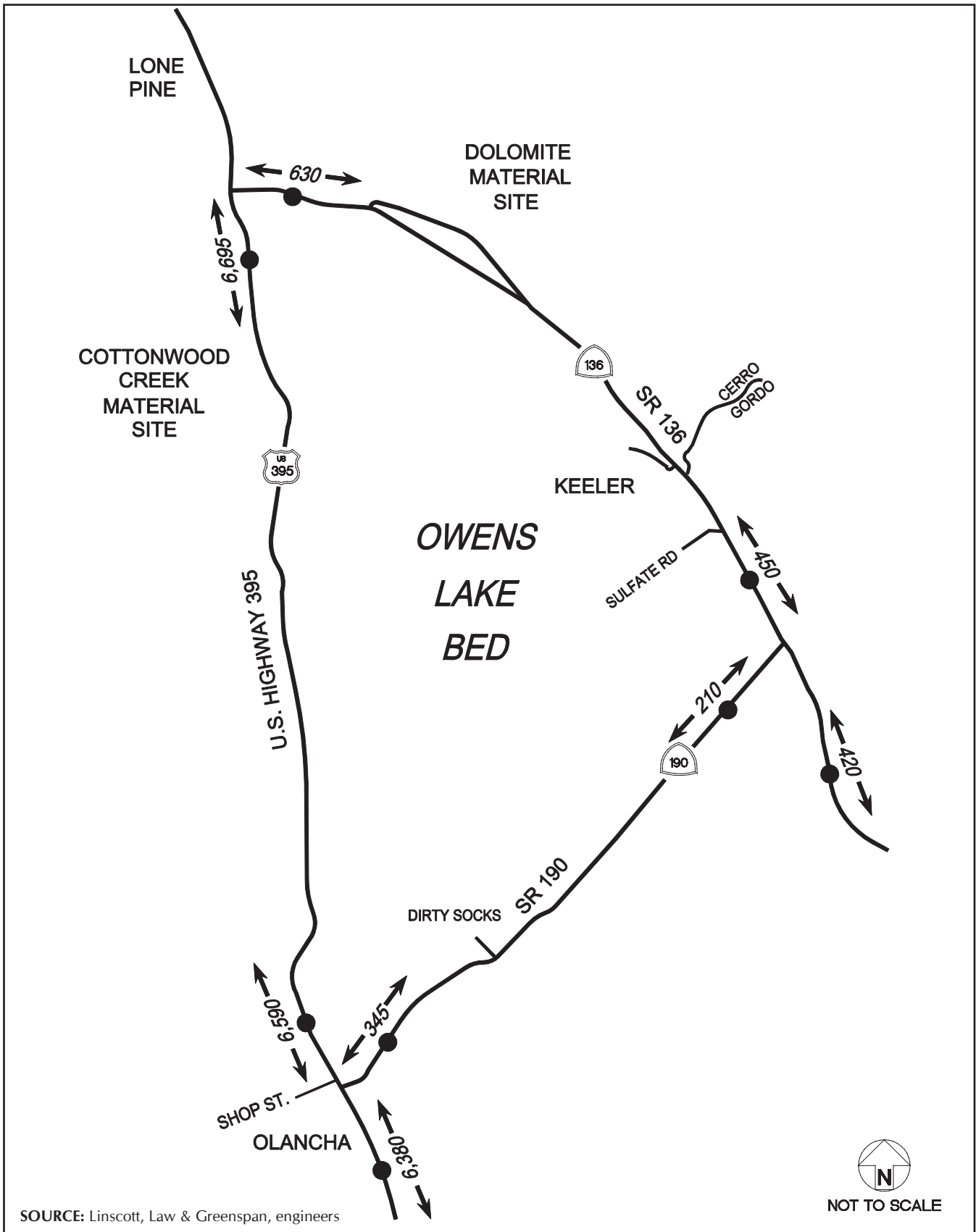


FIGURE 3.8.2-2
Existing Roadway Configuration

Regional Roadway System

U.S. Highway 395

U.S. Highway 395 is the main transportation route through Inyo County. It is part of the Inter-Regional Road System and is functionally classified as a Rural Principal Arterial. The highway connects the project area with Mono County and Reno to the north and with the Southern California metropolitan area to the south.

Adjacent to Owens Lake, most of U.S. Highway 395 is a divided four-lane expressway. It is a major roadway used by commercial traffic traveling within the Owens Valley and by recreational traffic traveling between Death Valley and the Sierra Nevada Mountain Range. U.S. Highway 395 is a four-lane divided highway from Cartago to just south of SR 136, where it transitions to a two-lane highway.

At the U.S. Highway 395 intersection with SR 136, one exclusive left-turn lane and two through lanes are provided at the southbound approach on U.S. Highway 395, and two through lanes and a channelized right-turn-only lane are provided at the northbound approach on U.S. Highway 395. A southbound departure auxiliary lane is also provided for the westbound left-turn movement from SR 136. Twelve-foot-wide lanes with unimproved gravel shoulders are provided in each direction on this highway near the SR 136 intersection and in the project vicinity. The posted speed limit along U.S. Highway 395 at SR 136 ranges from 55 miles per hour south of the intersection to 45 miles per hour north of the intersection.

At the U.S. Highway 395 intersection with SR 190, one exclusive left-turn lane and one combination through/right-turn lane is provided at the southbound approach on U.S. Highway 395, and one combination left-turn/through lane and one right-turn only lane is provided at the northbound approach on U.S. Highway 395. Twelve-foot-wide lanes with unimproved gravel shoulders are provided in each direction on this highway near the SR 190 intersection and in the project vicinity. The posted speed limit along U.S. Highway 395 at SR 190 is 55 miles per hour just north of the intersection.

State Route 190

SR 190 is a two-lane highway that is oriented southwest to northeast between U.S. Highway 395 to the west and SR 136 to the east. Twelve-foot-wide lanes with unimproved gravel shoulders are provided in each direction on SR 190 in the project vicinity. This highway serves as a primary access to the southern portions of Owens Lake.

At the SR 190 intersection with U.S. Highway 395, two-way stop control is provided at the approaches on SR 190. The west leg on the intersection has recently been closed. One combination left-turn/through/right-turn lane is provided at both the eastbound and westbound approaches on SR 190 at the U.S. Highway 395 intersection.

At the SR 190 intersection with SR 136, which is a "T" intersection, a one-way stop sign control is provided at the eastbound approach on SR 190. One combination left-turn/right-turn lane is provided at the eastbound approach on SR 190 at the SR 136 intersection.

State Route 136

SR 136 is a two-lane highway that is oriented northwest to southeast between U.S. Highway 395 to the north and SR 190 to the south. Twelve-foot-wide lanes with unimproved gravel shoulders are provided in each direction on SR 136 in the project vicinity. Primary access to the northern and eastern portions of Owens Lake is provided via this highway.

At the SR 136 intersection with U.S. Highway 395, which is a "T" intersection, a one-way stop sign control is provided at the westbound approach on SR 136. One combination left-turn/through lane and one channelized right-turn-only lane are provided at the westbound approach on SR 136 at the U.S. Highway 395 intersection.

At the SR 136 intersection with SR 190, which is a "T" intersection, a one-way stop sign control is provided at the eastbound approach on SR 190. One combination through/right-turn lane and one combination left-turn/through lane are provided at the southbound and northbound approaches on SR 136, respectively, and at the SR 190 intersection.

Existing Traffic Volumes and Level of Service

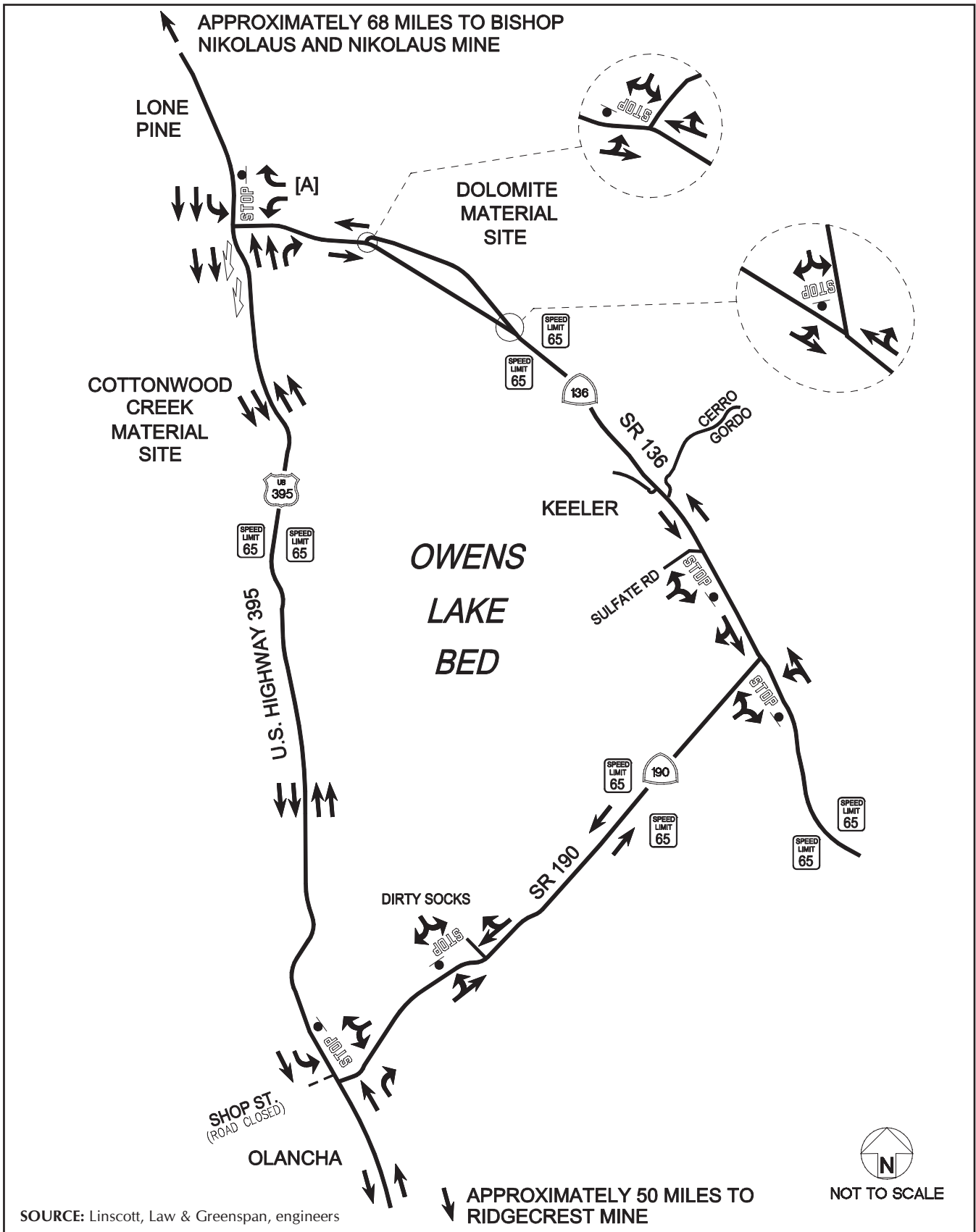
Recent traffic counts for U.S. Highway 395, SR 136, and SR 190 in the project vicinity were researched from data provided by Caltrans.¹² The Caltrans publication lists year 2005 traffic volumes for all count locations on the California state highway system. Peak hours, peak month average daily traffic (ADT) volumes and annual ADT (AADT) volumes are shown for each count location in the publication. Significant volume changes (breakpoints) in the traffic profile along each route are counted and identified by name and milepost value.

AADT is the total traffic volume for the year divided by 365 days. The traffic count year is from October 1 through September 30. Very few locations in California are actually counted continuously. Traffic counting is generally performed by electronic counting instruments moved from location to location throughout the State in a program of continuous traffic count sampling. The resulting counts are adjusted to an estimate of AADT by compensating for seasonal influence, weekly variation and other variables that may be present. AADT is necessary for presenting a statewide picture of traffic flow, evaluating traffic trends, computing accident rates, planning and designing highways, and other purposes.

The AADT volumes on U.S. Highway 395, SR 136, and SR 190 in the vicinity of Owens Lake are presented in Figure 3.8.2-3, *Existing Annual Average Daily Traffic Volumes*.¹³ Methodology and summary data worksheets of the AADT counts from the Caltrans publication are contained in Appendix H, *Traffic Study*.

¹² California Department of Transportation. June 2006. *2005 Traffic Volumes (Annual Average Daily Traffic (AADT)) for all vehicles on California State Highways*. Available at: www.dot.ca.gov/hq/traffops/saferes/trafdata/2005all/docs/2005AADT.xls.

¹³ The 2005 traffic counts were increased by 4.6 percent (i.e., an annual average rate increase of 2.3 percent per the traffic trend contained in the Caltrans publication) to reflect Year 2007 existing traffic volumes. Thus, the existing traffic volumes utilized in this analysis reflect Year 2007 conditions.



[A] FREE-FLOW MOVEMENT

FIGURE 3.8.2-3
Existing Annual Average Daily Traffic Volumes

The highway capacity as determined by the Highway Capacity Manual 2000 for a two-lane highway is 1,600 passenger cars per hour (pc/h) for each direction of travel; the capacity of a two lane-highway is 3,200 pc/h for both directions of travel combined.¹⁴ Highway capacities are further discussed in Appendix H.

Level of service (LOS) is a measure of traffic operation condition whereby a letter grade, A through F, corresponding to progressively worsening operation conditions, is assigned to an intersection or roadway segment. Table 3.8.2-1, *Level of Service*, describes the traffic conditions associated with each level. Methodology used in determining the existing LOS of U.S. Highway 395, SR 136, and SR 190 in the vicinity of Owens Lake is contained in Appendix H.

**TABLE 3.8.2-1
LEVEL OF SERVICE**

Level of Service	Description	Delay	Average Vehicle to Capacity Ratio
A	Free flow. Users are unaffected by other traffic; freedom of speed and movement, level of comfort, convenience and safety are excellent.	Little or no delay	0.0–0.59
B	Stable flow. Users begin to notice other traffic; freedom of speed continues, but freedom to maneuver declines slightly.	Short traffic delays	0.6–0.069
C	Stable flow. Traffic may back up behind turning vehicles. Most drivers feel somewhat restricted. Traffic signals operate at maximum efficiency.	Average traffic delays	0.7–0.79
D	Approaching unstable flow. Maneuverability is severely limited during short periods when traffic backs up temporarily. Comfort, convenience, and safety are affected. Users wait one signal cycle to pass through a signalized intersection.	Long traffic delays	0.8–0.89
E	Unstable flow. Traffic volumes are at or near capacity; users wait several cycles to pass through a signalized intersection.	Very long traffic delays	0.9–0.99
F	Forced flow. Traffic volumes exceed the capacity of the street and traffic queues develop. Stop-and-go traffic conditions predominate.	Excessive delay	≥ 1.0

SOURCE: Adapted from Transportation Research Board 1980, 1994.

U.S. Highway 395

The AADT volume on U.S. Highway 395 between SR 136 and SR 190 is 6,695 and 6,590 vehicles per day respectively, with a peak hour traffic volume of 1,175 vehicles.¹⁵ This AADT volume is well below the capacity of the four-lane section of the highway as determined by the Highway Capacity Manual 2000, extending between SR 136 and SR 190. U.S. Highway 395 currently operates at LOS A under existing conditions.

¹⁴ Transportation Research Board. 2000. *Highway Capacity Manual 2000*. Available at: <http://gulliver.trb.org/bookstore>

¹⁵ Based on year 2005 traffic volumes adjusted to reflect year 2007 conditions.

State Route 136

The AADT along SR 136 ranges from 630 vehicles east of U.S. Highway 395 to approximately 450 vehicles near SR 190 at the Olancho cutoff.¹⁶ The peak hour traffic volume at both of these locations is 105 vehicles. The current traffic volume data indicates that this route is currently operating well below capacity as determined by the Highway Capacity Manual 2000. SR 136 currently operates at LOS A under existing conditions.

State Route 190

The SR 190 AADT volume east of U.S. Highway 395 is approximately 345 vehicles while west of SR 136 is approximately 210 vehicles.¹⁷ Peak hour traffic volumes range between 85 and 40 vehicles per hour along this segment. The current traffic volume data indicates that this route is currently operating well below capacity as determined by the Highway Capacity Manual 2000. SR 190 currently operates at LOS A under existing conditions.

No substantial LOS impacts are expected to occur given the relatively low traffic volumes on the surrounding highways, including U.S. Highway 395, SR136, and SR 190.

Air Traffic

Eleven sensitive airsheds exist in the Owens Valley (Figure 3.1.2-1, *Sensitive Airsheds in the Project Vicinity*), including military airspace associated with test flights conducted at the China Lake Naval Air Weapons Station (NAWS). The NAWS is located approximately 10 miles south of the proposed project site. The NAWS is a sensitive site for Owens Lake dust events. The boundary of the sensitive airspace encompasses the proposed project site.

Roadway Design Configurations

The proposed project would not require any changes to the existing design of the roadway network or increase incompatible uses. However, during the periodic events when equipment is hauled to the site, safety hazards associated with other oncoming or turning vehicles on U.S. Highway 395, SR 136, and SR 190 may result. In addition, heavy trucks transporting material and equipment may damage the roadway surface of SR 136. Impacts to transportation and traffic related to increasing hazards during construction due to turning vehicles or heavy trucks transporting materials and equipment to the site would be considered potentially significant, requiring mitigation.

Unpaved and gravel-paved, permanent all-year access roads will be constructed atop existing unimproved roads and used for construction, operation, and maintenance of the dust control areas. Access is currently provided from U.S. Highway 395 via the existing north and south mainline pipeline access roads, from State Route 136 via the existing Sulfate Road, and from State Route 190 via the existing Dirty Socks access road. Pipelines and buried power lines would be placed and constructed under, along, or close to these access roads. All lake bed roads are to be maintained in a substantially non-emissive condition through the use of water, brine, and/or gravel. In addition, existing impacts to transportation and traffic related to the construction of access roads to the site would not be considered potentially significant.

¹⁶ Based on year 2005 traffic volumes adjusted to reflect year 2007 conditions.

¹⁷ Based on year 2005 traffic volumes adjusted to reflect year 2007 conditions.

Existing Vehicular Emergency Access/Egress

The proposed project site is currently accessible to emergency vehicles via SR 136/Sulfate Road, SR 190/Dirty Socks access road and U.S. 395/North and South Mainline access roads.

3.8.3 Significance Thresholds

The potential for the proposed project to result in impacts related to transportation and traffic was analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines:

- Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)
- Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
- Result in inadequate emergency access
- Result in inadequate parking capacity
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)

The Circulation element of the Inyo County General Plan update has LOS criteria to correlate numerical traffic-volume data to subjective descriptions of traffic performance at intersections (Table 3.8.2-1). In accordance with this plan's policies, LOS C is considered the minimum acceptable standard for roadway segments. A potentially significant impact is considered when degradation of roadway segment LOS to below the adopted County standard or concept occurs.

3.8.4 Impact Analysis

Direct and Indirect Impacts

Traffic Volumes

The impact analysis of the project to traffic volumes analyzes only the construction phase since it generates the highest level of peak overall vehicle trips (approximately 272 daily trips with assumed estimate up to 72 trucks) compared to the operation scenario. Peak period of construction in conjunction with the 1998 SIP occurred in early summer 2002, with approximately 250 pieces of equipment and 200 construction personnel mobilized on site. Peak construction for the 2008 SIP dust control measures (DCMs) would be expected between late spring 2009 and early summer 2009, during installation of the Moat & Row DCM.

To provide a conservative worst-case analysis, all 272 daily vehicle trips anticipated to be generated by the project during the construction phase were assigned to each highway in the project vicinity. Based

on the roadway lane capacities of the highways, the future 2010 daily traffic volumes on the state highways and the forecast daily project trip generation, no significant impacts are expected to occur along U.S. Highway 395, SR 136, and SR 190. However, the transport of equipment to the project site, including the hauling of water lines, would result in a one-time, short-term impact because the majority of all equipment would be left onsite for the duration of construction. Under the operation scenario of the proposed project, the majority of activities during operation would not require the use of heavy trucks or a significant number of vehicles accessing the site (approximately 20 per week with assumed estimate of 3 to 4 vehicles a day).

Level of Service Analysis

U.S. Highway 395

Based on the capacity of the four-lane segment, traffic volume could increase by a factor of approximately 2.5 before LOS C, the minimum acceptable standard for roadway segments.

State Route 136

Current traffic volumes could increase by as much as a factor of 12 before approaching LOS C, designated as an undesirable LOS.

State Route 190

The existing traffic volumes could increase by as much as a factor of 10 before approaching LOS C. Therefore, U.S. Highway 395, SR 136, and SR 190 are projected to continue operating at LOS A with the addition of traffic generated by the construction of the project. Current traffic volume data indicate that the routes are operating well below capacity. Therefore, there are no expected impacts to transportation and traffic related to exceeding an established LOS standard.

Future Pre-Project Conditions Year 2010

U.S. Highway 395

The future pre-project AADT volume on U.S. Highway 395 between SR 136 and SR 190 is 7,155 and 7,045 vehicles per day respectively, with a peak hour traffic volume of 1,255 vehicles.¹⁸ This AADT volume is well below the capacity of the four-lane section of the highway, extending between SR 136 and 190. U.S. Highway 395 is forecasted to operate at LOS A under future pre-project conditions.

State Route 136

The AADT along SR 136 ranges from 675 vehicles east of U.S. Highway to approximately 480 vehicles near SR 190 at the Olancho cutoff.¹⁹ The peak hour traffic volumes at both of these locations is 112 vehicles, respectively. The forecast traffic volume data indicate that this route would continue operating well below capacity. SR 136 is forecasted to operate at LOS A under future pre-project conditions.

¹⁸ Year 2007 traffic volumes adjusted to reflect year 2010 conditions.

¹⁹ Year 2007 traffic volumes adjusted to reflect year 2010 conditions.

State Route 190

The SR 190 AADT volume east of U.S. Highway 395 is approximately 370 vehicles while west of SR 136 is approximately 210 vehicles.²⁰ Peak hour traffic volumes range between 90 and 45 vehicles per hour along this segment. The forecast traffic volume data indicates that this route would continue operating well below capacity. SR 190 is forecasted to operate at LOS A under future pre-project conditions.

Future With Project Conditions Year 2010

U.S. Highway 395

The future with project AADT volume on U.S. Highway 395 between SR 136 and SR 190 is 7,430 and 7,320 vehicles per day, respectively, with a peak hour traffic volume of 1,325 vehicles.²¹ This AADT volume is well below the capacity of the four-lane section of the highway, extending between SR 136 and 190. U.S. Highway 395 is forecasted to operate at LOS A under future with project conditions.

State Route 136

The AADT along SR 136 ranges from 950 vehicles east of U.S. Highway to approximately 750 vehicles near SR 190 at the Olancho cutoff.²² The peak hour traffic volumes at both of these locations is 180 vehicles, respectively. The forecast traffic volume data indicate that this route would continue operating well below capacity. SR 136 is forecasted to operate at LOS A under future with project conditions.

State Route 190

The SR 190 AADT volume east of U.S. Highway 395 is approximately 640 vehicles while west of SR 136 is approximately 500 vehicles.²³ Peak hour traffic volumes range between 115 vehicles per hour along this segment. The forecast traffic volume data indicates that this route would continue operating well below capacity. SR 190 is forecasted to operate at LOS A under future pre-project conditions.

Air Traffic Patterns

Eleven sensitive airsheds exist in the Owens Valley, including military airspace associated with test flights conducted at the China Lake NAWS. The NAWS is located approximately 10 miles south of the proposed air quality stations. The NAWS is a sensitive site for Owens Lake dust events. The boundary of the sensitive airspace encompasses the proposed project site. Given the nature of the proposed activity at the proposed project site, no adverse safety impacts to military flights are expected to occur.

Due to the distance between the proposed project site and the nearest commercial airport and the types of uses associated with the proposed project, no impacts to traffic and transportation related to a change in air traffic patterns that results in substantial safety risks are expected to occur.

²⁰ Year 2005 traffic volumes adjusted to reflect year 2010 conditions.

²¹ Year 2010 conditions.

²² Year 2010 conditions.

²³ Year 2010 conditions.

Hazardous Roadway Design

The proposed project would not require any changes to the existing design of the roadway network or increase incompatible uses. However, the periodic events during which equipment is hauled to the site may result in safety hazards associated with other oncoming or turning vehicles on U.S. Highway 395, SR 136, and SR 190. In addition, heavy trucks transporting material and equipment may damage the roadway surface of SR 136. The approximate number of heavy equipment used on site by the crew would total approximately 45 pieces, of which the majority would be left on site during construction. The transport of the equipment to the proposed project site, including the hauling of pipelines, may result in a one-time, temporary, short-term impact. Therefore, impacts to transportation and traffic related to substantially increasing hazards during construction due to turning vehicles or heavy trucks transporting materials and equipment to the site would be considered potentially significant, requiring mitigation.

Two new secondary access dirt roads will connect to existing primary access road State Route 395 to dust control areas T 37-1 and T 37-2 (Figure 2.7.1-1, *Proposed Project Elements*). Existing unimproved roadways may be widened from 20 feet wide to 30 feet wide to improve access to the project site and the safety of workers. Mats, grading, filling, compaction, and base-course may be placed at any "soft spot" location that may be encountered along the route. Secondary access roads will be approximately 30 feet wide, with centerline elevation 2 feet above existing grade and shoulder slopes of 3:1. The elevation of the access roads may increase to about 4 feet above existing grade on portions of the lake bed. However, these new access roads will not cause an impact in terms of hazardous roadway conditions.

Emergency Vehicle Access/Egress

The proposed project would not result in impacts to transportation and traffic in relation to inadequate emergency access. The proposed project site is currently accessible to emergency vehicles via SR 136/Sulfate Road, SR 190/Dirty Socks access road and U.S. 395/North and South Mainline access roads. No change in access is proposed. Therefore, there would be no expected impacts to transportation and traffic related to inadequate emergency access.

Parking Capacity

The proposed project would not result in impacts to transportation and traffic in relation to inadequate parking capacity. After project construction is completed, limited parking would be provided on the proposed project site to accommodate routine maintenance and monitoring vehicles. During construction period, employees would park their personal vehicles in designated areas near U.S. Highway 395 and SR 136 and SR 190. Existing or planned Park-n-Ride lots would not remove existing parking. Therefore, the proposed project would not impact transportation and traffic related to inadequate parking capacity.

Alternative Transportation

The proposed project would not result in impacts to transportation and traffic in relation to adopted policies, plans, or programs supporting alternative transportation. No existing or planned transportation facilities would be removed or prevented from being constructed or operated by construction and operation of the proposed project. Therefore, the proposed project would not result in a significant adverse impact related to adopted policies, plans, or programs supporting alternative transportation.

Cumulative Impacts

The proposed project would not be expected to result in significant cumulative impacts to transportation and traffic. A total of three related projects were identified in the vicinity of the proposed project. The potential impacts of the proposed project can be evaluated within the context of the cumulative impacts of all ongoing and proposed development.

In consideration of connection with the 2003 SIP, the proposed project would have temporary significant impacts to transportation and traffic during the construction phase, which would be mitigated to below the level of significance. However, the implementation of the proposed project would occur at a time when the 2003 SIP would have concluded its construction phase and begun its operational phase, where transportation and traffic would not be significantly impacted.

In consideration of connection with the Lower Owens River Project (LORP), the projects would not create considerable cumulative impacts to transportation and traffic because the implementation of the LORP does not result in any impacts to transportation and traffic. The LORP's main objective is to mitigate impacts related to groundwater pumping by the City of Los Angeles Department of Water and Power.

In consideration of connection with the activities undertaken by the U.S. Borax Owens Lake Soda Ash Company (U.S. Borax), Owens Lake Expansion Project/Conditional Use Permit #02-13/Reclamation Plant #02-1, the projects would not create considerable cumulative impacts to transportation and traffic. The proposed project would only result in significant impacts to transportation and traffic during the construction phase. However, the proposed project would incorporate mitigation measures that would reduce such impacts to below the level of significance. Therefore, the implementation of the proposed project when considered in conjunction with the effects of the U.S. Borax, Owens Lake Expansion Project/Conditional Use Permit #02-13/Reclamation Plant #02-1, would not result in cumulative impacts to transportation and traffic.

Therefore, the transportation and traffic impact of the proposed project would not be considerable when viewed in connection with the related transportation and traffic effects of other current projects.

3.8.5 Mitigation Measures

Measure Traffic-1, Traffic Work Safety Plan

The City of Los Angeles Department of Water and Power shall work with the State of California Department of Transportation to determine the necessity for traffic safety equipment to be installed and maintained on U.S. Highway 395, State Route 136, and State Route 190 in order to ensure traffic safety during construction of the proposed project by developing a Traffic Work Safety Plan. The Traffic Work Safety Plan shall specify the measures to be implemented and maintained by the City of Los Angeles Department of Water and Power on each location on U.S. Highway 395, State Route 136, and State Route 190 that would be affected by the construction phase of the project to ensure traffic safety. The plan should include measures such as signage to warn oncoming motorists of large slow-moving trucks ahead and flag persons to warn motorists of large slow-moving trucks ahead during peak periods and times of large load deliveries. The City of Los Angeles Department of Water and Power shall document to the Great Basin Unified Air Pollution Control District and California State Lands Commission that State of California Department of Transportation has approved the Traffic Work Safety Plan prior to the initiation of construction work specified by the 2008 Revised State Implementation Plan, or related transportation and staging of equipment and materials.

Measure Traffic-2, Traffic Work Safety Plan Conformance

The City of Los Angeles Department of Water and Power shall be responsible for funding, installing, and conforming to the measures specified in the approved Traffic Work Safety Plan prior to the use of U.S. Highway 395, State Route 136, and State Route 190 for gravel hauling or other heavy truck trips such as the delivery of materials, heavy equipment, and construction vehicles to the proposed project site to ensure traffic safety during the construction operations. The City of Los Angeles Department of Water and Power shall demonstrate conformance with the measures specified in the approved Traffic Work Safety Plan by submitting quarterly compliance reports to the Great Basin Unified Air Pollution Control District, California State Lands Commission, and State of California Department of Transportation throughout the duration of the construction work specified by the 2008 Revised State Implementation Plan, and related transportation and staging.

Measure Traffic-3, Regional Transportation Network Damage Repair

The City of Los Angeles Department of Water and Power shall be required to repair damage to the regional transportation network (U.S. Highway 395, State Route 136, and State Route 190) from construction activities required for the 2008 Revised State Implementation Plan to pre-project conditions. Prior to initiating construction of work specified by the 2008 Revised State Implementation Plan, or related transportation and staging of equipment and materials, the City of Los Angeles Department of Water and Power shall retain a qualified pavement consultant engineer to document the existing condition of all regional transportation network roadways used for access, egress, and haul routes by the construction activities required for the 2008 Revised State Implementation Plan. Following the completion of construction activities, the City of Los Angeles Department of Water and Power shall retain a qualified pavement consultant engineer to revisit the documented roadway sections and delineate physical damages that are directly attributed to construction activities required for the 2008 Revised State Implementation Plan. The City of Los Angeles Department of Water and Power shall provide in lieu fees for remediation of construction-generated impacts on the regional transportation network. Within 12 months after construction activities for the 2008 Revised State Implementation Plan is completed, the City of Los Angeles Department of Water and Power shall provide written documentation to the Great Basin Unified Air Pollution Control District, California State Lands Commission and State of California Department of Transportation demonstrating that damage to the regional transportation network that resulted from the construction activities has been repaired.

3.8.6 Level of Significance after Mitigation

Implementation of mitigation measures Traffic-1 through Traffic-3 would reduce significant impacts related to transportation and traffic to below the level of significance.