

4.15 Transportation

This section examines the effects of the Project on the transportation systems in the area. It not only considers circulation conditions but also investigates potential impacts on intersections and roadways. This section also describes the environmental setting, regulatory setting, identifies the applicable significance thresholds for impacts, assesses potential impacts of the Project, and recommends measures to mitigate any significant impacts, if applicable. The section also provides a discussion of cumulative impacts. Alternatives are discussed in Chapter 5.0, Alternatives.

As described in Chapter 2.0, Project Description, the Project would include the demolition of aboveground infrastructure and remediation of the site, followed by soil stabilization or revegetation of disturbed areas, with some minor long-term operations associated with remediation.

4.15.1 Environmental Setting

4.15.1.1 Background

The Santa Maria Refinery (SMR) has been a petroleum oil refinery since its construction in 1955. The SMR is linked to the San Francisco-area Rodeo Refinery by a 200-mile pipeline through which semi-refined liquid products are transferred for upgrading into finished petroleum products. The SMR also produces solid petroleum coke that leaves the SMR by rail or haul truck and recovered sulfur that is transported by haul truck. The SMR is currently surrounded by industrial, recreational, agricultural, residential, and open space land uses. Except when shut down for maintenance, the SMR operates 24 hours per day, 365 days per year.

Phillips 66 has discontinued receiving and processing crude oil at the SMR as of January 2023, and is conducting shut-down and decontamination activities at the facility under separate existing permits. As described in Chapter 2.0, Project Description, the Project would include the aboveground demolition and remediation of the site followed by soil stabilization or revegetation of disturbed areas, with some minor long-term operations associated with remediation. Potential future uses of the SMR site are unknown and are currently speculative; therefore, future uses are not considered in this Project.

The Project is on a portion of the Phillips 66 SMR property located at 2555 Willow Road in Arroyo Grande, California. Surrounding land uses include undeveloped land, Oceano Dunes State Vehicular Recreation Area (ODSVRA), Highway 1, residential communities, and California Department of Forestry and Fire Protection (CAL FIRE) Station 22.

4.15.1.2 Existing Vehicle Circulation Conditions

SMR traffic accessing U.S. Highway 101 from the Project site uses the following route: State Route 1 to Willow Road east to the Willow Road/U.S. Highway 101 interchange. SMR employees

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and contractors living in the Guadalupe, Oceano, and Grover Beach areas would likely access the site via State Route 1.

The number of crude oil, sulfur, and petroleum coke trucks entering the SMR during the baseline period (2017–2021) averaged 37 trucks per day, excluding chemical deliveries (which typically average about five deliveries per month) or waste disposals. Daily trip data for the baseline period are provided in Appendix C.

The on-site workforce has varied during the baseline period (2017–2021). The combined number of Phillips 66 employees plus full-time equivalent contractors ranged from a low of 141 in 2021 to a high of 197 in 2019, with approximately 40 on-site employees on weekends. Typically, two security personnel are present during nights and weekends. General refinery employees include office staff, operators, supervisors, and maintenance technicians.

State Route 1 from the SMR entrance north to Halcyon Road is primarily a north-south, two-lane arterial; portions of the roadway have a median turning lane near certain intersections. State Route 1 from the SMR entrance east to Willow Road (local) is an east-west, two-lane arterial. State Route 1 south of Willow Road is a north-south, two-lane arterial. Stretching from Willow Road south to W. Clark Avenue, State Route 1 is locally known as Guadalupe Road. It becomes Cabrillo Highway south of the town of Guadalupe and Casmalia Road south of Black Road.

Willow Road is a County of San Luis Obispo (County)-managed, east-west, two-lane minor arterial with access from the Project site via State Route 1. The intersection at Willow Road and State Route 1 is controlled by a stop sign on Willow Road. The Willow Road extension, completed in late 2012, provides a full access interchange at U.S. Highway 101 and extends Willow Road to N. Thompson Avenue. Willow Road is the County-designated truck route from the SMR to U.S. Highway 101.

Pomeroy Road is a County-managed, north-south, two-lane collector road with access from the Project site via Willow Road. The intersection at Pomeroy Road and Willow Road is controlled by a stop sign on Willow Road.

U.S. Highway 101 is a four- to six-lane highway that extends along the Pacific Coast between Los Angeles and San Francisco.

An unpaved pipeline maintenance road exists between the SMR property and sand dunes within the ODSVRA. This maintenance road is gated at the Phillips 66 property line, and Phillips 66 has no control over the railroad crossing.

4.15.1.3 Rail Traffic Conditions

The Union Pacific rail lines access the SMR property via the Union Pacific Coast Line, which runs from San Jose to Moorpark. Union Pacific operates freight rail services along this line, providing service that roughly parallels the U.S. Highway 101 corridor between San Jose in the north, and Camarillo in the south. Trains servicing the SMR property use various Union Pacific tracks that are shared with a number of intercity passenger rail lines. Historically, the SMR property generated

petroleum coke railcars, which were hauled weekly by a Union Pacific train delivering empty cars and hauling loaded cars (see Chapter 2.0, Project Description).

Coast Starlight and Pacific Surfliner

The Coast Starlight is a Federal Amtrak train that runs between Los Angeles and Seattle. The Coast Starlight operates one round-trip per day. This passenger train makes two stops in the County (City of San Luis Obispo and Paso Robles). Both of these trains use Union Pacific Railroad (UPRR) track and would share a considerable distance of UPRR track with a train traveling to the SMR.

The Pacific Surfliner is a California Amtrak train that operates between San Diego and San Luis Obispo. The Pacific Surfliner operates two round-trips per day between San Diego and San Luis Obispo, three round-trips between San Diego and Goleta, and eight round-trips between Los Angeles and San Diego. This passenger train makes two stops in the County (City of San Luis Obispo and Grover Beach).

4.15.1.4 Methods of Describing Transportation Conditions

Level of Service

Transportation conditions are often described in terms of levels of service (LOS). LOS describes the existing volume of traffic on a roadway compared to the design capacity of the roadway. The design capacity of a roadway or intersection is defined as the maximum rate of vehicle travel (e.g., vehicles per hour) that can reasonably be expected along a section of roadway or through an intersection. Capacity depends on several variables, including road classification and number of lanes, location and presence of turning lanes, signal timing, road condition, terrain, weather, and driver characteristics. LOS is generally a function of the ratio of traffic volume to the capacity of the roadway or intersection or the delays associated with an intersection. The LOS ratings also use qualitative measures that characterize operational conditions within a traffic stream and their perception by motorists. These measures include freedom of movement, speed and travel time, traffic interruptions, types of vehicles, comfort, and convenience.

Trucks and intersections also affect LOS classifications. Trucks and other large, heavy vehicles or slower moving vehicles affect LOS because they occupy more roadway space and have reduced operating qualities compared to passenger cars. Since heavy vehicles accelerate slower than passenger cars, gaps form in traffic flows that affect the efficiency of the roadway. Intersections present several variables that can influence LOS, including curb parking, transit buses, turn lanes, signal spacing, pedestrians, stop sign arrangements, and signal timing.

In 2021, the California Department of Transportation (Caltrans) reported average annual daily traffic (AADT) of 8,000 on State Route 1 near the Project driveway. This is well below the capacity of the roadway.

The LOS for intersections is based on the 6th Edition of the Highway Capacity Manual (TRB 2017) and are generated based on the delay at the intersection (expressed in seconds) and the number of vehicles that back up at an intersection for each traffic light cycle. Table 4.15.1 provides peak hour delay, number of vehicles and LOS for existing Project conditions along the Willow Road corridor based on data collected in 2018 at a time when the SMR was in full operation.

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Table 4.15.1 Existing Traffic Level of Service for Project-Related Roadway Intersections

Intersection	Peak Hour	Delay seconds seconds (vehicles)	LOS
Willow Road/State Route 1	AM	4.9 (12.4)	B
	PM	4.4 (13.4)	B
Willow Road/Pomeroy Road	AM	20.8	C
	PM	21.2	C
Willow Road/Hetrick Avenue	AM	4.2 (31.2)	D
	PM	1.8 (17.7)	C
Willow Road/U.S. 101 SB Ramps	AM	2.2 (12.8)	B
	PM	4.5 (12.7)	B
Willow Road/U.S. 101 NB Ramps	AM	32.1 (181.0)	F
	PM	8.6 (18.9)	C

Source: County 2021b

Vehicle Miles Traveled

California Office of Planning and Research, California Environmental Quality Act

The State California Environmental Quality Act (CEQA) Guidelines discuss use of the LOS methodology for transportation analyses in CEQA documents. In response to Senate Bill 743, in December 2018, the California Natural Resources Agency certified and adopted CEQA Guideline updates that implement changes to the methodology used to assess traffic impacts in CEQA documents. The Guidelines require an alternative to LOS for evaluating transportation impacts by enhancing or replacing the typical LOS analysis with a vehicle miles traveled (VMT) analysis. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts.

The CEQA Guidelines update states that “[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” (CEQA Guidelines §15064.3 (d)).

CEQA Section 15064.3

This update to CEQA, effective December 28, 2018, codifies a switch from LOS to VMT as the metric for transportation impact analysis.

This section describes specific considerations for evaluating a project’s transportation impacts. Generally, VMT 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.

Section 15064.3 (b) provides the 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; and
- (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.

The Governor's Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impact in CEQA with the new VMT requirement states the following: "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks (OPR 2018). OPR also indicates that "absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact" (OPR 2018).

The San Luis Obispo Council of Governments' (SLOCOG) Regional Transportation Plan (RTP; SLOCOG 2023) reports annual VMT per capita within the County, noting that the metric is closely aligned with economic conditions and was heavily affected by COVID-19. SLOCOG estimates that the countywide VMT per capita was 27.9 in 2020.

Roadway Safety

Roadway safety is typically quantified as a collision rate per million vehicle miles on a roadway segment or collisions per million entering vehicles for an intersection. Collision data is compiled and processed in the Statewide Integrated Traffic Records System (SWITRS). Caltrans maintains the Traffic Accident Surveillance and Analysis System (TASAS), a database of collisions on the State Highway system.

Railroad Congestion

The on-time performance (OTP) of the Coast Starlight and Pacific Surfliner historically provides a measure of railroad congestion. The end point OTP measures how a train actually performs compared to the published schedule at the last station on the run. The metric uses the actual departure time at the origin point of the train and the actual arrival time of the train at the last stop for the reporting period. As per the Federal Railroad Association (FRA 2023), the percentage of time the trains were on-time over the reporting period for all stations met the target (80 percent) OTP for the Pacific Surfliner in 2014 (at 86 percent; FRA 2014) but deteriorated to just under the threshold in 2023 (79 percent). For the Coastal Starlight, the OTP did not meet the target for all stations criteria in 2014 (50 percent) but improved in 2023 (to 62 percent).

4.15.2 Regulatory Setting

4.15.2.1 Federal Regulations

The federal government delegates the responsibilities of the maintenance and regulation of roadways to state and local governments.

The Federal Railroad Administration (FRA) is responsible for regulating the safety of the Nation's railroad system and development of inter-city passenger rail. The FRA's mission is to enable the safe, reliable, and efficient movement of people and goods. The Rail Safety Improvement Act of 2008 (RSIA) directed the FRA to, among other things, promulgate new safety regulations. These new regulations govern different areas related to railroad safety, such as hours of service requirements for railroad workers, positive train control implementation, standards for track inspections, certification of locomotive conductors, and safety at highway-rail grade crossings.

The Passenger Rail Investment and Improvement Act of 2008 (PRIIA) reauthorized the National Railroad Passenger Corporation, better known as Amtrak, and strengthens the U.S. passenger rail network by tasking Amtrak, the U.S. Department of Transportation (U.S. DOT), the FRA, states, and other stakeholders in improving service, operations, and facilities. PRIIA focuses on inter-city passenger rail, including Amtrak's long-distance routes and the Northeast Corridor (NEC), state-sponsored corridors throughout the Nation, and the development of high-speed rail corridors.

4.15.2.2 State Regulations

California Department of Transportation

Caltrans maintains the state highway system, including U.S. Highway 101, State Route 166, and State Route 1, which provide access to collector, access, and local roads in the SMR area. Caltrans generally regulates maximum load limits for trucks and safety requirements for oversized vehicles for operation on highways.

California Public Utilities Commission

The California Public Utilities Commission (CPUC) is the state agency charged with ensuring the safety of freight railroads, inter-city and commuter railroads, and highway-railroad crossings in

the State of California. CPUC performs these railroad safety responsibilities through the Railroad Operations and Safety Branch (ROSB) of the Safety & Enforcement Division.

ROSB's mission is to ensure that California communities and railroad employees are protected from unsafe practices on freight and passenger railroads by enforcing rail safety rules, regulations, and inspection efforts; and by carrying out proactive assessments of potential risks before they create dangerous conditions. ROSB personnel investigate rail accidents and safety related complaints, and recommend safety improvements to the CPUC, railroads, and the federal government as appropriate.

The Public Utilities Code requires the CPUC to conduct focused inspections and regular inspections of all railroad and light rail transit operations in the State. The Public Utilities Code also requires the CPUC to conduct investigations of all rail accidents occurring within the State resulting in loss of life or injury to person or property. These investigations are conducted alongside the National Transportation Safety Board. The California Local Community Rail Security Act of 2006 requires every operator of rail facilities in the State to submit a risk assessment to the CPUC and the California Emergency Management Agency (CEMA) that identifies potential hazards and emergency response procedures. The Act also requires rail operators to develop and implement an infrastructure protection program, updated annually, to protect their rail facilities from acts of sabotage, terrorism, or other crimes (Caltrans 2013).

California Office of Planning and Research, California Environmental Quality Act

Creating new metrics for transportation analysis was one of the main goals of SB 743. It was signed with the intent to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions” and required the OPR to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA (as detailed in Section 15064.3[b]). Beginning July 1, 2020, the newly adopted VMT criteria for determining significance of transportation impacts was implemented statewide.

SB 743 modifications, which are now in effect, change the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change replaces LOS with VMT and provides a review of land use and transportation projects that will help reduce future VMT growth. In October 2020, the County published Transportation Impact Analysis Guidelines that focus on VMT.

Collision Analysis

Statewide Integrated Traffic Records System

This database provides detailed information about collisions that have been reported by the local police department. Collisions for all vehicles were evaluated from 2018 through 2022 at the intersection and links within the study area.

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There were 11 collisions reported on State Route 1 (Willow Road) within 0.3 miles of the Project driveway. Two were fatal, one was reported as severe injury, six collisions had visible injuries, and two collisions had complaints of pain. Of these reported collisions, three were head-on, two were rear end, one was broadside, one was a collision with a fixed object, three vehicles overturned, and one collision was between a vehicle and pedestrian.

Traffic Accident Surveillance and Analysis System (TASAS)

Table 4.15.2 shows the collisions reported within 250 feet of the Project driveway and compares the actual collision rates to average collision rates for similar facilities. The Project driveway's fatal and injury collision rates are well below the statewide average for similar facilities, as are the total collision rates.

Table 4.15.2 TASAS Collision Rate Summary

PM	Intersection Description	No. of Collisions ⁽³⁾			Actual Collision Rate (per million vehicles)			Average Collision Rate (per million vehicles)		
		F	I	Total ⁽¹⁾	F	F+I	Total ⁽¹⁾	F	F+I	Total ⁽¹⁾
6.392	SR 1 at Santa Maria Refinery	0	2	4	0.00 ⁽²⁾	0.14 ⁽²⁾	0.29 ⁽²⁾	0.015 ⁽²⁾	0.30 ⁽²⁾	0.65 ⁽²⁾

Notes: Total collisions shown include Property Damage Only (PDO). Actual and Average collision rates have been adjusted to reflect spot locations for segments less than 0.5 miles. Collisions rates are from 10/1/2017 to 9/30/2022. Source: Caltrans 2023

4.15.2.3 Local Regulations

San Luis Obispo Council of Governments

SLOCOG is a joint powers authority with a goal of facilitating cooperative regional and subregional planning, coordination, and technical assistance on issues of mutual concern. SLOCOG is the designated Regional Transportation Planning Agency and thereby responsible for all regional transportation planning and programming activities, including developing the RTP. The RTP guides transportation policy and is updated every five years. The 2023 RTP describes the County's long-term transportation and sustainability plan; it applies future transportation and housing needs to current legislation, both in terms of land use and greenhouse gas emissions (SLOCOG 2023).

The SLOCOG 2023 RTP establishes the following vision for the County's transportation system: "A fully integrated, intermodal, transportation system that facilitates the safe and efficient movement of people, goods, and information within and through the region." The RTP chose individual pillars to support this overarching vision, and the goals outlined align with state and federal transportation planning regulations. The following list provides the pillars, goals, and policies that will go into improving the transportation system.

- **Infrastructure:** Maintain and improve the efficiency of the existing transportation system. Employ low-cost solutions to transportation demand management and increase infrastructure resiliency to the environment.

- **Mobility:** Improve intermodal mobility and accessibility for all people. Provide reliable, flexible travel choices between modes and improve accessibility to housing, jobs, and services.
- **Economy:** Support a vibrant, resilient economy. Support transportation investments to enhance economic activity and tourism, improve the freight network across the nation, and support equitable, sustained economic growth.
- **Safety:** Improve public safety and security. Reduce fatalities, serious injuries, and congestion on the transportation system. Improve emergency preparedness, response, and recovery on the system.
- **Healthy communities:** Foster livable and healthy communities and promote equity. Expand access to healthy transportation options, increase supply and variety of housing, jobs, and basic services to reduce trips and travel distances, and reduce transportation burdens for underserved communities.
- **Environment:** Protect and enhance the environment. Conserve natural, sensitive resources, preserve historic, cultural, and aesthetic resources. Improve air quality and greenhouse gas emissions from transportation.
- **Fiscal responsibility:** Invest strategically to optimize the transportation system, continual involvement by all stakeholders, and seek sustainable, competitive funding to maintain and improve the existing system.

In addition to highway and road goals, the RTP outlines rail-oriented strategies to improve the existing transportation network. These are provided below.

- Increase the frequency, reliability, and convenience of inter-city passenger rail services and the amenities needed for comfortable and convenient travel.
- Continue to support acquisition of sufficient equipment and construction of necessary improvements to offer services between San Francisco and Los Angeles along and through the Coast Route.
- Support efforts to maintain or expand the level of railroad passenger service, the acquisition of rolling stock and the rehabilitation/upgrade of railways along the Coast Route between Los Angeles and San Jose.
- Minimize street, road and highway conflicts with railroad facilities by encouraging grade separated crossings, safety gates, and closing at-grade facilities where possible and discouraging intensification of vehicles at existing at-grade facilities.
- Do not support the establishment of any additional at-grade rail crossings.
- Support capital improvement projects that improve safety for pedestrians and bicyclists at uncontrolled crossing points along the rail line including the construction of pedestrian and bicycle bridges in high conflict areas.
- Construct rail transportation facilities to accommodate projected growth, including: additional rail layover facilities; industrial spurs where appropriate; and station improvements where needed.

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- Continue to facilitate rail improvements with other transportation agencies in the Coast Rail Coordinating Council along the Coast Route Rail Line to ensure the continuation and improvement of passenger rail services.
- Identify, prioritize, and program major improvements as identified in the California's Passenger Rail System.
- Support additional federal and state funding for inter-city rail and capital operating costs, including trackage, other signal improvements and grade crossing improvements.
- Encourage no idling zones (and "Quiet Zones") for locomotives near residential neighborhoods and facilitate a reduction of rail transportation conflicts with other land uses.
- Support capital improvements that facilitate "higher," (i.e., 79–125 mph) speed rail service on the corridor, including; installation of centralized and improved traffic signal control, curve realignments, double-tracking, extension of existing and new passing sidings, grade improvements, on-time performance payments, positive train control and new train technologies.

County of San Luis Obispo General Plan

The Circulation Element, which is part of the Land Use Element in the County General Plan, includes the following goals and objectives (County 2021a):

- Provide a land use pattern and rate of population growth that will not exceed the financial ability of the county and its residents to expand and maintain the circulation system;
- Plan transportation system improvements to provide for, but not exceed, the demand of visitors and permanent residents. These improvements should be consistent with the land use patterns allowed by both the land use element and the cities' general plans, so that growth is not facilitated or induced in inappropriate amounts or locations;
- Coordinate the transportation systems between different modes of travel, sensitive to the needs and desires of citizens in a manner that will provide an optimum benefit for the investment of public funds;
- Recognize public transit and carpooling as very important components of the county's strategy to provide adequate circulation and to reduce dependency on the automobile;
- Develop and coordinate transportation programs that reinforce federal, state, regional and local agency goals;
- Design a transportation system that provides safe travel within attainable, feasible economic and technical means;
- Design transportation facilities with the intent to preserve important natural resources and features, promote the aesthetic quality of the region, and minimize environmental changes;

- Develop and enhance a system of scenic roads and highways through areas of scenic beauty without imposing undue restrictions on private property, or unnecessarily restricting the placement of agricultural support facilities;
- Encourage policies for new development to finance adequate additional circulation and access as a result of the increased traffic it will cause; and
- Encourage new development to provide public transit access and pedestrian and bicycle pathways from residential areas to shopping areas, businesses and public facilities.

San Luis Obispo County Code

The County Code implements the General Plan and provides more specific criteria for development. Traffic regulations, including traffic control devices and turning movements, are articulated in the County Code, Title 15, Vehicles and Traffic. Title 23, Coastal Zone Land Use Ordinance, provides standards for proposed developments and new land uses to include parking, street, and frontage requirements. Title 13, Roads and Bridges – Streets and Sidewalks, establishes a road improvement fee to pay for road facilities and improvements related to new development. The County can offer a reimbursement agreement to a developer who constructs a road facility or improvement that exceeds the impact mitigation needs of the new development (County 2024).

4.15.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, traffic impacts would be considered significant if the Project would:

- a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- d. Result in inadequate emergency access.

4.15.4 Impact Assessment Methodology

To ensure a comprehensive analysis, various data sources have been utilized, including the Caltrans, the County, baseline traffic conditions from nearby projects, as well as the SWITRS and the TASAS databases. By estimating VMT and trip generation values based on Project description data, a comparison can be made with baseline conditions to identify potential impacts.

4.15.5 Project-Specific Impacts and Mitigation Measures

This section discusses the impacts and any mitigation measures with the Project related to vehicular and rail transportation.

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Impact #	Impact Description	Residual Impact
TR.1	Thresholds a), b), and d): Would the Project vehicle trips conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, result in inadequate emergency access or increase vehicle miles traveled as per CEQA Guidelines § 15064.3, subdivision (b)?	Class II

The Project would generate demolition traffic, with trucks transporting materials and debris from the site with employees and equipment accessing the site. Trucks would access the site via Willow Road and the U.S. Highway 101/Willow Road interchange. Willow Road is designated as a truck route by the County for the SMR.

As shown in Table 2.1, historical operations of the SMR averaged 37 truck trips per day and 141–199 employees per day. The historical operations generate more truck and employee trips than the Project’s maximum of 83 truck trips per week (less than 20 truck trips per day) and 45 employees per day described in Chapter 2.0, Project Description. The Project trips would also be below the OPR guidance of 110 trips per day (for employees only) (OPR 2018). The Project would be less impactful to roadway traffic operation than historical operations and would reduce VMT, which are roughly proportional to vehicular trips. As Project traffic would be below historical levels, and does not propose any changes to circulation infrastructure, it would also not conflict with ordinances or policies or result in inadequate emergency access. However, the temporal distribution of truck trips could change, potentially impacting traffic operations during peak hours of travel (7:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.). This is a potentially significant impact.

Mitigation Measures

TR.1-1 Construction Traffic Management Plan: Prior to issuance of demolition permits, the Applicant shall develop a Construction Traffic Management Plan for review and approval by County Department of Planning and Building, County Department of Public Works, and Caltrans. The plans shall include at least the following items:

- 1. A scheduling plan showing operational schedules to minimize traffic congestion during peak hours. The plan shall limit Project-related traffic to and from the SMR during the peak AM and PM hours. This plan shall note the schedule for completing various demolition and remediation activities. The plan shall show the hours of operation to minimize traffic congestion during peak hours;*
- 2. Willow Road shall be used for truck deliveries to and from the SMR;*
- 3. Monitoring program for street surface conditions so that damage or debris resulting from construction of the Project can be identified and corrected by the Applicant;*
- 4. A traffic control plan showing proposed temporary traffic control measures, if any; and*
- 5. A delivery schedule for construction materials and equipment.*

Submittal Timing: Prior to County permit issuance. **Approval Trigger:** Issuance of County permit. **Responsible Party:** The Applicant or designee. **What is required:**

Submittal of a Construction Traffic Management Plan. To whom it is submitted and approved by: Caltrans, County Department of Public Works, and County Department of Planning and Building.

Residual Impacts

The preparation and implementation of an adequate construction traffic management plan which would, among other requirements, limit Project-related traffic during peak hours, reducing impact TR.1 to **less than significant with mitigation (Class II)**.

Impact #	Impact Description	Residual Impact
TR.2	Threshold a): Would Project train trips conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Class III

Table 4.15.3 shows that a minimal number of trains would be used during the eight-month aboveground demolition phase. The bulk of the waste would be transported by truck. Rail transportation would be limited to approximately one train (up to three to four rail cars of asbestos) during the duration of the aboveground demolition.

For remediation, impacted soil would be hauled by rail to a waste facility in Utah. As shown in Table 4.15.3, during the remediation phase, a total of 1,520 rail cars per year would be used to transport contaminated soil. This equals approximately 15.8 trains per month and 192 trains a year. To move the total quantity of estimated contaminated soils would take about 1,800 rail cars (assuming five percent by truck), or about 1.3 years at this rate. However, the rate of rail car movement is expected to slow after the peak quarter as remediation efforts decline, with some rail car movement expected at lower rates over a period as long 10 years.

Table 4.15.3 Train Trips Summary

Period	Total Rail Cars	Total Trains	Duration, months	Trains per Month Average
Aboveground demolition	3-4	1	8	< 1
Remediation	1520 per year	192 per year	12	15.8
Historical Trains	416 per year	52 per year	12	4.3
Rail Spur Analysis	NA	250 per year	12	20.8

Notes: Based on 8 cars per train as per Applicant air quality submissions, peak quarter based on Applicant air quality submissions, see Appendix C. Remediation rail cars would continue at the levels above or lower until remediation is completed.

While the Project's impacted soil transport would continue to Utah, the most heavily traveled passenger rail portions of the route are in California, and in particular the Pacific Surfliner and Coast Starlight passenger trains that run along the coastline. A 2013 study by Caltrans concluded that the addition of one passenger train round trip per day and two freight trains per day would not affect the OTP of the Coast Starlight (Caltrans 2013). This finding was consistent with the Phillips 66 Rail Spur Project EIR (County 2015) analysis that found a project that would generate up to 250 trains per year shipping oil products, or about 20.8 trains per month, would not impact the

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OTP of the passenger trains. Although the studies are dated, the OTP of the passenger trains since 2014 has been similar to the OTP in 2023. As stated previously, OTP provides a measure of railroad congestion. Since the Project would generate fewer rail trips than the Rail Spur Project, and only for a temporary period, the Project's impact on public rail transit facilities would be **less than significant (Class III)**.

Impact #	Impact Description	Residual Impact
TR.3	Threshold c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Class III

The Project would not change the arrangement of roadways and would not involve the transportation of over-sized loads or materials. Truck traffic would be similar to historical truck traffic at the SMR. Caltrans data (see Table 4.15.2) indicates that the area of Highway 1 near the SMR experiences lower than average accident rates. The Project would not introduce hazardous design features and would not introduce incompatible uses to the roadways. Therefore, Project impacts on roadway safety would be **less than significant (Class III)**.

4.15.6 Mitigation Measure Impacts to Other Issue Areas

Mitigation measure TR.1-1, Construction Traffic Management Plan, would not generate impacts in other issues areas and would be limited to management of truck traffic.

4.15.7 Cumulative Impacts

The proposed developments in the cumulative project lists (see Chapter 3.0, Cumulative Study Area) would result in minimal impacts on the Project area roadways during the timeframe of the demolition and remediation activities. The most intense traffic generating Project in the area is the Dana Reserve Specific Plan, which is forecast to add fewer than 15 peak hour trips to Highway 1 south of Willow Road at full buildout. Construction of the Dana Reserve development project is planned to occur from 2024–2029, with full buildout occurring after the proposed peak demolition and remediation activities. Although some overlap of the Dana Reserve construction and with the Project would be expected, as the Project would not increase truck traffic over historical levels, the cumulative impact due to demolition and remediation activities for truck traffic would be less than significant.

For the Caballero Battery project, some construction would occur during Project construction, but construction would not be extensive and longer-term operational traffic trips would be minimal and would not generate cumulative impacts.

For the Monarch Dunes project, potential traffic levels would increase in the area due to the hotel, shops and homes. However, as the traffic associated with the Project would not exceed the historical traffic levels from the SMR, and, after construction, traffic levels would decrease, the cumulative impacts would be less than significant.

For the CalTrans and County Public Works traffic improvement projects, all of these projects would be improving the levels of service and operational characteristics of the area transportation network (drainage, etc.) and would therefore not generate long-term cumulative impacts. Short-term delays may occur with some of the projects while in the construction phase that could overlap with the Project construction activities, but as the Project levels of traffic would be equal to or below the historical levels, cumulative impacts would be less than significant.

For rail traffic, the Diablo Canyon Project would generate 83 rail cars over a six-year period (Diablo Canyon DEIR Table 2-7), totaling an average of about one rail car per month, which would be added to trains potentially traveling the same routes as the Project. However, the Diablo Canyon EIR (page 2-81) indicates that railcars “*would be added to scheduled trains with similar destinations*” and would therefore not generate additional train trips. Therefore, the cumulative impact due to demolition and remediation activities for rail traffic would be less than significant.

4.15.8 References

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