PLANNING AND TRAFFIC COMMISSION
Veronica Harvey – Chairperson
Ruben Rivera – Vice Chairperson
Alice Abatti – Commissioner
Rebecca Terrazas-Baxter – Commissioner
Lisa Winkler-Commissioner

AGENDA

PLANNING COMMISSION
TRAFFIC COMMISSION

220 West 9th Street
IMPERIAL, CA 92251

WEDNESDAY, JUNE 12, 2024
6:30 P.M.

The Imperial Planning Commission Meetings, including public comments, are being Livestreamed on the City's social media pages. If attending in person, by remaining in the room, you are giving your permission to be recorded.

1. You are encouraged to observe the City Council meetings via Livestream at the City of Imperial Facebook page.
2. If you are unable to participate in-person, and wish to address the City Council on matters within their jurisdiction, please email public comments to cityclerk@citofimperial.org
3. All documents containing an executive summary and staff recommendation associated with open session action items are made available for public inspection on the City's website, www.cityofimperial.org seventy-two (72) hours prior to the posted meeting time. Government Code Section 54957.5(b)(2)(B).

In compliance with the Americans With Disabilities Act, if you need special assistance to participate in this meeting, please contact (760) 355-4373. Notification 48 hours prior to the meeting will enable the city to make reasonable arrangements to ensure accessibility to this meeting [28cfr 35.102-35.104 ADA title ii]

A. PLANNING AND TRAFFIC COMMISSION CONVENES TO OPEN SESSION AT 6:30 PM:

ROLL CALL
PLEDGE OF ALLEGIANCE
ADJUSTMENTS TO THE AGENDA

B. PUBLIC APPEARANCES

B-1. Matters not appearing on the agenda. If you wish to address the Traffic Commission concerning any item not appearing on the agenda and within the Commission's jurisdiction, please raise your hand and be acknowledged by the Chairperson, and at that time state your name and address for the record. The Chairperson reserves the right to place a time limit on each person's presentation of three (3) minutes. It is requested that longer presentations be submitted to the Commission in writing.

C. PUBLIC HEARING: (DISCUSSION/ACTION-RECOMMEND/DENY):

C-1: Subject: Continued Public Hearing, Discussion/Action: Variance 23-04 and Conditional Use Permit 23-07 for Mark Gaddis to allow the deviation of the Residential Zone Property Development Standards for maximum height and side yard setback requirements for an accessory structure located at 121 North F Street (APN 064-042-0001). The project is categorically exempt from the California Environmental Quality Act (CEQA) under Section 15301-Existing Facilities.

1. **Continued Public Hearing**
2. **Staff Report – Public Comment**
3. **Commission Discussion**

4. **Close Public Hearing**
5. **Recommended Action:** Approve/Deny Resolution No. PC2024-01: A RESOLUTION OF THE PLANNING COMMISSION, OF THE CITY OF IMPERIAL, DENYING APPROVAL OF VARIANCE 23-04 AND CONDITIONAL USE PERMIT 23-07 FOR MARK GADDIS TO ALLOW THE DEVIATION OF THE RESIDENTIAL ZONE'S PROPERTY DEVELOPMENT STANDARDS FOR MAXIMUM HEIGHT AND SIDE YARD SETBACK REQUIREMENTS FOR AN ACCESSORY STRUCTURE LOCATED AT 121 NORTH F STREET (APN 064-042-001).

C-2 Subject: Public Hearing, Discussion/Action: Implementation of a Vehicle Miles Traveled methodology for evaluating transportation impacts under the revised California Environmental Quality Act guidelines as per Senate Bill 743. The project is categorically exempt from the California Environmental Quality Act under Section 15268-Ministerial Projects.

1. **Public Hearing**
2. **Staff Report – Public Comment**
3. **Commission Discussion**
4. **Close Public Hearing**
5. **Recommended Action:** Approve/Deny Resolution No. PC2024-05: A RESOLUTION OF THE PLANNING COMMISSION, OF THE CITY OF IMPERIAL, RECOMMENDING CITY COUNCIL APPROVAL OF THE IMPLEMENTATION OF VEHICLE MILES TRAVELED & CEQA THRESHOLDS STUDY.

D. <u>TRAFFIC COMMISSION NEW BUSINESS: (DISCUSSION/ACTION-RECOMMEND/DENY):</u>

D-1: Discussion/Action: Removal of Pedestrian Crosswalk Located at 400 South Imperial Avenue, between West 4th Street and West 5th Street. This project is categorically exempt from the California Environmental Quality Act under Section 15301 (Class 1) -Existing Facilities.

1. **Staff Report**
2. **Commission Discussion**
3. **Recommended Action:** Approve removal or select appropriate mitigation measure(s) for the crosswalk located at 400 S. South Imperial Avenue.

E. <u>REPORTS:</u>

E-1: Commissioners' Reports

E-2 Staff Reports

F. <u>ADJOURNMENT</u>

F-1. <u>Subject:</u> Adjourn the Planning and Traffic Commission meeting until the next regularly scheduled meeting on June 26, 2024, at 6:30pm.

NOTE: Any documents produced by the City and distributed to a majority of the Traffic Commission regarding any item on this agenda will be made available at the front counter at City Hall, located at 420 South Imperial Avenue, during normal business hours.

Staff Report

Agenda Item No. C-1

To: City of Imperial Planning Commission

From: Yvonne Cordero, Planner

Date: June 4, 2024

Item: Variance 23-04 and Conditional Use Permit 23-07 – Deviation from the Residential Property Development Standards

Applicant:	Mark Gaddis
Project Location:	121 N. F Street
Zoning:	R-1 Single-Family Residential
Environmental:	Categorically Exempt from CEQA – 15301 Existing Facilities
Recommendation:	Staff **does not** recommend Planning Commission approval of Variance 23-04 and Conditional Use Permit 23-07.

Background

Mark Gaddis submitted a Planning Application for the legalization of an existing metal and fabric accessory structure constructed at his residence located at 121 N. F Street. The accessory structure has an overall height of thirteen feet and six inches and was constructed with ten-inch setbacks from the property line. The City of Imperial's

Residential Property Development Standards for Accessory Structures require a setback measurement of three feet and a maximum height of twelve feet for accessory structures.

Mr. Gaddis was paid a courtesy call by our Code Enforcement Division to obtain a building permit for the legalization of his accessory structure. He informed Code Enforcement that the structure had been constructed approximately one year prior to the City's notice. During the building permit review process, staff advised Mr. Gaddis of the structure's height and setback violations and he opted to apply for a variance to deviate from the required setback and height requirements.

The City of Imperial's Development Review Committee reviewed Variance 23-04 and Conditional Use Permit 23-07 and recommend the accessory structure be either removed or modified to comply with the City's Residential Property Development Standards. Upon review of the project, the Development Review Committee requested the Imperial Irrigation District's review of the structure, due to the proximity of IID's power poles and power lines located at the Northwest corner of Mr. Gaddis' property shown in the picture below. IID conducted a site inspection and verified the structure was constructed within IID's Right of Way/Easement and provided their Distribution Line Clearance Specifications detailing the area distances that are to be clear of buildings/structures for 15KV power poles/lines (Attachment B) and Regulation No. 23-Clearance Requirements for Power Line Corridors (Attachment C).



Community Development staff met Mr. Gaddis at his property on February 9, 2024 to verify the structure's measurements. Staff's measurements confirmed that the accessory structure is in violation of IID's Distribution Line Clearances and the City's Property Development Standards. Mr. Gaddis informed staff he submitted an IID Encroachment Permit for permission to encroach within the IID's right of way/easement, but the IID Encroachment Permit was rejected (Attachment D). IID's recommendation is for Mr.

Gaddis to reapply for an Encroachment Permit after modifying the accessory structure to conform with IID's Regulation No. 23 (Attachment C).

The City of Imperial Planning Commission conducted a public hearing for this project on March 27, 2024. The Planning Commission directed Mr. Gaddis to inquire about what other recourse or appeals process was available to him after IID's Encroachment Permit denial. The public hearing was unanimously continued by the Planning Commission pending the information to be provided by Mr. Gaddis at the continued public hearing scheduled for April 24, 2024.

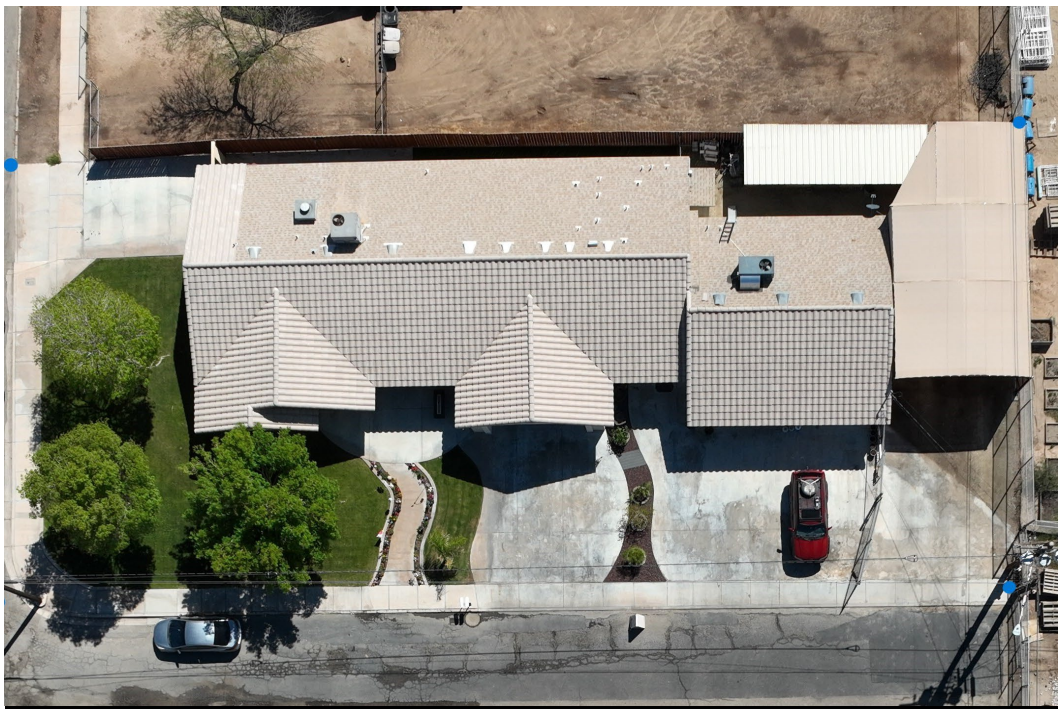
Mr. Gaddis contacted IID's Real Estate Section and IID requested a letter from City staff summarizing the Planning Commission's instructions and he provided staff with the Encroachment Permit rejection email (Attachment D).

At the April 24, 2024, continued public hearing the Planning Commission unanimously voted on giving Mr. Gaddis an additional six weeks to contact IID and obtain a resolution. The public hearing was once again continued to June 12, 2024. Mr. Gaddis provided a project update statement (Exhibit F), indicating IID is formulating a cost sheet to reroute power lines and the power pole located on his property. Staff contacted IID regarding Mr. Gaddis' project update, but have not received any information regarding Mr. Gaddis' project.

Project Location



Aerial View



Required Findings:

In order to approve Variance 23-03, the Planning Commission is required to review six findings per Section 24.19.400 of the City of Imperial's Zoning Ordinance. The findings are listed below, along with the reasons why staff considers that the findings are or are not met in this case. These findings are:

1. **There are special circumstances, such as size topography, location or surroundings applicable to the property or the intended use of the property, and because of this, the strict application of the Zoning Ordinance deprives the property of privileges enjoyed by other properties in the vicinity under identical zoning classification.**

   There are no special circumstances that apply to this property regarding its size, shape or topography that deprive the property of the privileges enjoyed by other properties within the Residential Zone. The subject parcel's size is approximately 9,074 square feet, larger than the minimum lot size of 6,500 square feet in a Residential Zone. The project site's location is adjacent to the Imperial Unified School District's parcel to the West. An Imperial Irrigation District easement with installed power poles is located between the Applicant's and the Imperial Unified School District's property.

2 . The granting of the variance or its modification is necessary for the preservation and enjoyment of a substantial property right possessed by other property in the same vicinity and zone and denied to the property for which the variance is sought.

Although Mr. Gaddis' property right to construct an accessory structure is recognized, the granting of the variance, in its original or modified form, is not necessary to preserve the property owner's right possessed by other residential properties in the vicinity. Permitted accessory structures in Residential Zones comply with the Residential Zone's Property Development Standards by going through the City of Imperial's Community Development's building permit review process or by the approval of a variance.

3. That granting the variance or its modification will not be materially detrimental to the public health, safety or welfare, or injurious to the property or improvements in such vicinity and zone in which the property is located.

The constructed accessory structure does not meet the Residential Zone's Property Development Standards due to the structure exceeding height limitations and deviating from the side yard setback requirements. The fabric and metal accessory structure was constructed on an IID easement that obstructs IID's access, if IID should need to access it. The accessory structure was also constructed within the IID's five-foot clearance required for power poles and distribution lines. The accessory structure presents to be a detriment by impeding the IID's easement access and a fire hazard threatening the safety and welfare of the residential homes and Imperial Unified School District in the vicinity.

4. The variance will not constitute a privilege inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.

The variance will be granting a special privilege within the neighborhood and zone as other residential accessory structures that are reviewed by the City of Imperial's Community Development Department prior to being constructed are only approved when the building plans and inspections comply with the Property Development Standards set forth in Section 24.03.120 of the Residential Zone Ordinance.

5. The granting of this variance does not allow a use or activity which is not otherwise expressly authorized by the zoning regulation governing the parcel of property.

Granting the approval of Variance 23-04 will allow a use unauthorized by the Residential Zone governing the parcel located at 121 N. F Street by deviating from the Residential Property Development Standards set forth in Section 24.03.120.

6. **That granting the variance or its modification will not be incompatible with the City of Imperial General Plan.**

   Granting Variance 23-04 will be incompatible with The City of Imperial's General Plan's Safety Element, Objective 8 that states the City is responsible for minimizing exposure of urban fires and to protect the public to the maximum extent possible. Additionally, the Hazard Management Element's goals and objectives are to contain mitigation measures to protect the public health, safety and welfare.

Environmental:

This project qualifies for a Categorical Exemption according to the California Environmental Quality Act (CEQA), Section 15301, "Existing Facilities", and is determined to be exempt from further environmental review requirements contained in CEQA.

Staff Recommendation:

Staff recommends the Planning Commission conduct a public hearing to receive comments for and against the project. Unless sufficient evidence to the contrary is presented at the public hearing, staff recommends that the Planning Commission **denies approval of** Variance 23-04 to allow the deviation of the required side yard setbacks defined in the City of Imperial's Property Development Standards and obstruction to an IID easement and Conditional Use Permit 23-07 to allow the existing accessory structure with a height that exceeds the City of Imperial's Property Development Standards and violates IID's Distribution Lines Clearance.

Attachments

- Attachment A - DRAFT Resolution PC2024-01 to Deny Approval
- Attachment B – IID Distribution Line Clearance Guidelines
- Attachment C – IID Regulation No. 23
- Attachment D – IID Encroachment Permit Application Rejection Notice
- Attachment E – Applicant's Accessory Structure's Building Plans
- Attachment F – Applicant's project status statement

ATTACHMENT A
***DRAFT* RESOLUTION NO. PC2024-01**

A RESOLUTION OF THE PLANNING COMMISSION, OF THE CITY OF IMPERIAL, DENYING APPROVAL OF VARIANCE 23-04 AND CONDITIONAL USE PERMIT 23-07 FOR MARK GADDIS TO ALLOW THE DEVIATION OF THE RESIDENTIAL ZONE'S PROPERTY DEVELOPMENT STANDARDS FOR MAXIMUM HEIGHT AND SIDE YARD SETBACK REQUIREMENTS FOR AN ACCESSORY STRUCTURE LOCATED AT 121 NORTH F STREET (APN 064-042-001)

WHEREAS, Mark Gaddis submitted a variance request for the deviation of the Residential Zone's Property Development standards for an accessory structure exceeding the maximum height limitations and side yard setback requirements; and

WHEREAS, a duly notified public hearing was held by the Planning Commission during a meeting on March 27, 2024, April 24, 2024 and June 12, 2024; and

WHEREAS, upon hearing and considering all testimony and arguments, analyzing the information submitted by staff and considering any written comment received, the Planning Commission considered all facts relating to the request for Variance 23-04 Conditional Use Permit 23-07.

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of Imperial grants as follows:

A) That the foregoing recitations are true and correct; and

B) The project has been reviewed in accordance with the requirements set forth by the City of Imperial for implementation of the California Environmental Quality Act; and

C) Installation and alteration of the property and deviation from the Residential Zone's Property Development Standards are ministerial and therefore categorically exempt from the California Environmental Quality Act per Section 15301.

D) That based on the evidence presented at the public hearing, the Planning Commission hereby determines that the project is Categorically Exempt under Section 15301 of the California Environmental Quality Act; and

E) That based on the evidence presented at the public hearing, the Planning Commission hereby **DENIES APPROVAL of Variance 23-04 and Conditional Use Permit** for Mark Gaddis to allow for the deviation of the Residential Zone's Property Development Standards for maximum height and side yard setback requirements, based on the following findings:

1. **There are special circumstances, such as size topography, location or surroundings applicable to the property or the intended use of the property, and because of this, the strict application of the Zoning Ordinance deprives the property of privileges enjoyed by other properties in the vicinity under identical zoning classification.**

   There are no special circumstances that apply to this property regarding its size, shape or topography that deprive the property of the privileges enjoyed by other properties within the Residential Zone. The subject parcel's size is approximately 9,074 square feet, larger than the minimum lot size of 6,500 square feet in a Residential Zone. The project site's location is adjacent to the Imperial Unified School District's parcel to the West. An Imperial Irrigation District easement with installed power poles is located between the Applicant's and the Imperial Unified School District's property.

2 . **The granting of the variance or its modification is necessary for the preservation and enjoyment of a substantial property right possessed by other property in the same vicinity and zone and denied to the property for which the variance is sought.**

   Although Mr. Gaddis' property right to construct an accessory structure is recognized, the granting of the variance, in its original or modified form, is not necessary to preserve the property owner's right possessed by other residential properties in the vicinity. Permitted accessory structures in Residential Zones comply with the Residential Zone's Property Development Standards by going through the City of Imperial's Community Development's building permit review process or by the approval of a variance.

3. **That granting the variance or its modification will not be materially detrimental to the public health, safety or welfare, or injurious to the property or improvements in such vicinity and zone in which the property is located.**

   The constructed accessory structure does not meet the Residential Zone's Property Development Standards due to the structure exceeding height limitations and deviating from the side yard setback requirements. The fabric and metal accessory structure was constructed on an IID easement that obstructs IID's access, if IID should need to access it. The accessory structure was also constructed within the IID's five-foot clearance required for power poles and distribution lines. The accessory structure presents to be a detriment by impeding the IID's easement access and a fire hazard threatening the safety and welfare of the residential homes and Imperial Unified School District in the vicinity.

4. **The variance will not constitute a privilege inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.**

   The variance will be granting a special privilege within the neighborhood and zone as other residential accessory structures that are reviewed by the City of Imperial's Community Development Department prior to being constructed are only approved when the building plans and inspections comply with the Property Development Standards set forth in Section 24.03.120 of the Residential Zone Ordinance.

5. **The granting of this variance does not allow a use or activity which is not otherwise expressly authorized by the zoning regulation governing the parcel of property.**

   Granting the approval of Variance 23-04 will allow a use unauthorized by the Residential Zone governing the parcel located at 121 N. F Street by deviating from the Residential Property Development Standards set forth in Section 24.03.120.

6. **That granting the variance or its modification will not be incompatible with the City of Imperial General Plan.**

   Granting Variance 23-04 will be incompatible with The City of Imperial's General Plan's Safety Element, Objective 8 that states the City is responsible for minimizing exposure of urban fires and to protect the public to the maximum extent possible. Additionally, the Hazard Management Element's goals and objectives are to contain mitigation measures to protect the public health, safety and welfare.

F) The City Attorney is authorized to make minor typographical changes to this Resolution that does not change the substance of this Resolution.

PASSED, ADOPTED AND APPROVED by the Planning Commission of the City of Imperial, this 12th day of June, 2023.

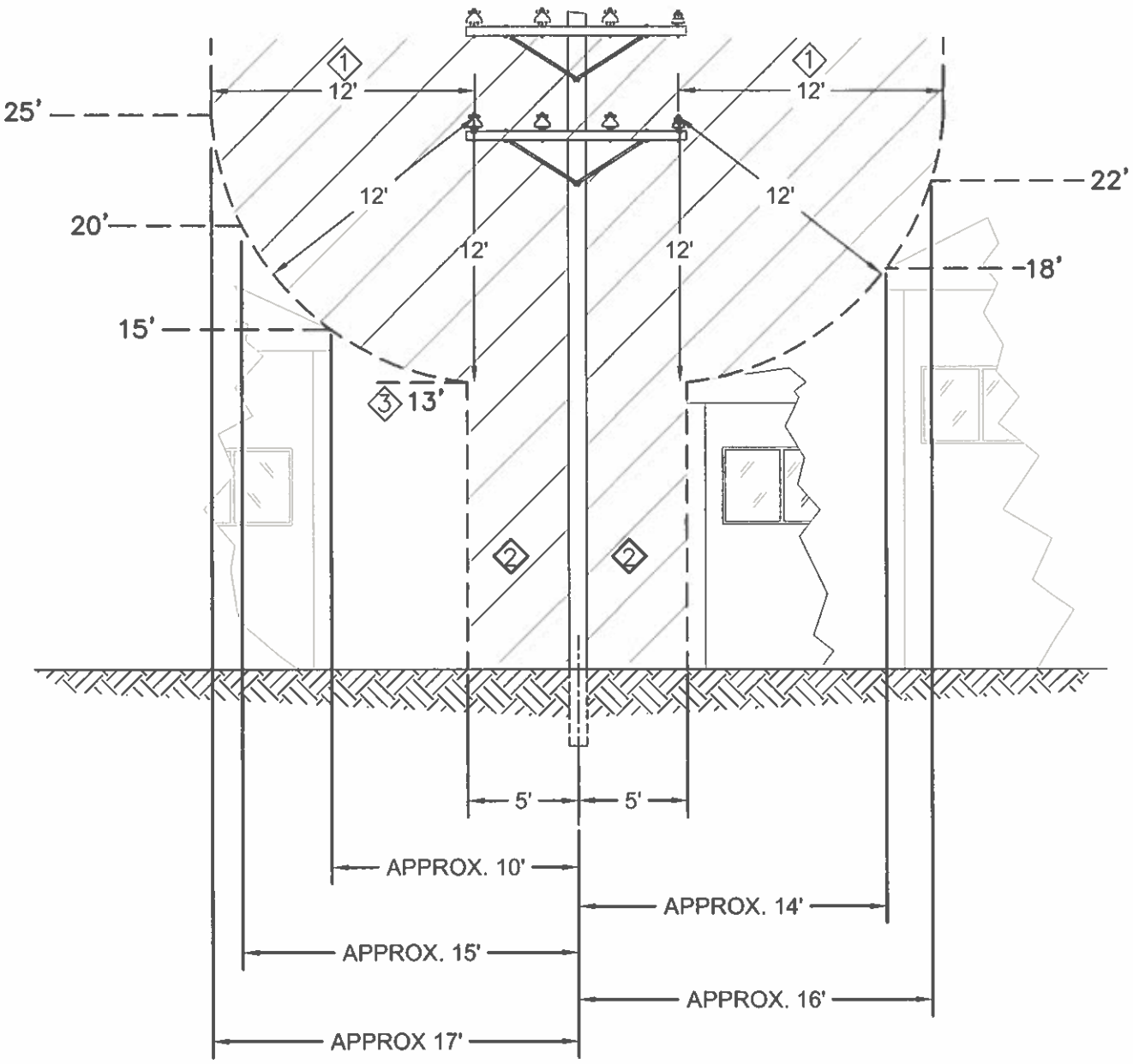
_____
Planning Commission Chairperson

ATTEST:

_____
City Clerk

6.20

AREA TO BE CLEAR OF BUILDINGS



NOTES:

1. BUILDING STRUCTURES TO CONDUCTOR, CLEARANCE TO BE 12 FT. MIN RADIAL FOR 15KV CIRCUITS.
2. CLEARANCE TO BE 5 FT. RADIAL FROM CENTERLINE OF POWER POLE, IID RIGHT OF WAY. NO STRUCTURES ALLOWED IN IID RIGHT OF WAY.
3. BUILDING STRUCTURE TO BE A MAXIMUM HEIGHT OF 13 FT. IF DIRECTLY OUTSIDE OF IID RIGHT OF WAY.
4. CLEARANCES SHOWN ARE FOR DOUBLE CIRCUITS ONLY, FOR SINGLE CIRCUIT CLEARANCES NOTE 1 APPLIES.

IMPERIAL IRRIGATION DISTRICT		
DRAWN BY	JR	EXISTING AND NEW LINE CONDITIONS 15KV DISTRIBUTION BUILDING CLEARANCES
REVIEWED		
APPROVED	MS	
REVISION	REV 01	
DATE	2-11-2013	202.17

REGULATION NO. 23

CLEARANCE REQUIREMENTS FOR POWER LINE CORRIDORS

A. GENERAL PROHIBITION

No person shall cause interference with or pose a threat to the reliability of the District's transmission or distribution lines or create a safety hazard to the public by encroaching upon the District's rights-of-way in violation of the standards set forth herein.

B. PROHIBITED ACTIONS IN DISTRICT RIGHTS-OF-WAY

Within District power line rights-of-way, persons may not:

(1) Build or expand a structure.

(2) Modify power line ground clearance by adding material, storing material, equipment, crops, haystacks or other means, resulting in ground clearance non-conformance to California Public Utilities Commission General Order 95 requirements as set forth in Exhibit A.
(Reference CPUC, General Order No. 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Case No. 4).

(3) Dig, or otherwise undermine power line structures.

(4) Modify drainage or protection berms.

(5) Store or stack wood, earth, waste, debris, materials, crops, machinery, equipment, supplies, haystacks, or similar personalty.

(6) Plant trees, palms or other vegetation with the ability to grow closer than the minimum clearances set forth in Exhibit B.

(7) Ignite fires, burn debris, materials, crops, haystacks.
(Reference California Public Resources Code Section 4293, Mountainous, Forest-Brush- and Grass-Covered Lands).

C. PERSONNEL SAFETY CLEARANCES

(1) No person, firm, corporation, or agent of same, shall require or permit an employee to perform any function in proximity to energized high-voltage lines, to enter upon any land, building, or other premises, and there engage in any excavation, repair, or other operation; or to erect, install, operate, or store, in or upon premises, any tools, machinery, equipment, materials, or structures unless or until danger from accidental contact with said high-voltage lines has been effectively guarded against.

(2) Persons other than qualified line-clearance tree trimmers and trainees shall not approach energized high-voltage power lines closer than as set forth in Exhibit C.
(Reference California Code of Regulations, Title 8, Section 2950, Table 1 Operations).

Board action July 23, 2019

(3) The execution, operation or dismantling of any boom-type lifting or hoisting equipment, or any part thereof, closer than the minimum clearances set forth in Exhibit D, below, shall be prohibited.
(Reference California Title 8, Section 2946, Provisions for Preventing Accidents Due to Proximity to Overhead Lines).

(4) The storage of tools, machinery, equipment, supplies, materials, or apparatus, under, over, or adjacent to energized overhead high-voltage lines, is hereby expressly prohibited, if at any time during the handling or other manipulation it is possible to bring such tools, machinery, equipment, supplies, materials, or apparatus, or any part thereof, closer than the minimum clearances from such lines as set forth in Exhibit D, below.
(Reference California Title 8, Section 2946, Provisions for Preventing Accidents Due to Proximity to Overhead Lines).

D. HAZARDS

Hazards that may fall onto overhead high-voltage lines shall be removed.
(Reference CPUC, General Order No. 95, Section III Requirements for All Lines, Rule 35, Vegetation Management).

E. ENFORCEMENT

The District is hereby authorized to enforce the provisions hereof by all legal and equitable remedies including the discontinuance or refusal of electrical service to the subject property and when deemed necessary and appropriate in order to protect the health and safety of the community or reliability of the energy system, remove the encroachment or obstruction; the cost of such removal to be charged to the property owner. The District shall provide notice to the property owner of intended enforcement actions except where there is an imminent threat to the health or safety of the community or to the reliability of the District's energy systems.

Exhibit A

California Public Utilities Commission, Rules for Overhead Electric Line Construction, General Order No. 95, Section III, Requirements for All Lines, Rule 37 Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Case No. 4 *(excerpt, see Order for additional details)*

Case No.	Nature of Clearance	Span Wires (Other than Trolley Span Wires) Overhead Guys and Messengers	Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 - 750 Volts	Supply Conductors of 0 – 750 Volts and Supply Cables Treated as in Rule 57.8	Supply Conductors and Supply Cables, 750 – 22,500 Volts	Supply Conductors and Supply Cables, 22,500 – 300,000 Volts
4	Above Ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment	15 Feet	15 Feet	19 Feet	25 Feet	30 Feet

Exhibit B

California Public Resources Code, Division 4, Part 2, Chapter 3 Mountainous, Forest-, Brush- and Grass-Covered Lands, Section 4293 *(excerpt, see Code for additional details)*

Clearance in All Directions Between All Vegetation and All Energized Conductors Which Are Carrying Electric Current	
Operating Voltage	**Clearance Distance**
2,400 or more Volts, but less than 72,000 Volts	4 FT
72,000 or more Volts, but less than 110,000 Volts	6 FT
110,000 or more Volts	10 FT

Exhibit C

California Title 8, Group 2, Article 38, Section 2950, Table 1 *(excerpt, see Code for additional details)*

Minimum Approach Distances to Energized Conductors for Persons Other Than Qualified Line Clearance Tree Trimmers and Trainees.	
Nominal Voltage (phase to phase)	**Clearance Distance**
0 to 1,000	10 FT 0 in.
1,100 to 15,000	10 FT 0 in.
15,100 to 36,000	10 FT 0 in.
72,600 to 121,000	12 FT 4 in.
161,000 to 169,000	14 FT 0 in.
230,000 to 242,000	16 FT 5 in.

Exhibit D

California Title 8, Subchapter 5, Group 2, Article 37, Section 2946, Provisions for Preventing Accidents Due to Proximity to Overhead Lines *(excerpt, see Code for additional details)*

Material Storage and Boom-Type Lifting or Hoisting Equipment Required Clearances Required From Energized Overhead High-Voltage Lines	
Nominal Voltage (phase to phase)	**Clearance Distance**
600 to 50,000	10 FT
Over 75,000 to 125,000	13 FT
Over 125,000 to 175,000	15 FT
Over 175,000 to 250,000	17 FT

ATTACHMENT D

From: Nancy Murrieta
To: Yvonne Cordero
Subject: Fw: 121 North F St. Imperial
Date: Tuesday, April 16, 2024 4:04:08 PM
Attachments: VPRealEstateMX6071-S_20240227_105111.pdf

CAUTION: This email originated from outside the City of Imperial. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is the denial I received from the IID, it is the only thing in writing that I have on my end. Please let me know if this is sufficient.

Nancy Murrieta
Office Manager
G/4 Construction
121 North F Street
Imperial, CA 92251
760-355-4332 Office
760-457-5310 Cell

Begin forwarded message:

On Tuesday, February 27, 2024, 9:59 AM, Casillas, Patty <pmcasillas@IID.com> wrote:

> Good morning Nancy:
>
> The Imperial Irrigation District received your encroachment application dated January 25, 2024, for the installation of a carport structure located at 121 North F Street in the city of Imperial. Upon review and performing a site inspection, staff has determined that the carport structure has already been installed. Unfortunately, IID cannot approve the encroachment application and plans submitted based on IID Regulation No. 23, which states, in part:
>
> "B. PROHIBITED ACTIONS IN DISTRICTION RIGHTS-OF-WAY.
> Within District power line rights-of-way, persons may not:
> (1) Build or expand a structure.
> (2) Modify power line ground clearance by adding material, storing material, equipment, crops, haystacks or other means, resulting in ground clearance non-conformance to California Public Utilities Commission General Order 95 requires as set forth in Exhibit A." (A copy of said regulation is attached for your information.)
>
> Based on this, your encroachment application is rejected. However, should you wish to modify your plans for the carport structure to conform with IID's Regulation No. 23, you are welcome to resubmit the plans to this office for further review. Please feel free to contact us if you need further information.

Patty Casillas
Real Estate Section
Imperial Irrigation District
P. O. Box 937
Imperial, California 92251
Phone (760) 339-9381 Cell: (760) 791-4640



From: Nancy Murrieta <g4.construction@yahoo.com>
Sent: Tuesday, February 20, 2024 1:44 PM
To: Casillas, Patty <pmcasillas@IID.com>
Subject: Re: 121 North F St. Imperial

[CAUTION] This email originated from **outside** of the **IID**. Do not reply, click on any links or open any attachments unless you trust the sender and know the content is safe.

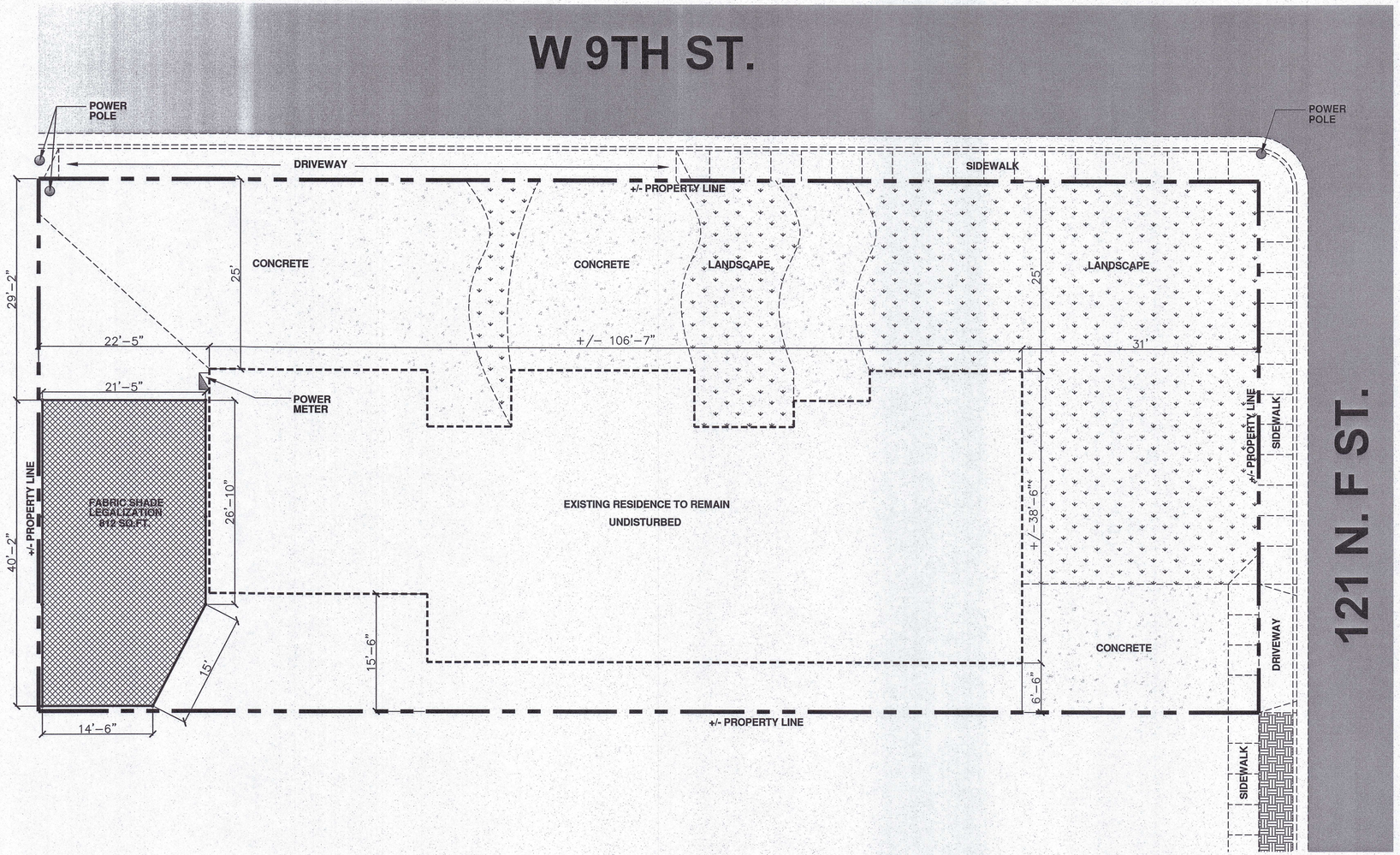
Good afternoon,
Is there an update on the encroachment permit at 121 N F St in Imperial?
Thank you.

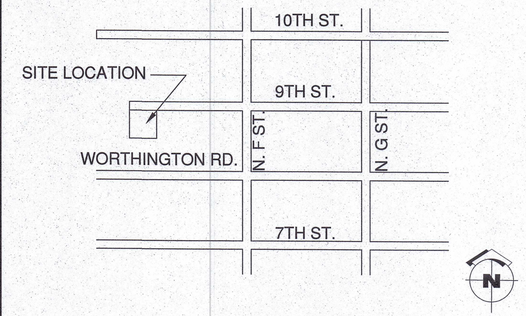
Respectfully,

Nancy Murrieta
Office Manager
G/4 Construction
121 North F Street

MARK GADDIS
121 N. F ST.
FABRIC SHADE LEGALIZATION

APN: 064-042-001





VICINITY MAP

SITE DATA

PROPERTY OWNER: MARK GADDIS

ADDRESS: 121 N. F ST.
IMPERIAL, CA 92251

APN:064-042-001

LEGAL DESCRIPTION:
LOT 7 & N 20 FT OF LOT 8 BLOCK 77

BUILDING DATA

OCCUPANCY CLASSIFICATION: R
DESCRIPTION OF USE: RESIDENTIAL
TYPE OF CONSTRUCTION: TYPE V-B
SPRINKLERS: NO
STORIES: 1
HEIGHT: 9'-0" FT
LIVING SPACE: +/-2,750 SQ. FT
GARAGE AREA: +/-840 SQ. FT

FABRIC SHADE AREA: +/-812 SQ. FT
HEIGHT: 13'-6" FT

DRAWING INDEX

CS _____ SITE PLAN
S.1 _____ FABRIC SHADE

GOVERNING CODES

2022 CALIFORNIA BUILDINGS CODE

SCOPE OF WORK

812 SQ.FT x 13'-6" HIGH FABRIC SHADE TO BE LEGALIZE. FABRIC SHADE CONSTRUCTION WILL ADHERE TO ALL RELEVANT CODES AND REGULATIONS TO ENSURE ITS COMPLIANCE WITH LEGAL REQUIREMENTS.

DISCLAIMER NOTE:
ALL PROPERTY LINES ARE APPROXIMATE. IT IS THE OWNER OR CONTRACTOR RESPONSIBILITY TO HIRE A PROFESSIONAL LAND SURVEYOR TO ESTABLISH PROPERTY LINES PRIOR TO ANY CONSTRUCTION.

REQUIRED SPECIAL INSPECTIONS

N/A

DEFERRED SUBMITTAL

N/A

SITE PLAN

SCALE: 1/8" = 1'-0"

DRAWING STATUS:
- ☐ PRELIMINARY DRAWINGS
- ☐ PROGRESS DRAWINGS
- ☒ PLAN CHECK/PERMIT DRAWINGS
- ☐ CONSTRUCTION DOCUMENTS

CALL BEFORE YOU DIG
UNDERGROUND SERVICE ALERT
CALL: TOLL FREE
1-800
422-4133
TWO WORKING DAYS BEFORE YOU DIG

FERRER Group LLC
760-601-4667
rbgferrer@gmail.com
1065 West State Ave., El Centro CA 92243

REVISIONS

No.	DESCRIPTION

SHEET: CS

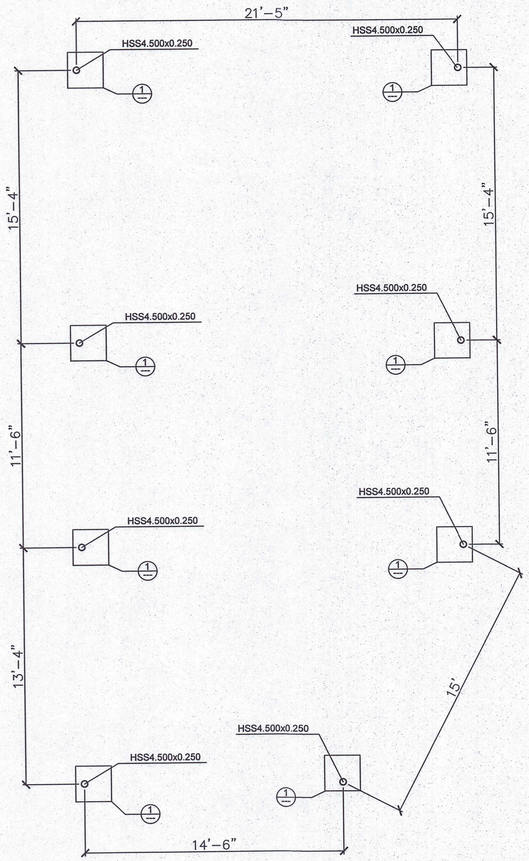
DESCRIPTION: SITE PLAN

BY: JFT | 10/03/2023

PROJECT ADDRESS: 121 N. F ST. IMPERIAL, CA 92251

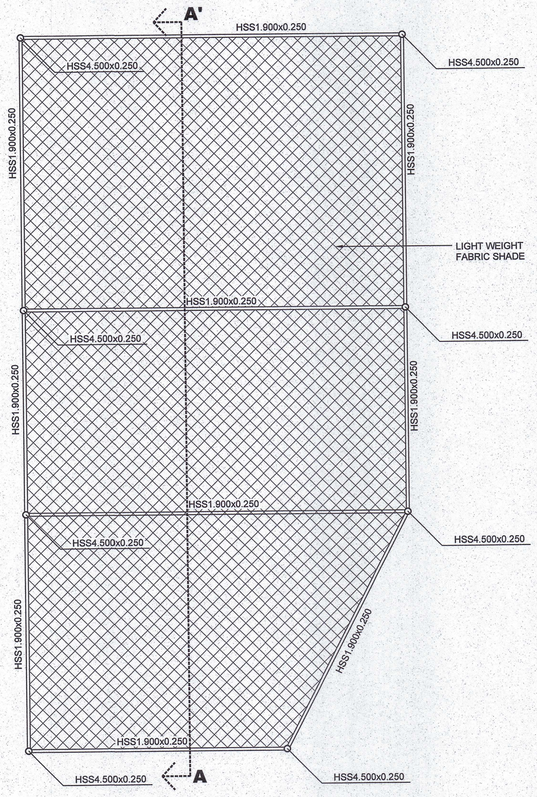
JOB NUMBER: 2023-101

CLIENT: MARK GADDIS



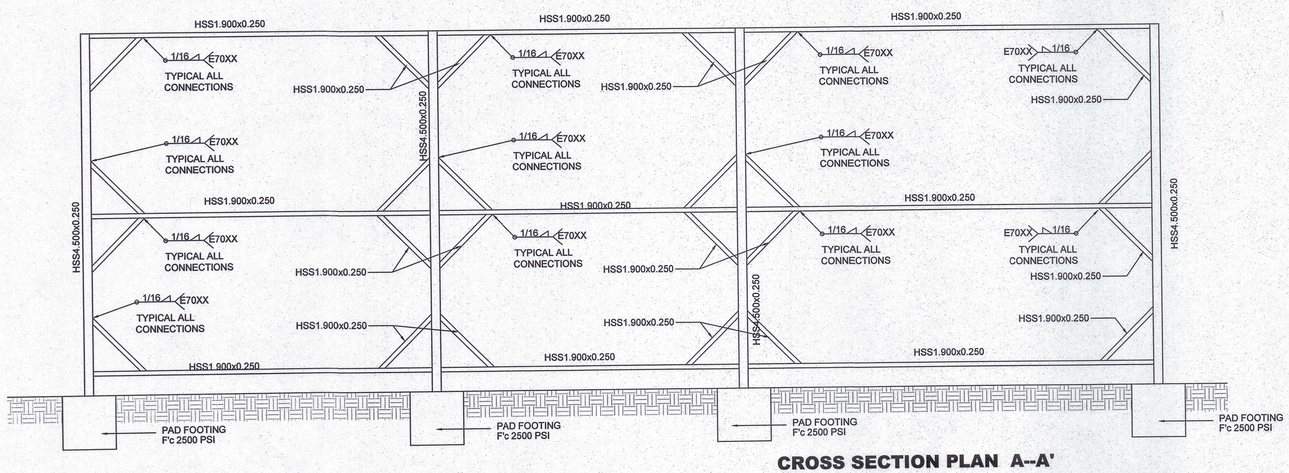
FOUNDATION PLAN

SCALE 1/4" = 1'-0"



FRAMING PLAN

SCALE 1/4" = 1'-0"



CROSS SECTION PLAN A--A'

SCALE 1/4" = 1'-0"

PROJECT SHALL COMPLY WITH THE FOLLOWING CODES:

2022 CALIFORNIA BUILDING CODE
2021 INTERNATIONAL BUILDING CODE

THE STRUCTURE WILL BE LOCATED ENTIRELY ON NATIVE/UNDISTURBED SOIL

DESIGN LOADS:	
ROOF DEAD LOAD	1 PSF
ROOF LIVE LOAD	5 PSF

SEISMIC PARAMETERS	
Ss	1.598
S1	0.657
SDs	1.065
SD1	0.657
Fa	1.000
Fv	1.500
SITE CLASS	D

WIND	
BASIC WIND SPEED	98 M.P.H.
WIND IMPORTANCE FACTOR	1.00
WIND BUILDING CATEGORY	II
WIND EXPOSURE	C
DESIGN WIND PRESSURE	16 PSF

REINFORCED CONCRETE NOTES:

1.- THE MINIMUM 28-DAY CYLINDER STRENGTH SHALL BE AS FOLLOWS, U.N.O.

CONCRETE ELEMENT	F'c
SLAB ON GRADE	2500 PSI
CONTINUOUS FOOTING	2500 PSI
SPREAD/PAD FOOTINGS	2500 PSI

ALL CONCRETE REQUIRED TO BE MORE THAN 2500 PSI SHALL HAVE SPECIAL INSPECTION PER 2021 IBC 1705.3.

1.1.- PORTLAND CEMENT SHALL CONFORM TO ASTM C 150, TYPE I OR II

STRUCTURAL STEEL NOTES:

2.1 STRUCTURAL STEEL DESIGN, FABRICATION AND ERECTION SHALL CONFORM TO THE LATEST AISC SPECIFICATIONS.

2.2 ALL STRUCTURAL STEEL INCLUDING NUTS, AND BOLTS SHALL BE GALVANIZED COAT.

2.3 MATERIAL SPECIFICATIONS UNLESS NOTED OTHERWISE:
- A. STRUCTURAL SHAPES & PLATES- - - - -ASTM A36
- B. PIPE COLUMNS- - - - - - - - - - ASTM A53, GRADE B
- C. STEEL TUBES- - - - - - - - - - - ASTM A501
- D. HIGH STRENGTH BOLTS- - - - - - - -ASTM A325

2.4 ALL BOLTS SHALL BE 3/4"Ø A325-SC BOLTS, UNLESS NOTED OTHERWISE.

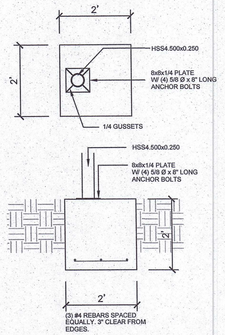
2.5 WELDING OF STRUCTURAL SHAPES AND PLATES SHALL BE IN CONFORMANCE WITH THE LATEST AMERICAN WELDING SOCIETY SPECIFICATION D1.1.

2.6 ALL WELDING SHALL BE PERFORMED BY LICENSED WELDERS.

THE ENGINEER SHALL NOT BE RESPONSIBLE FOR CONSTRUCTION MEANS, METHODS, TECHNIQUES, SEQUENCES, PROCEDURES OR FOR SAFETY PRECAUTIONS AND PROGRAMS OR FOR THE CONTRACTOR'S FAILURE TO PERFORM THE WORK IN ACCORDANCE WITH THE CONTRACT DOCUMENTS.

THESE DRAWINGS ARE NOT TO BE SCALED FOR DIMENSIONAL INFORMATION. ACTUAL DIMENSION NUMBERS SHOWN ON THE PLANS ARE TO BE USED. IF DIMENSIONAL CONFLICTS EXIST, NOTIFY THE ENGINEER IMMEDIATELY. ANY CONTRACTOR SCALING DRAWINGS FOR ANY PURPOSE DOES SO AT HIS OWN RISK AND IS RESPONSIBLE FOR ANY ERRORS AND MISTAKES WHICH MAY RESULT.

**THE FABRIC PROVIDED BY OTHER SHALL SHALL BE TREATED WITH FLAME-RETARDANT MATERIAL REGISTERED AND APPROVED BY THE STATE OF CALIFORNIA FIRE MARSHALL.
THE ARTICLE MEETS THE NFPA-701-2010 FLAME RETARDANT STANDARD.**



1 SCALE 1/2" = 1'-0"

DRAWING STATUS:
- ☐ PRELIMINARY DRAWINGS
- ☐ PROGRESS DRAWINGS
- ☒ PLAN CHECK/PERMIT DRAWINGS
- ☐ CONSTRUCTION DOCUMENTS

CALL BEFORE YOU DIG
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TWO WORKING DAYS BEFORE YOU DIG

FERRER Group LLC
760-601-4667
ingferrer@gmail.com
1065 West State Ave., El Centro CA 92243

PREPARED UNDER THE DIRECTION OF:
VICTOR RODRIGUEZ-FERNANDEZ
10/02/2023
DATE

SEAL: REGISTERED PROFESSIONAL ENGINEER — VICTOR RODRIGUEZ-FERNANDEZ — No. C-35373 — CIVIL — STATE OF CALIFORNIA

REVISIONS

No.	DESCRIPTION

FABRIC SHADE

BY: SCR | 09/27/2023 | PROJECT ADDRESS: 121 N. F ST.
JOB NUMBER: 2023-143 | CLIENT: MARK GADDIS

SHEET: S.1

G4 Construction

121 North F Street Imperial, Ca. 92251
(760) 355-4332 – Phone / Fax
mark.gaddis@ymail.com
Lic. #571225

May 29, 2024

Re: Carport located at 121 North F St. Imperial CA, 92251

I met with IID on site and the IID is currently working on a cost sheet. That cost sheet is to route the power lines around the carport since the last power pole on that specific line is just to the south of the carport. By re-routing the wires, the conflict with the IID are then eliminated. I will update the City of Imperial with any new information as soon as it is available.

_____
Mark Gaddis

staff report

Agenda Item No. C-2

To: City of Imperial Planning Commission

From: Othon Mora, Community Development Director

Date: June 4, 2024

Item: Vehicle Miles Traveled (VMT) and CEQA Thresholds Study

Environmental: Categorically Exempt per Section 15268 for Ministerial Projects

Recommendation: Recommend City Council Approval of Vehicle Miles Traveled (VMT) and CEQA Thresholds Study

Background

The City of Imperial is implementing a Vehicle Miles Traveled (VMT) methodology for evaluating transportation impacts under the revised California Environmental Quality Act (CEQA) guidelines as per Senate Bill 743 (SB 743). This VMT-based methodology replaces the previous Level of Service (LOS) methodology, shifting the focus from congestion-based impacts to the environmental impacts of vehicle trip lengths. The project involves the adoption of the VMT and CEQA Thresholds Study, which will serve as a guideline for analyzing the transportation impacts of various land development and planning projects within the city.

Following the passage of SB 743, the CEQA Guidelines were amended to emphasize the reduction of greenhouse gas (GHG) emissions by changing the way transportation impacts are measured. The City of Imperial has developed a comprehensive VMT methodology to evaluate these impacts effectively. This methodology includes analyzing VMT per service population, residential home-based VMT per capita, employment home-based work VMT per employee, and total VMT for both trucks and automobiles.

The City's new guidelines incorporate screening criteria that can exempt certain projects from detailed VMT analysis if they generate low VMT, are located in low-VMT areas, or are in transit priority areas. Additionally, the guidelines outline requirements for projects that generate significant VMT and provide mitigation measures to reduce these impacts.

Environmental Determination

The Vehicle Miles Traveled (VMT) and CEQA Thresholds Study is categorically exempt from CEQA under Section 15268, which pertains to ministerial projects. The study itself does not have a direct physical impact on the environment, but provides a framework for assessing future projects' transportation impacts. Any future projects will be individually assessed under CEQA, with this study guiding their VMT analysis.

Public Notification

The public hearing scheduled for June 12, 2024, was duly noticed in the Holtville Tribune and Calexico Chronicle, newspapers of general circulation, on May 30, 2024.

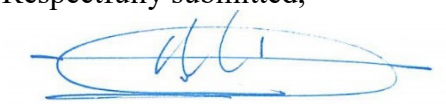
Recommendation

Staff recommends that the Planning Commission recommend approval of the Vehicle Miles Traveled (VMT) and CEQA Thresholds Study to the City Council. The adoption of this study will ensure that the City of Imperial complies with state requirements while effectively addressing transportation impacts and contributing to the reduction of greenhouse gas emissions.

Attachments

- Vehicle Miles Traveled (VMT) and CEQA Thresholds Study
- Resolution PC2024-05

Respectfully submitted,



Othon Mora
Community Development Director

RESOLUTION PC2024-05

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF IMPERIAL RECOMMENDING CITY COUNCIL APPROVAL OF THE 2023 IMPLEMENTATION OF VEHICLE MILES TRAVELED & CEQA THRESHOLDS STUDY

WHEREAS, Senate Bill 743, enacted in 2013 and codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the criteria for determining the significance of transportation impacts of projects; and

WHEREAS, in 2018, the Governor's Office of Planning and Research proposed, and the California Natural Resources Agency certified and adopted, new CEQA Guidelines section 15064.3 that identifies vehicle miles traveled (VMT), or the amount and distance of automobile travel attributable to a project, as the most appropriate metric to evaluate a project's transportation impacts; and

WHEREAS, the 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study has been prepared to assess the transportation impacts of proposed projects within the City of Imperial; and

WHEREAS, the City of Imperial is committed to reducing greenhouse gas emissions and promoting sustainable transportation practices in accordance with state law and local policies; and

WHEREAS, the 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study provides a detailed analysis of the anticipated travel patterns and transportation impacts associated with proposed developments; and

WHEREAS, a duly notified public hearing was published on May 30, 2024, in a local paper of general circulation, indicating the date and time of the public hearing in compliance with state law; and

WHEREAS, a public hearing was held by the Planning Commission on June 12, 2024, to hear testimony for and against the findings of the 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study; and

WHEREAS, upon hearing and considering all testimony and arguments, analyzing the information submitted by staff, and considering any written comments received, the Planning Commission considered all facts relating to the 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study; and

WHEREAS, the proposed Vehicle Miles Traveled (VMT) & CEQA Thresholds Study is found to be exempt from the California Environmental Quality Act (CEQA) under Section 15268 for Ministerial Projects**.**

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of Imperial as follows:

A) That the foregoing recitations are true and correct; and

B) The 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study has been reviewed in accordance with the requirements set forth by the City of Imperial; and

C) The Vehicle Miles Traveled (VMT) & CEQA Thresholds Study are found to be exempt from CEQA under Section 15268 for Ministerial Projects; and

D) That based on the evidence presented at the public hearing, the Planning Commission hereby **RECOMMENDS APPROVAL TO THE CITY COUNCIL** of the 2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds Study and its findings on June 12, 2024.

E) The City Attorney is authorized to make minor typographical changes to this Resolution that does not change the substance of this Resolution;

PASSED, ADOPTED AND APPROVED by the Planning Commission of the City of Imperial, this 12th day of June, 2024.

_____
Planning Commission Chairperson

ATTEST:

_____
City Clerk



2023 Implementation of Vehicle Miles Traveled (VMT) & CEQA Thresholds

PREPARED FOR:



CITY OF IMPERIAL
Community Development Department
400 South Imperial Avenue, Suite 101
Imperial, CA 92251

PREPARED BY:



MINAGAR & ASSOCIATES, INC.
ITS – Traffic/Civil/Electrical Engineering – Transportation Planning – Homeland Security – CEM
23282 Mill Creek Drive, East Tower, East Tower, Suite 120
Laguna Hills, CA 92653

MAY 9, 2024

2023 IMPLEMENTATION OF VEHICLE MILES TRAVELED (VMT) & CEQA THRESHOLDS

for the

CITY OF IMPERIAL

Community Development Department

PREPARED FOR:

CITY OF IMPERIAL
Community Development Department
400 South Imperial Avenue, Suite 101
Imperial, CA 92251

PREPARED BY:

MINAGAR & ASSOCIATES, INC.
Traffic/Civil/Electrical Engineering - ITS - Transportation Planning
23282 Mill Creek Drive, East Tower, Suite 120
Laguna Hills, CA 92653
Tel: (949) 707-1199

May 9, 2024

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LIST OF APPENDICES

Appendix A: Transportation Projects That Do Not Require VMT Analysis
Appendix B: VMT Mitigation Measures
Appendix C: Project Information Form (PIF)

1.0 – Introduction

Following the passage of Senate Bill 743 (SB 743), which created the 2019 amendments to the California Environmental Quality Act (CEQA) Guidelines by the Natural Resources Agency, the City of Imperial is now developing a **Vehicle Miles Traveled (VMT)** based methodology for evaluating transportation impacts under the revised CEQA guidelines.

The City of Imperial will utilize this VMT methodology for various projects (e.g., Land Development, Planning, etc.) by analyzing the VMT per service population, residential home-based VMT per capita, employment home-based work VMT per employee, as well as truck VMT and total VMT (including trucks and automobiles).

This report has been prepared to provide guidance to consultants on how to prepare Vehicle Miles Traveled (VMT) Analyses in the City of Imperial. VMT Analyses are intended to identify potential VMT impact of a proposed development project and determine the need for any improvements or mitigations to the project or nearby road system. Though this report focuses primarily on VMT methodology, a section on **Local Mobility Assessment Analysis (LMA)** guidelines has also been provided.

1.1 – Background

The primary purpose of SB 743 was to change the primary methodology of Environmental Traffic Impact Analysis to revolve around the metric of VMT indexed to population and / or employment, as opposed to the previous methodology focusing on Level of Service (LOS), which was based on delay or capacity. By switching from LOS to VMT, the analysis shifts from analyzing the environmental impact of congested streets and / or intersections to the impact of vehicle trip lengths. This methodology was developed to aid in reaching the Greenhouse Gas (GHG) emission goals passed in the California Global Warming Solutions Act of 2006 (Assembly Bill 32 or AB 32).

In addition to the VMT metric, the City of Imperial will continue to utilize LOS analysis methodology in the Local Mobility Analysis for all projects to ensure the safety and efficient of City roadways.

CEQA – refers to the California Environmental Quality Act. This act requires identification of any significant environmental impacts of state or local action, including discretionary approval of new development or infrastructure projects. The process of identifying these impacts is typically referred to as the environmental review process.

VMT – refers to "Vehicle Miles Traveled", a metric that accounts for the number of vehicle trips generated and the length or distance of those trips.

LOS – refers to "Level of Service", a metric that assigns a letter grade to network performance. The typical application of LOS in cities is to measure the average amount of delay (in seconds) experienced by vehicle drivers at an intersection during the most congested time of day and to assign an LOS from A to F.

1.2 – Existing City Conditions

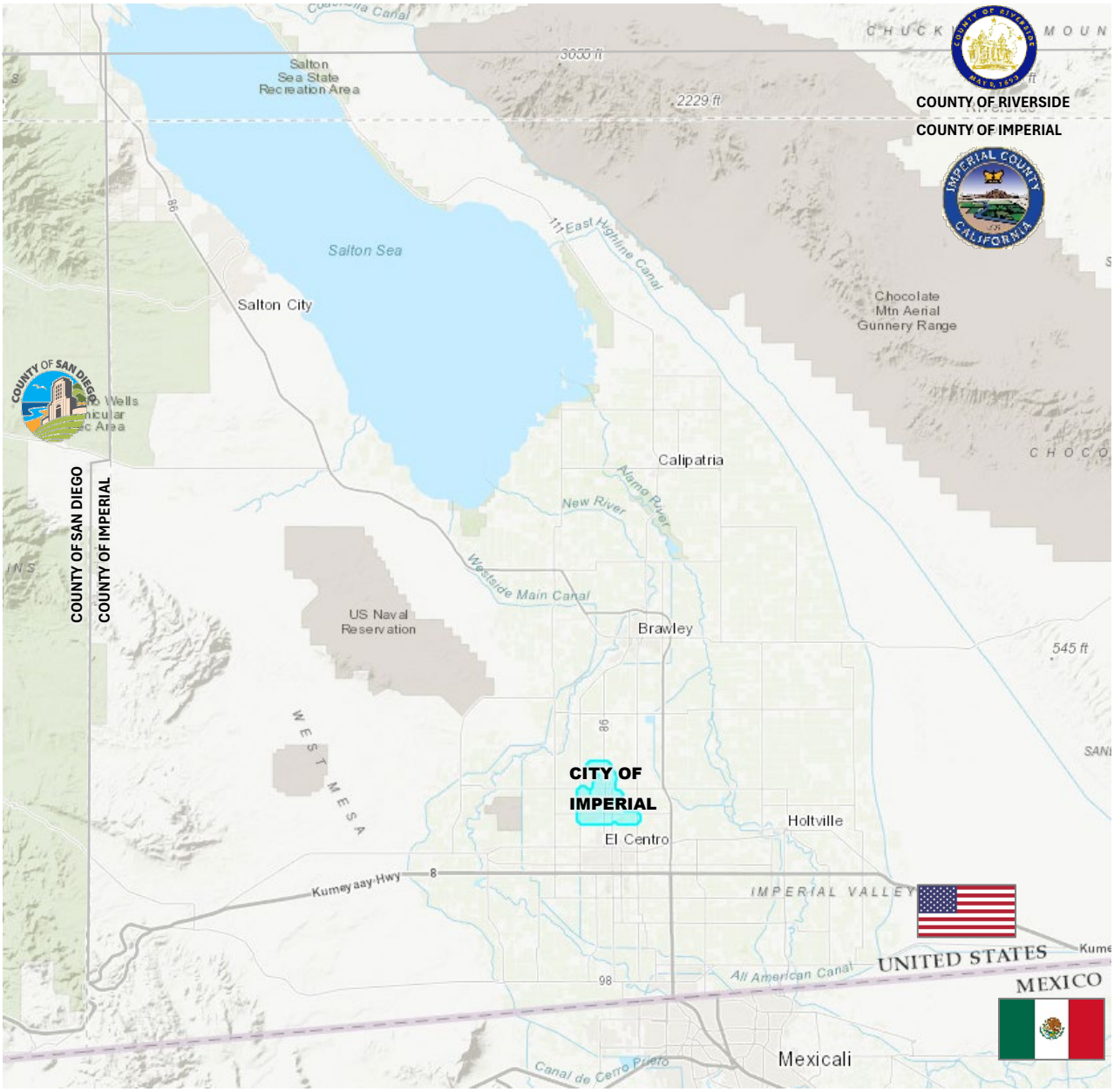
As the VMT of a project is heavily influenced by the location, size, and land use mix, the Zoning Map for the City of Imperial is shown in ***Figure 2***. Factors such as shopping, school, recreational, housing, and employment availability affect

whether the City population and nearby regions will be using the project as an alternative to a farther facility (decreasing VMT), serving populaces that generate higher/lower VMT, etc.

California State Route 86 (SR 86) is the only principal arterial/major highway that passes through the City of Imperial. SR 86 is a north-south state highway connecting the Imperial and Coachella valleys, beginning at State Route 111 south of the Cities of Imperial and El Centro.

The City's Circulation Element of the General Plan (June 2017) prefers to utilize classification of street typologies rather than roadway classifications, as it better addresses pedestrian, transit, and bicycle traffic in addition to vehicle traffic. However, in the preparation of a VMT Analysis, which primarily considers vehicle traffic, roadway classifications will be used rather than typologies. Nevertheless, to provide a comprehensive understanding of a development site's surroundings and conditions, the City of Imperial's existing and proposed bikeways are shown in ***Figure 3***. Roadway classifications in the City are provided in ***Figure 4.***

Typical street cross-sections have been incorporated from Imperial County's *Engineering Design Guidelines Manual for the Preparation and Checking of Street Improvement, Drainage and Grading Plans Within Imperial County* (Sept 2008) for these VMT guidelines. These cross-sections are shown in ***Figures 5.1-5.3***.



LEGEND

City Limits

N

Figure 1: City of Imperial Regional Map

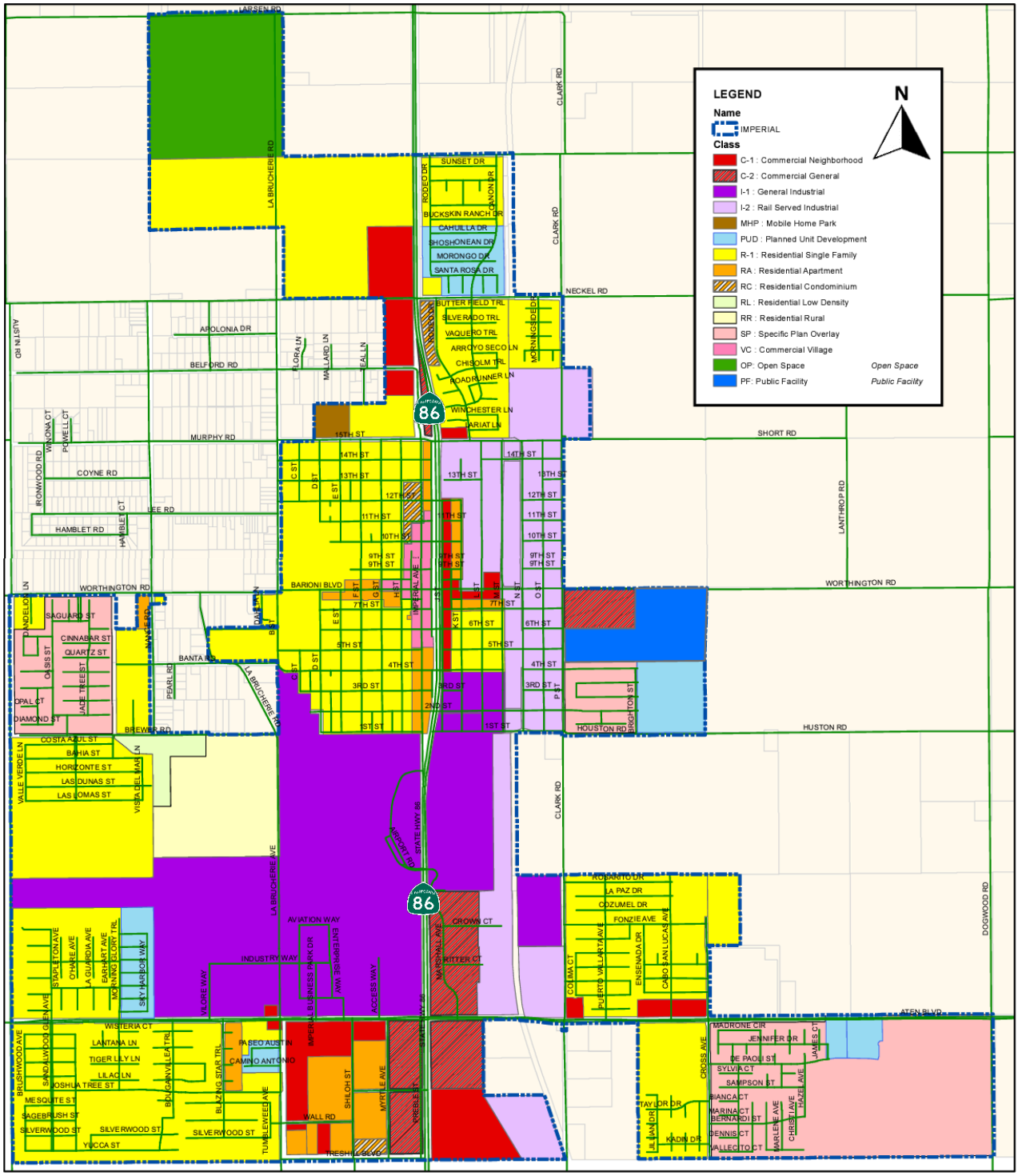
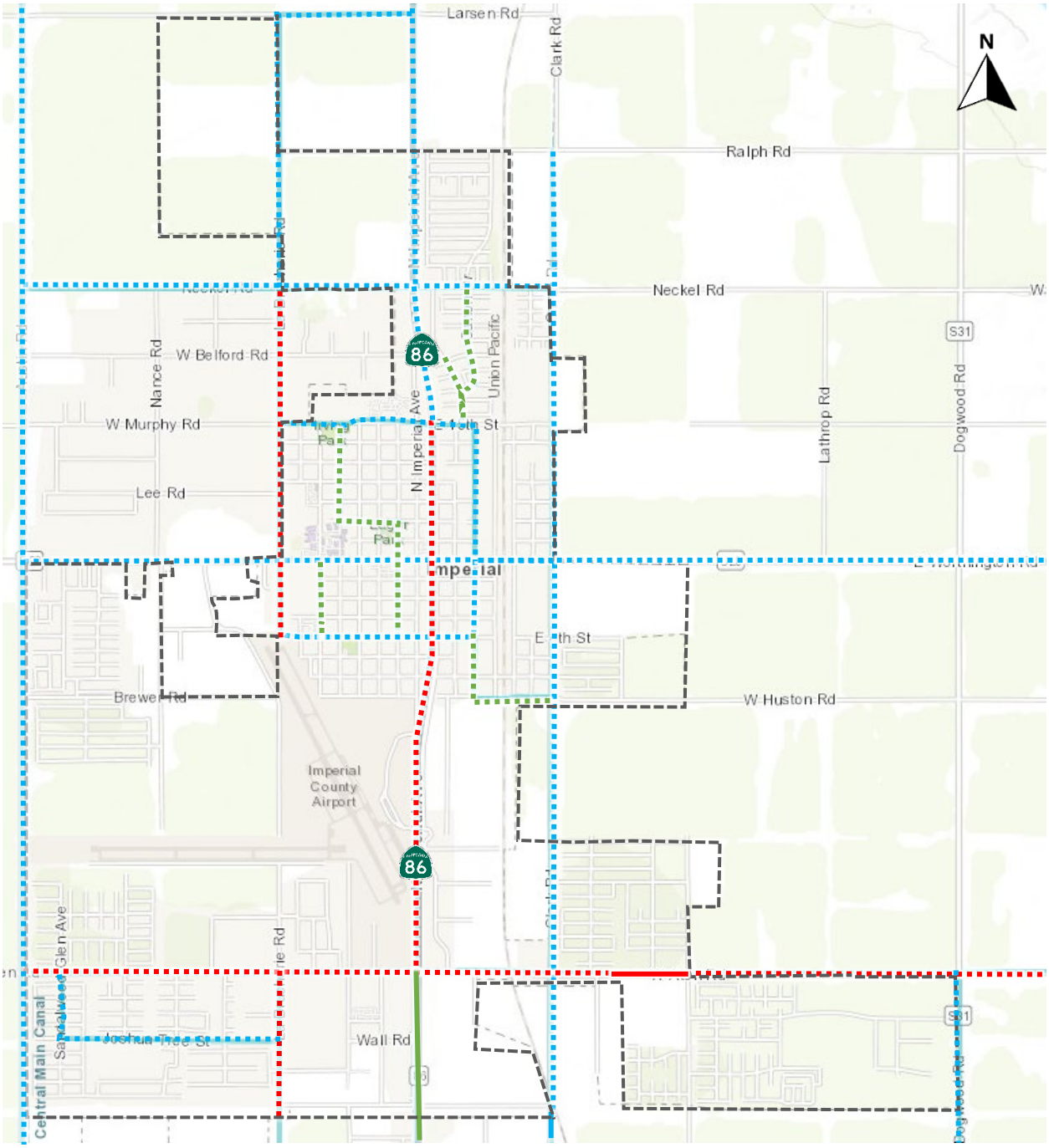


Figure 2: City of Imperial Zoning Map



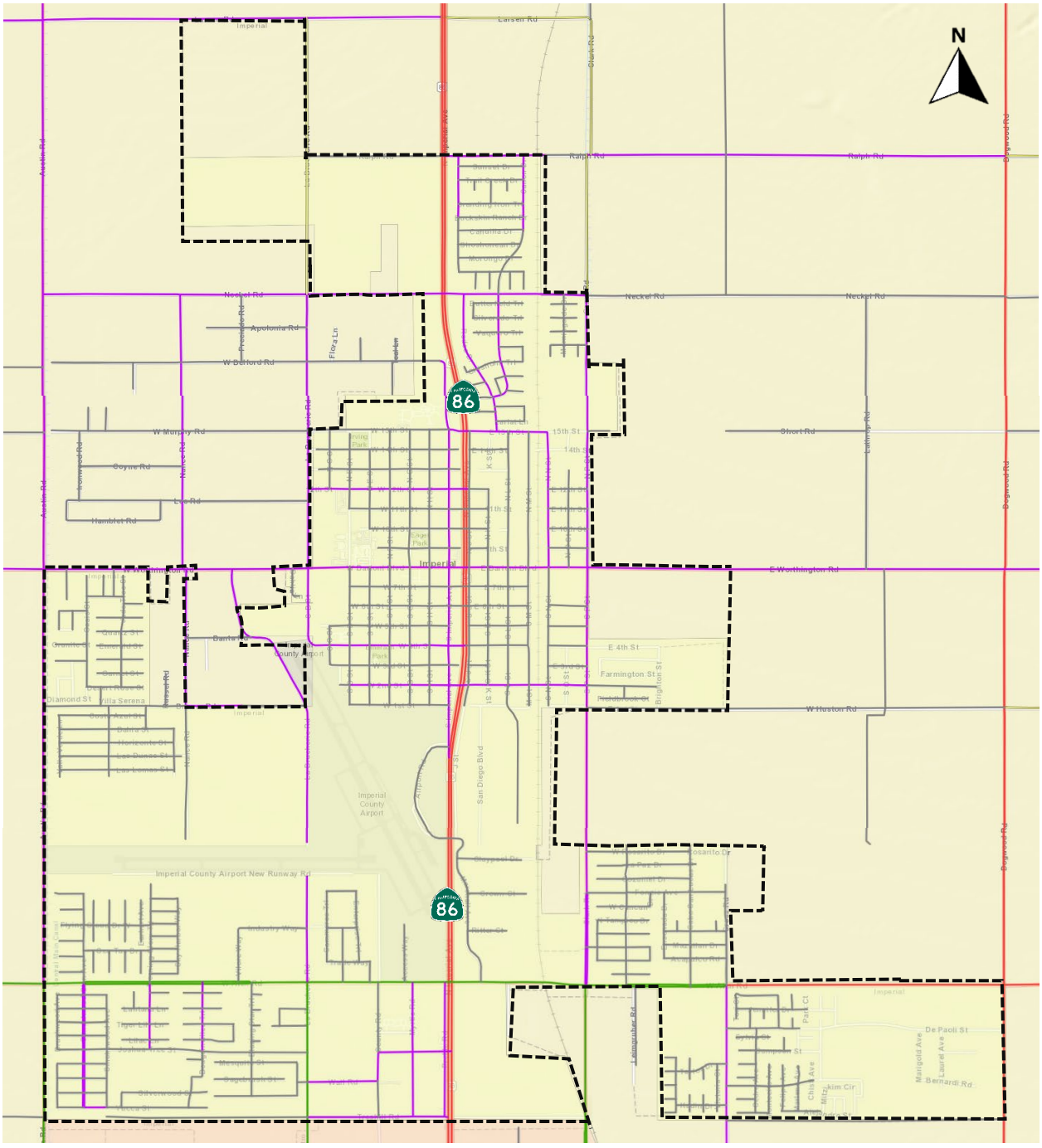
LEGEND

City Limits

Existing		Proposed	
	Class I		Class I
	Class II		Class II
	Class III		Class III

Figure 3: City of Imperial Existing and Proposed Bikeways

Source: Imperial County Transportation Commission's (ICTC) *Regional Active Transportation Plan*, Feb, 2022.



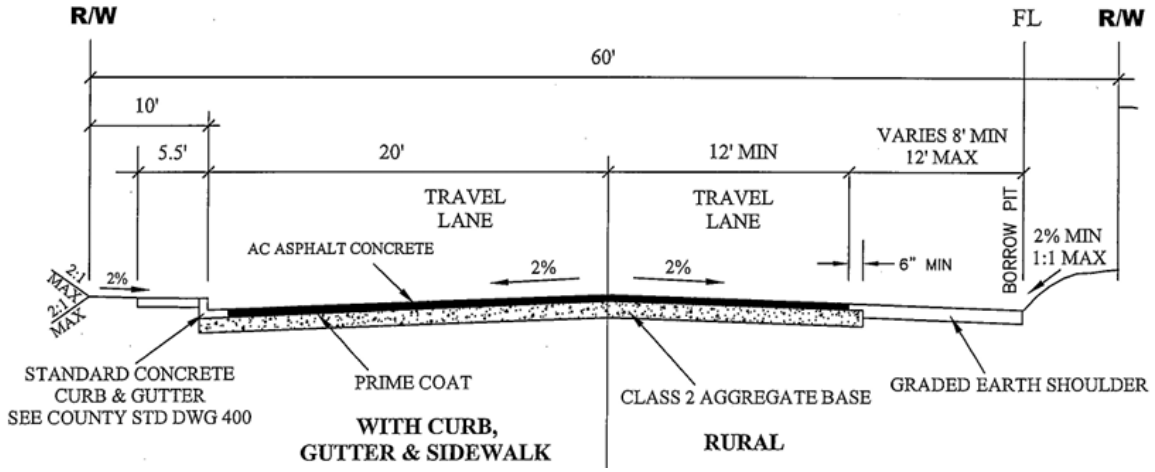
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Principal Arterial	Major Collector
Minor Arterial	Minor Collector
City Limits	Local

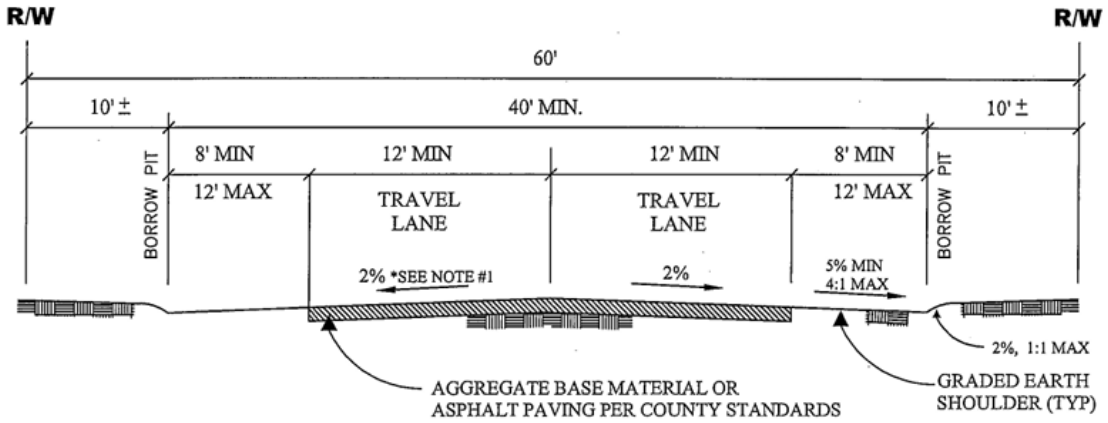
Figure 4: City of Imperial Function Classification (FC) Roadway Map

Source: Caltrans' *California Road System (CRS)* Map, 2023.

Local Street



Rural Local Road



2-Lane Minor Collector/Industrial Street – Parking

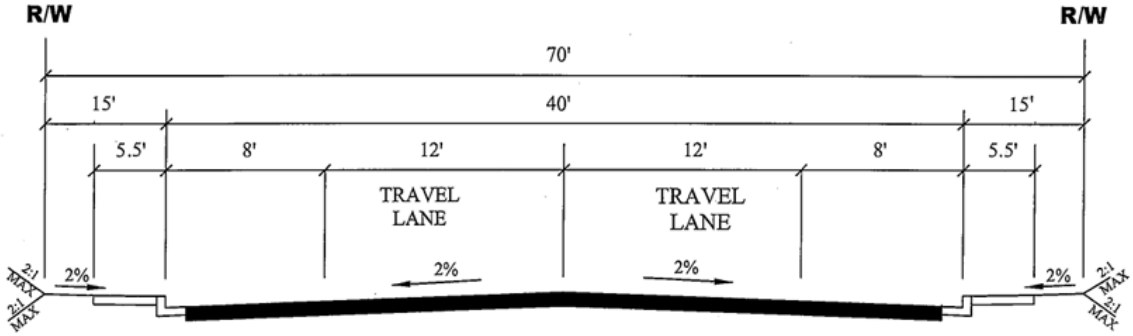
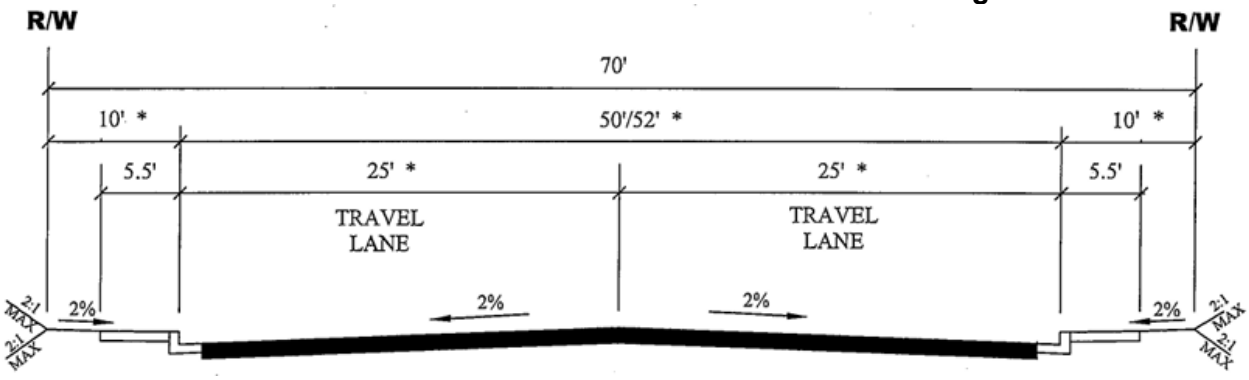


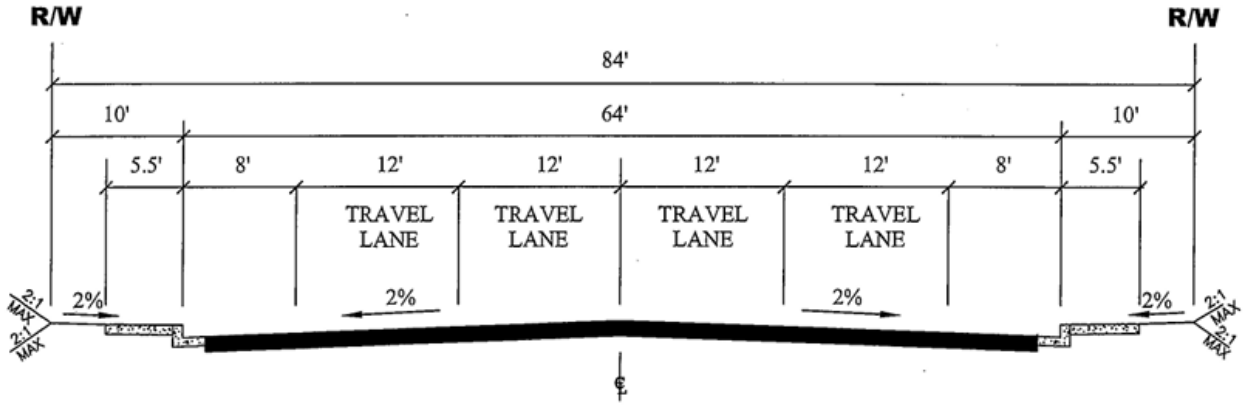
Figure 5.1: Typical Street Cross Sections in Imperial County

Source: County of Imperial's *Engineering Design Guidelines Manual for the Preparation and Checking of Street Improvement, Drainage and Grading Plans Within Imperial County*, Sept. 2008.

4-Lane Minor Collector/Industrial Street – No Parking



4-Lane Major Collector



Industrial Collector

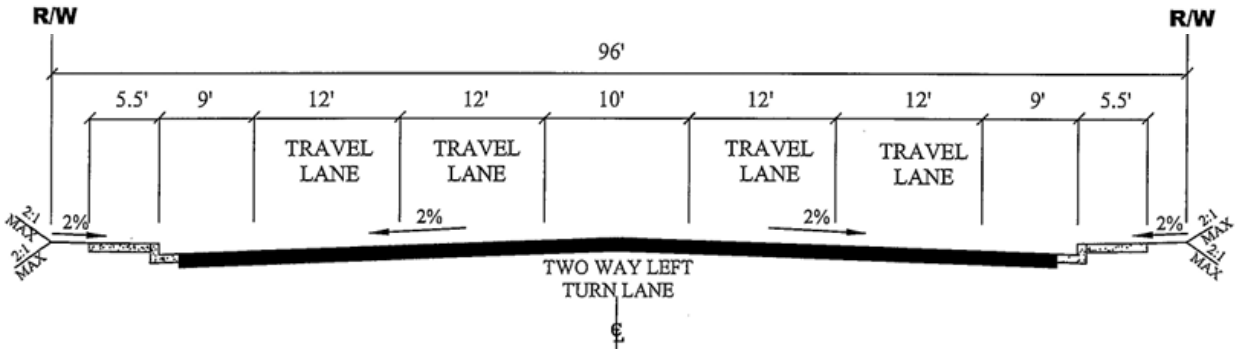
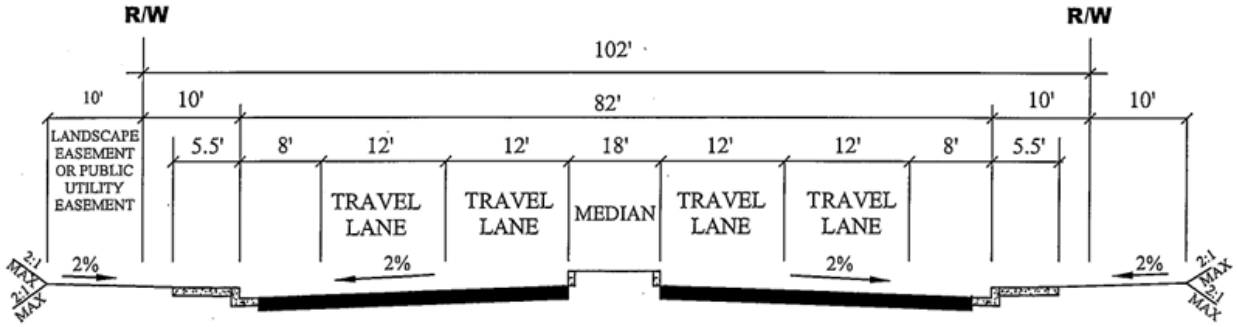
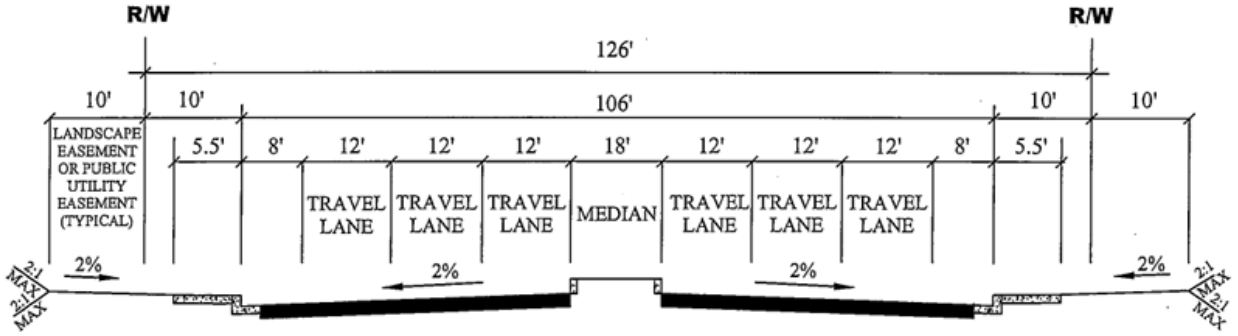


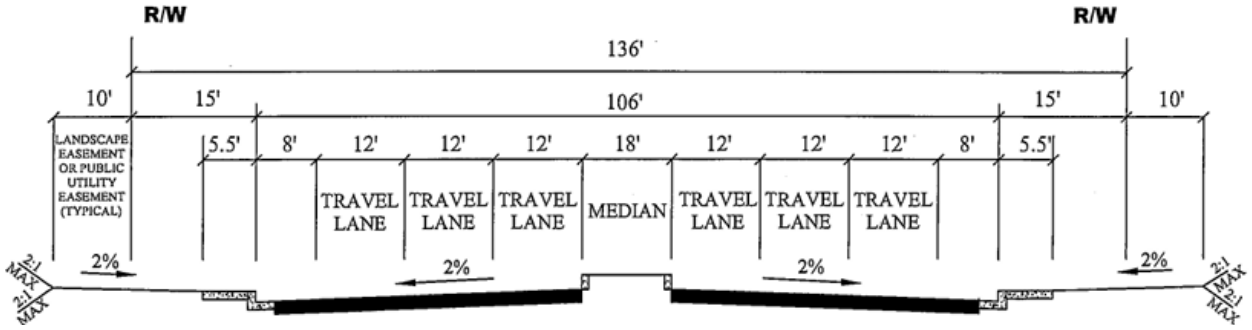
Figure 5.2: Typical Street Cross Sections in Imperial County

4-Lane Minor Arterial (Median with Single or Dual Left Turn)



Prime Arterial (Median with Single or Dual Left Turn)





Expressway

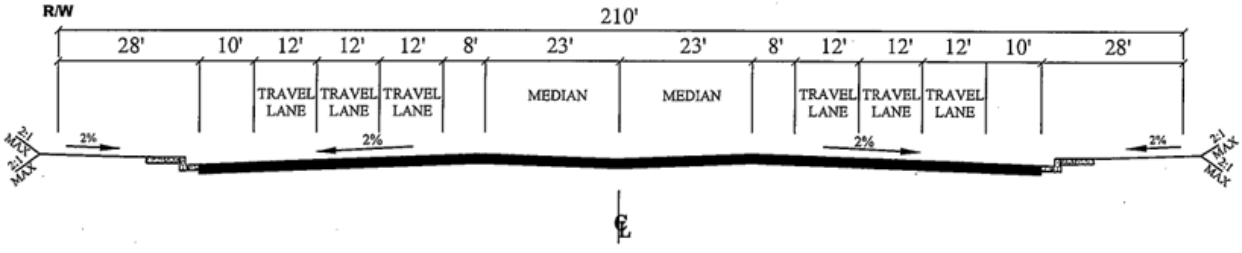
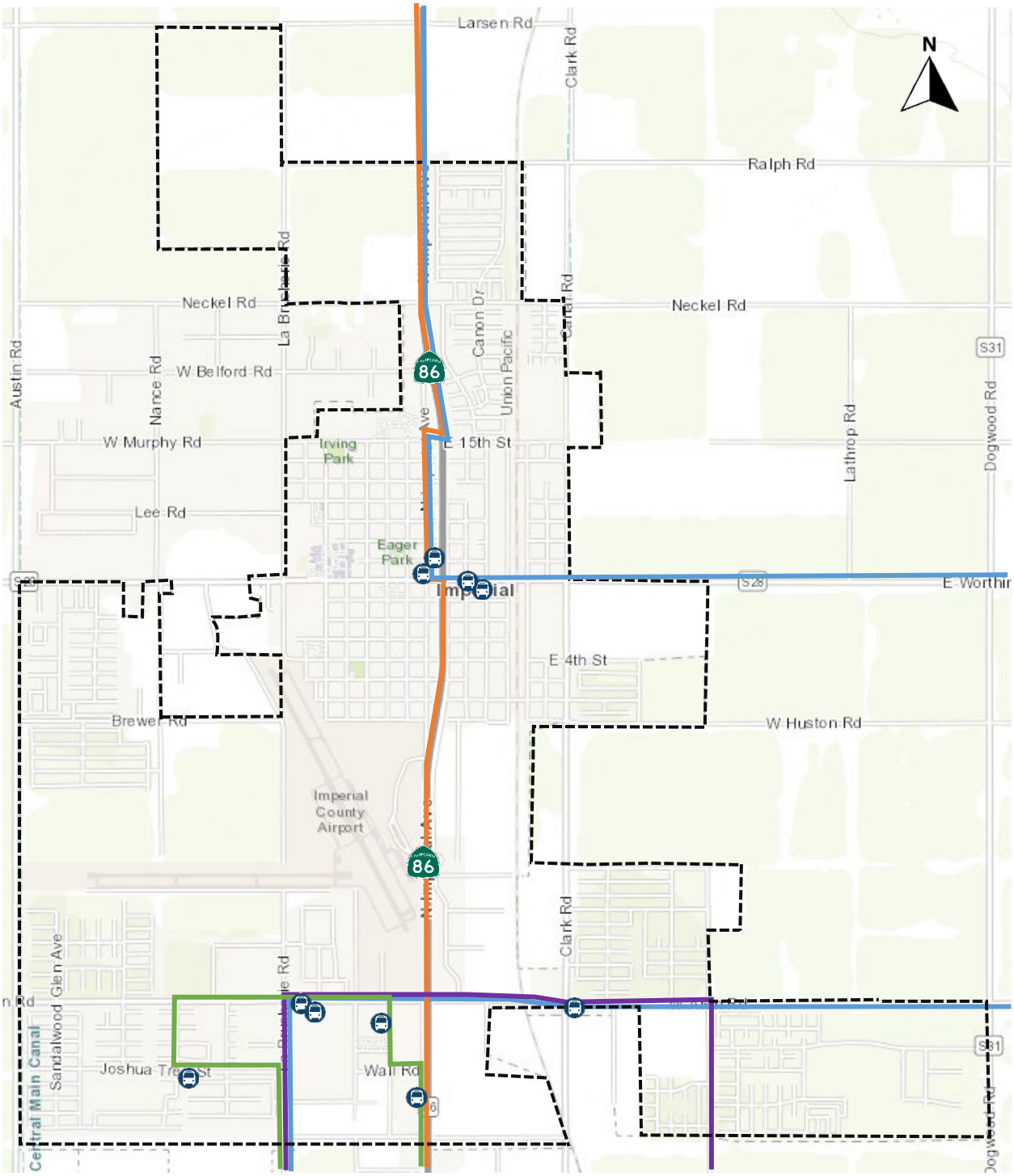


Figure 5.3: Typical Street Cross Sections in Imperial County

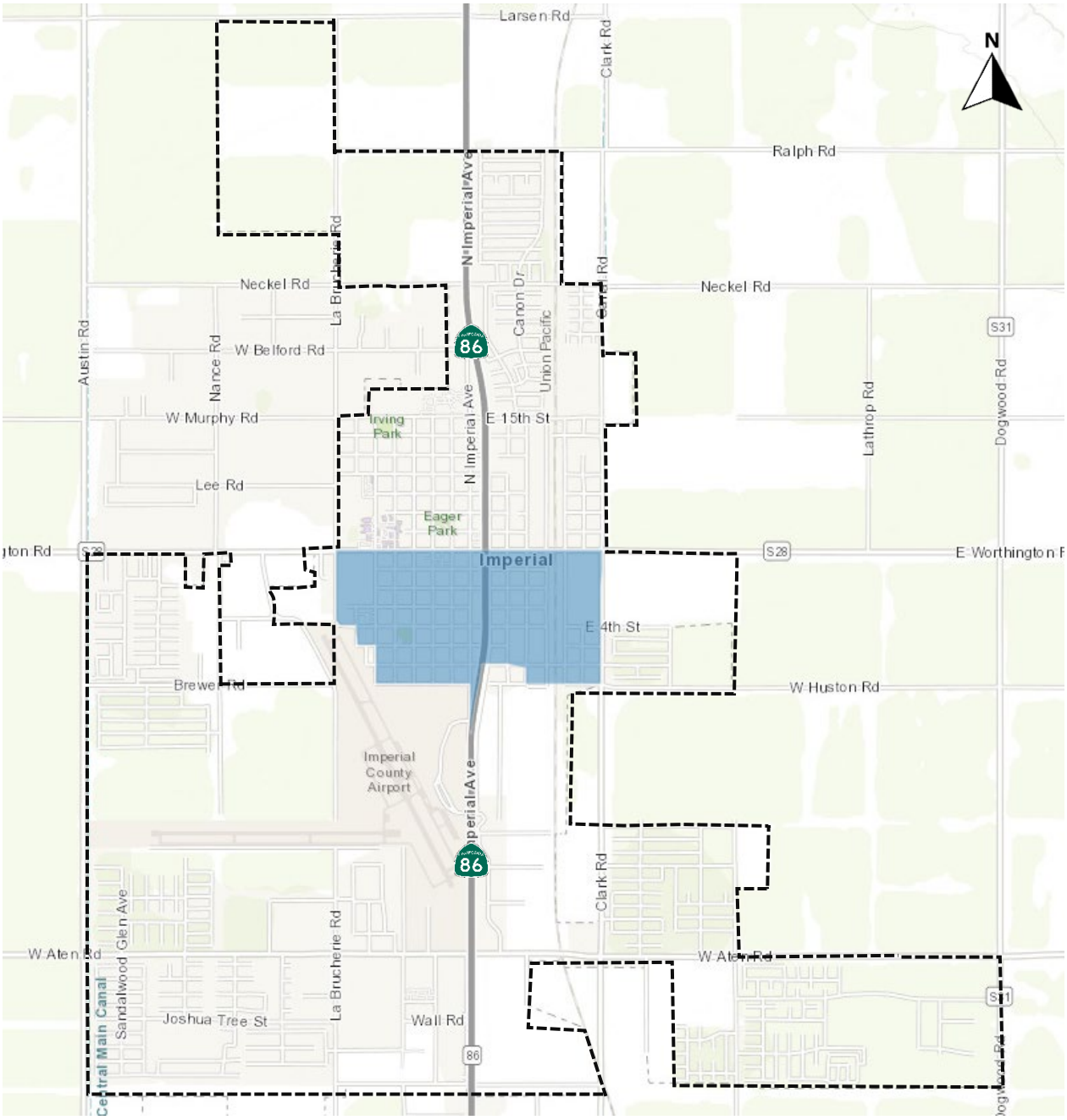


LEGEND

Transit Stop	Route 2	Route 41
City Limits	Route 3	Green Line

Figure 6: City of Imperial Transit Routes

Source: Imperial Valley Transit



LEGEND

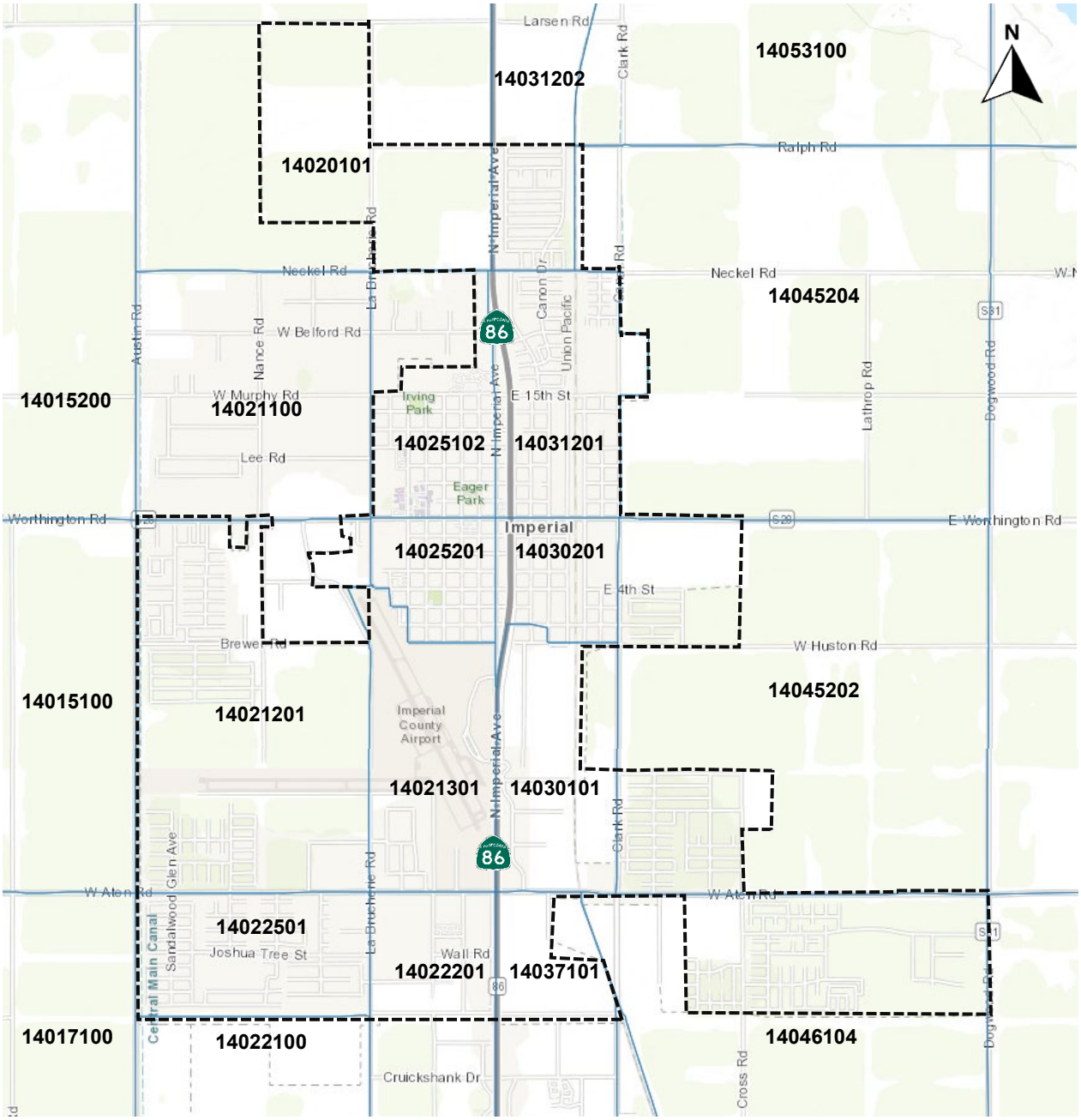
Neighborhood Mobility Area

City Limits

Neighborhood Mobility Area (NMA) – defined by the Southern California Association of Governments (SCAG) as an area in a City targeted to encourage more transportation alternatives. These areas are characterized by homes surrounded by local retail establishments, with short blocks and multiple intersections.

Figure 7: City of Imperial Neighborhood Mobility Areas (NMAs)

Source: Southern California Association of Governments' (SCAG) *Neighborhood Mobility Areas (NMA) – SCAG Region* Map, Updated Feb. 8, 2022.



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000000 **TAZ Number**

TAZ Boundary

City Limits

Traffic Analysis Zone (TAZ) – unit of geography commonly used in conventional transportation planning models, usually assigned information such as socioeconomic data. Though the size and spatial extent of a TAZ varies, a zone of under 3,000 people is common.

Figure 8: Traffic Analysis Zones (TAZs) in the City of Imperial

Source: SCAG's *Transportation Analysis Zones (TAZs) – Tier 2* Map, Updated Feb. 14, 2022.

2.0 – Vehicle Miles Traveled (VMT) Analysis Methodology

As per the Technical Considerations of the December 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), Vehicle Miles Traveled (VMT) defines the automobile travel as the distance attributable to cars and light trucks and does not assess the impact of larger heavy-duty trucks and vehicles.

Per the City's request, impact from large trucks will also be considered in VMT analysis of projects in the City of Imperial. This will be achieved through conversion of large truck trips to Passenger Car Equivalents (PCEs). For the purpose of this analysis, "large" trucks are defined as all vehicles exceeding 10,000 lbs.

Passenger Car Equivalent (PCE) – metric used to assess traffic flow impact. It represents the impact of a large vehicle (such as semi-trucks, city transit buses, or school buses) by expressing it as the number of equivalent passenger vehicles.

2.1 – Screening Analysis

OPR's technical advisory provides guidance on several opportunities for screening projects that would generate a low VMT. A project can be screened from VMT analysis if it satisfies one (1) or more of the four (4) screening criteria below:

1. Project Size
2. Retail Nature
3. Low VMT Area
4. Transit Priority Area

Specific requirements for satisfying each screening criteria are elaborated on in the following sections. Additionally, certain transportation projects do not require VMT analysis. A complete list of these projects is provided in ***Appendix A***.

2.1.1 – Project Size

If a Project is found to generate fewer than 110 daily vehicular trips, it can be assumed that there is an insignificant VMT impact and the project is exempt from further analysis. The 110 project trips is based off a study finding a linear relationship between gross floor area and trip generation for office buildings, where for the first 10,000 square feet of office space, there is approximately 110 trips generated.

The following facilities are exempt from this consideration:

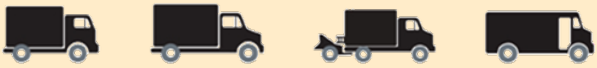
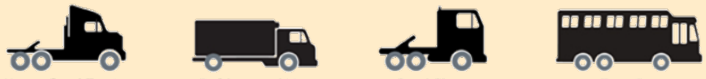
- Existing facilities
- Additions to existing facilities where the addition is less than 10,000 square feet in a location where public infrastructure is available and not environmentally sensitive

Daily vehicle trips can be calculated using trip generation rates specified in the ITE *Trip Generation Manual, 11th Edition* (Sept 2021) or the latest edition.

For projects such as warehouses or distribution centers that are expected to attract a majority of traffic from large trucks, a PCE factor of 2.0 can be multiplied to the expected number of these

truck trips in the calculation of the Project's total daily trips. The following table shows the PCE conversion rates for various vehicles to be used in the calculation of daily vehicle trips.

Table 2: Passenger Car Equivalent (PCE) Factors for VMT Analysis

Vehicle Classification	PCE Factor
Class 1 (6,000 lbs or less)  Full Size Pickup, Mini Pickup, Minivan, SUV, Utility Van	1.0
Class 2 (6,001 to 10,000 lbs)  Crew Size Pickup, Full Size Pickup, Mini Bus, Minivan, Step Van, Utility Van	1.0
Class 3 (10,001 to 14,000 lbs)  City Delivery, Mini Bus, Walk In	2.0
Class 4 (14,001 to 16,000 lbs)  City Delivery, Conventional Van, Landscape Utility, Large Walk In	2.0
Class 5 (16,001 to 19,500 lbs)  Bucket, City Delivery, Large Walk In	2.0
Class 6 (19,501 to 26,000 lbs)  Beverage, Rack, School Bus, Single Axle Van, Stake Body	2.0
Class 7 (26,001 to 33,000 lbs)  City Transit Bus, Furniture, High Profile Semi, Home Fuel  Medium Semi Tractor, Refuse, Tow	2.0
Class 8 (33,001 lbs and over)  Cement Mixer, Dump, Fire Truck, Fuel  Heavy Semi Tractor, Refrigerated Van, Semi Sleeper, Tour Bus	2.0

2.1.2 – Retail Nature

Certain locally serving retail projects, public facilities, community purpose facilities, and transportation projects are excluded from VMT analysis, as they are presumed to have a less than significant impact unless there is substantial evidence suggesting otherwise. The following list of projects and facilities are excluded from VMT analysis:

Table 3: Projects Excluded from VMT Analysis

Retail Projects

• Locally serving retail projects <50,000 square feet serving the local community
  ○ Example, gas stations
  ○ Restaurants
  ○ Commercial shops
  ○ Grocery stores

Public Facilities/Community Purpose Facilities	
• K-12 public schools	• Post offices
• Libraries	• Daycare centers
• Senior housing	• Assisted living facilities
• Affordable housing projects	• Student housing on/adjacent to college campuses
• Police and fire facilities	• Parks and trailheads

• Government offices
  ▪ Example, City Clerk office
  ▪ Parks & Recreation office
	• Passive public uses
	  ▪ Example, Water sanitation
	  ▪ Waste management

Other public uses as determined by the City	

Transportation Projects	
• Transit projects	• Bike projects
• Pedestrian projects	• Safety improvement projects
• Safe Routes to School	

This screening criteria applies to the entirety of a retail project and would not be applied to multiple tenants at a retail site separately. For mixed-use projects, this criterion should be applied to the retail/commercial/community facility separately to determine if that portion of the project screens out of a detailed VMT analysis.

2.1.3 – Low VMT Area

Residential projects can be exempt from further VMT analysis if the project's VMT per capita is 15% or more below the average regional residential home-based VMT per capita (see ***Figure 9***). Employment projects can be exempt if the project's VMT per capita is 15% or more below the average regional employee home-based VMT per employee (see **Figure 10**).

Figure 8 identifies low-VMT areas in the City of Imperial.

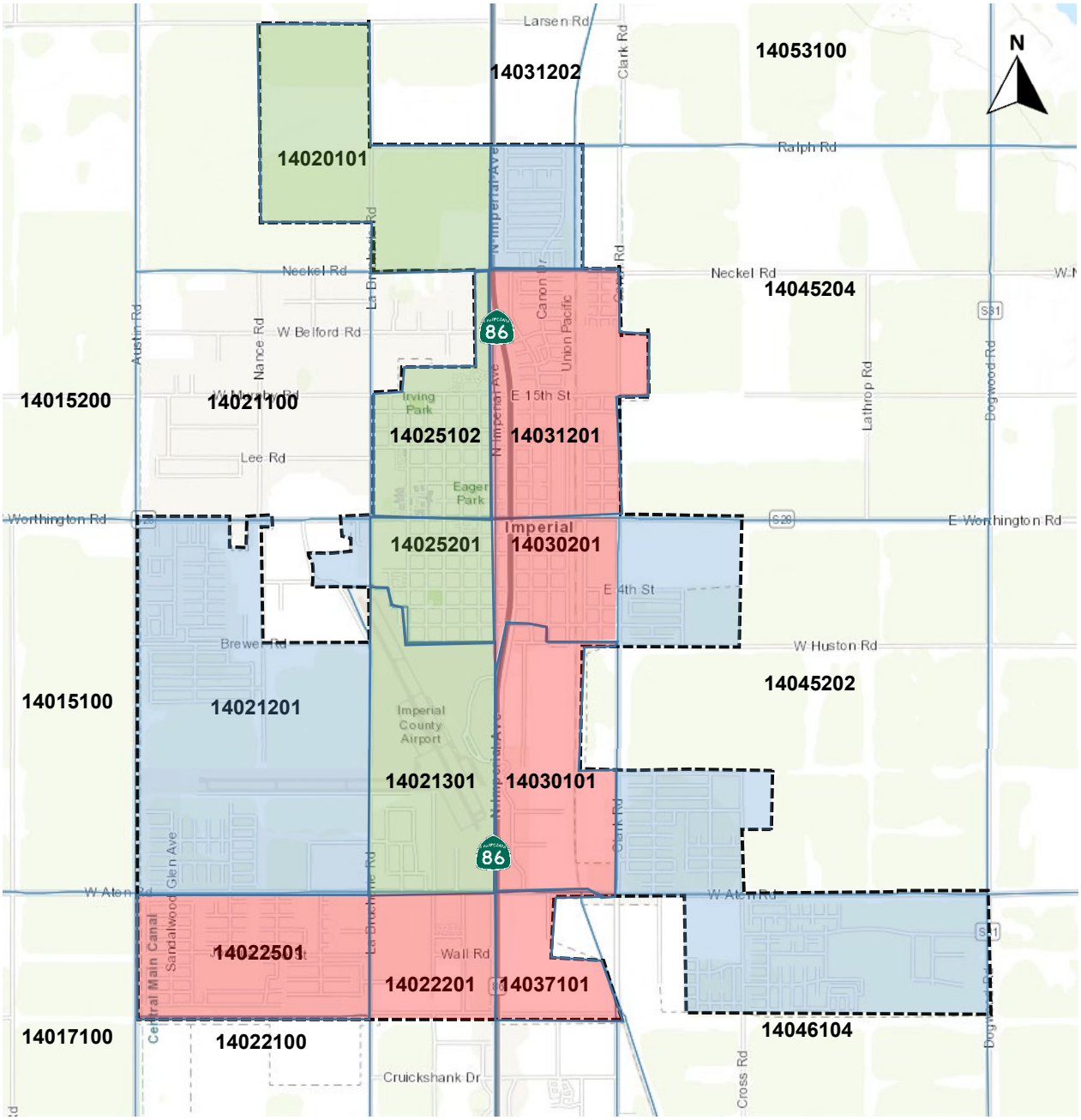


Figure 8: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (VMT/Service Population)

LEGEND

- *15% or More Below City Average*
- *0-15% Below City Average*
- *0-15% Above City Average*
- *15% or More Above City Average*

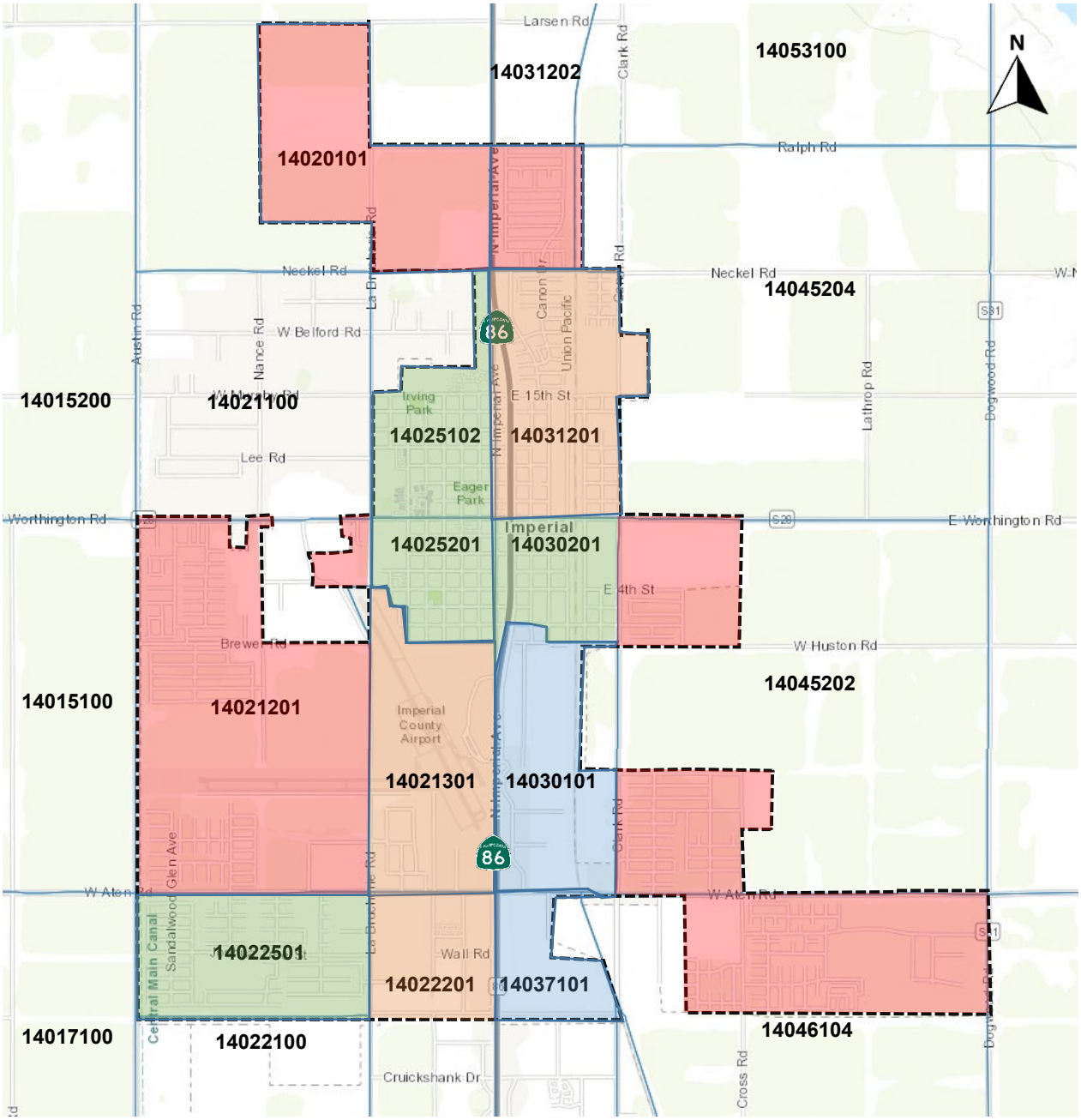


Figure 9: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (Residential Home-Based VMT/Capita)

LEGEND

- ***15% or More Below City Average***
- ***0-15% Below City Average***
- ***0-15% Above City Average***
- ***15% or More Above City Average***

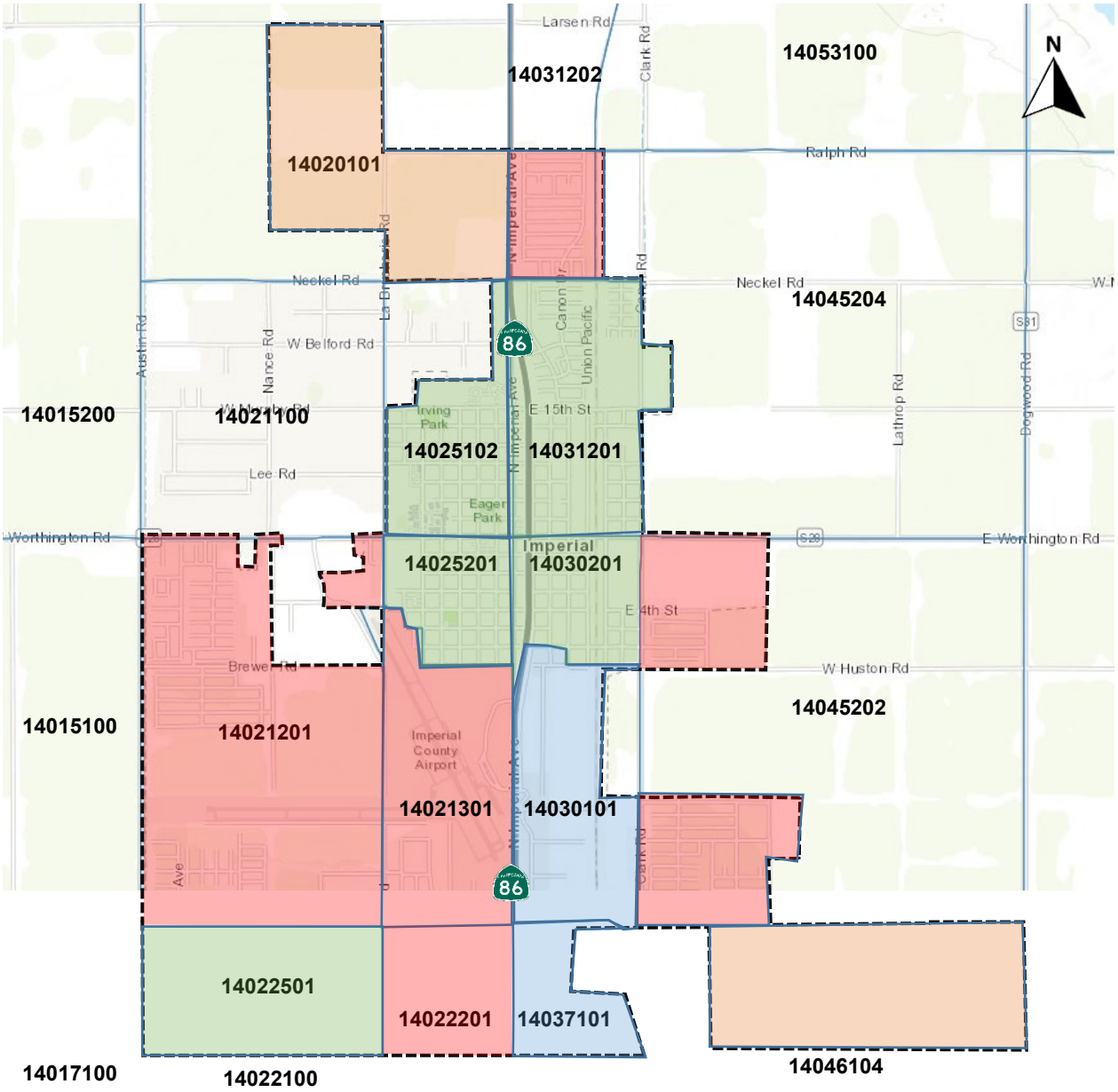


Figure 10: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (Employee Home-Based VMT/Employee)

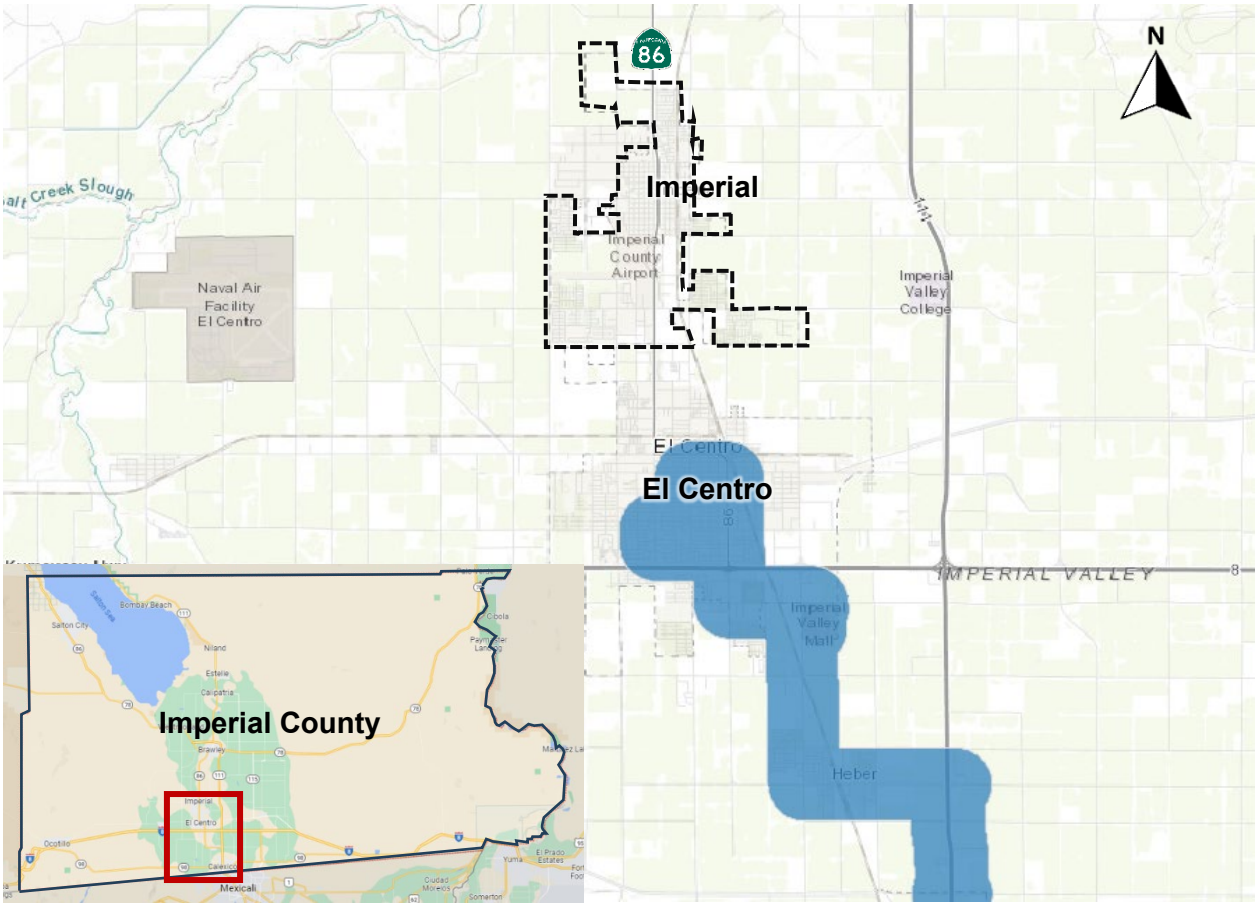
LEGEND

- ***15% or More Below City Average***
- ***0-15% Below City Average***
- ***0-15% Above City Average***
- ***15% or More Above City Average***

2.1.4 – Transit Priority Area

A Project can be exempt from further VMT analysis if the Project has a close proximity (within ½ mile) to a High-Quality Transit Corridor. Per California Public Resources Code – PRC Division 13 – Environmental Quality Chapter 2.5 - Section 21064.3, this is defined as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during morning and afternoon peak commute periods.

As shown in ***Figure 11***, the City of Imperial does not contain any High Quality Transit corridors; thus, no developments will be screened through this criterion.



LEGEND

High Quality Transit Area

City Limits

High Quality Transit Area (HQTA) – defined by the Southern California Association of Governments (SCAG) as an area within one half-mile from a well-serviced transit stop or a transit corridor with 15-minute of less service frequency during peak commute hours.

Figure 11: High Quality Transit Areas (HQTA) in Imperial County

2.2 – VMT Analysis Requirements

To provide a comprehensive analysis of the VMT for the City of Imperial, existing VMT values generated from the Imperial County Transportation Model (ICTM) are provided for the City of Imperial and Imperial County for the 2014 Base Year and 2040 Horizon Year in **Table 4**. The table provides values to use for the Production-Attraction methodology recommended for the City of Imperial.

Table 4: City and County of Imperial Baseline and Horizon Year VMT Summary[7]

	City of Imperial		County of Imperial	
	2014 Base Year	*2040 Horizon Year*	*2014 Base Year*	*2040 Horizon Year*
VMT per Service Population	5.73	3.23	4.63	4.32
Residential Home-Based VMT per Capita	5.32	2.85	4.57	4.32
Employee Home-Based VMT per Employee	1.46	2.38	1.90	1.49

The VMT threshold used will depend on the proposed project's land use. For example, residential projects will refer to the *Residential Home-Based VMT per Capita* values. If the project's VMT is 15% or more below the baseline VMT value in the opening year, calculated through linear interpolation from the 2014 and 2040 values, the project can be assumed to have insignificant VMT impact. Alternatively, residential projects would refer to the *Employee Home-Based VMT per Employee* values. Warehouses, manufacturing centers, distribution centers, or other similar projects may refer to the *VMT per Service Population* values.

Alternatively, one may refer to the Low VMT Area maps (***Figures 8-10***) to determine if the project resides in a low VMT area that is 15% or more below the baseline VMT. If so, the project can be assumed to have less than significant impact and no further calculations are necessary.

[7] Source: Caltrans District 11's Imperial County Transportation Model (ICTM).

2.3 – Land Development Projects

The types of trips used for the VMT analysis is dependent upon the project development type. The following project development types and their respective guidelines will be used for the analysis. The project's analysis of resulting VMT rate will be evaluated and compared against the VMT rate threshold calculated below.

The VMT rate for residential and non-residential projects may be found using the equation below, where difference in VMT with and without the Project is divided by the parcel population or number of employees with and without the Project:

$$\textbf{(1) Project VMT Rate} = \frac{VMT_{Project} - VMT_{Existing}}{Pop\ or\ Emp_{Project} - Pop\ or\ Emp_{Existing}}$$

Project VMT can be calculated with Equation (2), as provided on the following page.

Existing VMT can be calculated through linear interpolation with the values provided in ***Table 4.***

An estimate of the Project Population/Employment can be found by multiplying the employment density by the project parcel size, while Existing Population/Employment will depend on the time of the VMT analysis' preparation and the most current data available at that time. As of SCAG's *Employment Density Study Summary Report*, October 31, 2001, the employment density is dependent on the land use category and is summarized in **Table 5: Imperial County Employment Density Summary.** Due to retail projects being highly dependent on external factors, there is not a service population density for retail projects at the time of this technical memorandum.

Table 5: Imperial County Employment Density Summary

	Land Use Type	Average Employees Per Acre*
Commercial	Regional Retail	N/A**
	Other Retail	15.07
	Low-Rise Office	17.90
	Hotel/Motel	32.20
	Misc. Commercial	0.38
Industrial	Light Manufacturing	4.80
	Heavy Manufacturing	N/A**
	Warehouse	16.17
	Government Office	3.63
Public/ Other	Residential	1.37
	Transportation	0.66
	Open Space	0.05

* 1 Acre = 43,650 Square Feet
** N/A: Not Available

Source: SCAG's Employment Density Study Summary Report, Oct. 31, 2001.

The project VMT rate will be compared against the project's respective thresholds to determine whether the additional VMT created by the project is significant. The project VMT can be calculated with the following equation:

(2) $VMT_{Project}$ = [Avg. Trip Length] x [Project Trip Generation]

Average Trip Length depends on the type of project. Average trip length values to be used in the project VMT calculation, derived from the 2012 SCAG Regional Travel Demand Model and 2010-2012 California Household Travel Survey, are provided below in ***Table 6***.

Table 6: Imperial County Average Trip Length

Project Type	Average Trip Length (Miles)
Residential	8.56
Employment/Office	25.8
Retail	17.7
Distribution Centers/ Warehouses/Logistic Centers	17.7
Mixed-Use	3.96

Project Trip Generation depends on the size and land use of the project, and can be calculated using trip generation rates specified in the ITE *Trip Generation Manual, 11th Edition* (Sept 2021) or the latest edition.

2.4 – Transportation Projects

As mentioned in the OPR, transportation projects that will not significantly impact the amount of vehicle travel can be excluded from VMT analyses. A complete list of transportation projects that are exempt from VMT analysis is provided in ***Appendix A***. However, transportation projects that increase roadway capacity and induce travel are subject to VMT analysis.

OPR provides the following equation to determine a transportation project's VMT:

[% increase in lane miles] x [existing VMT] x [elasticity] = [VMT resulting from the project]

Where the *elasticity* is an estimate of the percent change in VMT for every percent change in miles to the roadway system. Based off studies performed by the Governor's Office of Planning and Research, an *elasticity* of 1% can be assumed. The National Center for Sustainable Transportation offers an analysis tool, utilizing the aforementioned equation for Caltrans maintained facilities: https://travelcalculator.ncst.ucdavis.edu or https://blinktag.com/induced-travel-calculator.

If a project is expected to create a net increase in City VMT, it is found to have a significant impact, and mitigations may be required.

2.5 – VMT Analysis Format

A VMT Analysis report must contain the following components at a minimum:

- **Introduction:** Briefly summarizes the report's purpose and methodology used.

- **Executive Summary**: Provides a 1- or 2-page summary of the Project description, trip generation, screening criteria analysis, any proposed mitigations, and the expected % VMT reduction due to these mitigations (if applicable).

- **Project Description:** Provides information on the proposed Project site's existing conditions, such as location, land use, and local transportation network. This can include information on the regional highway system, local roadway system, transit routes, and pedestrian/bicycle networks.

- **VMT Analysis:**
    - **Project Trip Generation:** Calculates the Project's expected Daily Vehicle Trips, utilizing information such as the land use, quantity, unit, and appropriate land use code from the latest ITE *Trip Generation Manual.* Calculated values for AM Peak Hour Trips (In, Out, and Total) and PM Peak Hour Trips (In, Out, and Total) should also be provided in addition to Daily Vehicle Trips.

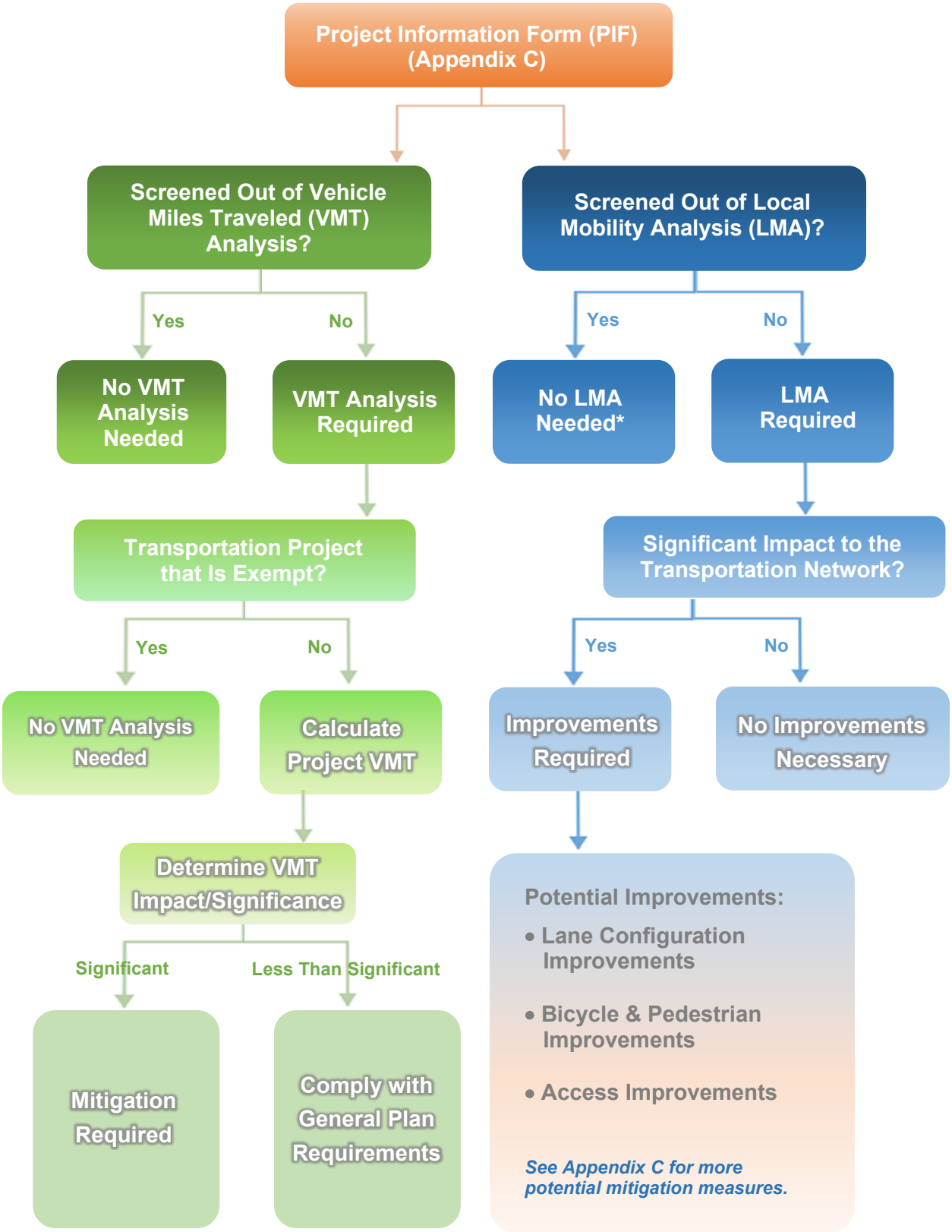
    - **Screening Analysis**: Describes the Project's fulfillment (or unfulfillment) of each of the four screening criteria, with the appropriate calculations, maps, or visual exhibits provided for justification.

- **Mitigation Measures** (if needed): Provides a list of applicable mitigation measures that can lower the Project's VMT to the necessary threshold, if none of the screening criteria are satisfied. This section should calculate the proposed mitigations' expected % VMT reduction. The threshold to be reached is 15% or more below the regional average VMT for the Project's respective target population (VMT per capita, VMT per employee, etc.)

- **Conclusion:** Summarizes the Project's VMT impact, cumulative VMT impact, and reiterates the screening analysis results and any proposed mitigations.

Depending on the conditions and environment of each Project, additional sections may be included to provide additional information or justification.

Figure 12: VMT Analysis and LMA Flowchart



*Other studies such as driveway sight distance, queuing, safety analysis, etc. may be required as per the City's discretion.

3.0 – Local Mobility Analysis (LMA) Methodology

Although VMT is now the metric used for determining the significance of vehicle travel-related impacts under CEQA, the transportation network must be overall consistent with adopted standards and policies while considering impact from pedestrians, bicycles, and transit.

Thus, the Local Mobility Analysis (LMA) is required with the submittal of a VMT Analysis to provide an understanding of the existing and future transportation network surrounding a newly implemented development, and identify any facilities that may need improvement to maintain acceptable operating conditions.

3.2 – LMA Requirements

Projects that generate less than 800 daily vehicle trips are not required to prepare an LMA. However, the City may request additional analysis, such as an access, parking, or circulation assessment for the site, due to the Project's location, complexity, or other characteristics.

Projects that generate over 800 daily vehicle trips are required to analyze:

- Project driveways and intersections where the project is expected to generate 50 peak hour Passenger Car-Equivalent (PCE) trips
- Roadway segments fronting the Project and between the analyzed intersections
- Bicycle, Pedestrian, and Transit facilities at the Project frontage

Traffic analysis scenarios may include:

- Existing Year Conditions
- Opening Year Conditions
- Opening Year with Project Conditions
- Horizon Year Conditions
- Horizon Year with Project Conditions

Peak hour intersection analyses shall include AM and PM peak hour. The AM peak hour is defined as the one hour of highest traffic volumes between 6:00-9:00AM, while the PM peak hour is defined as the one hour of highest traffic volume between 4:00-7:00PM. Two-hour peak hour period Turning Movement Counts (TMCs) including vehicles, bicycles, and pedestrian volumes should be collected for all study intersections, and weekday 24-hour Average Daily Traffic (ADT) counts should be collected for all study roadway segments. Traffic counts should be conducted on a Tuesday, Wednesday, or Thursday when schools are in session and not during a week of a major holiday. Traffic counts should be included as an Appendix in the LMA report.

Intersection and queuing analyses must abide by the methodologies described in the latest *Highway Capacity Manual* (HCM), or other practices developed in coordination with the City.

3.3 – Level of Service (LOS) Analysis

As per the Circulation Element of the City of Imperial's *General Plan, (*June 2017), the acceptable LOS threshold for an intersection is C or higher. Definitions and thresholds for LOS levels are provided in the following table.

Table 7: Level of Service (LOS) Definitions

Level of Service	Roadway Performance Standard	Intersection Control Delay (Sec/Vehicle)	
		Signalized	Unsignalized
LOS A	Represents free flow. Individual drivers have a high degree of freedom to select their travel speeds and are unaffected by other vehicles.	≤10.0	≤10.0
LOS B	Represents stable flow, but individual drivers are somewhat affected by other vehicles in determining travel speeds.	>10.0 to ≤20.0	>10.0 to ≤15.0
LOS C	Represents stable flow, but the selection of the speeds of individual drivers is significantly affected by other drivers.	>20.0 to ≤35.0	>15.0 to ≤25.0
LOS D	Represents a condition of high density, stable traffic flow in which speed and freedom of movement are severely restricted by the presence of other vehicles.	>35.0 to ≤55.0	>25.0 to ≤35.0
LOS E	Represents operating conditions at or near capacity. Individual vehicles have little freedom to maneuver within the traffic stream and any minor disruptions can cause a breakdown in the flow of traffic.	>55.0 to ≤80.0	>35.0 to ≤50.0
LOS F	Represents breakdown conditions. At this level of service, speeds are low, delays are high, and there are more vehicles entering the roadway than can be accommodated.	>80.0	>50.0

In the event that a project is found to significantly impact the Level of Service (LOS) of an unsignalized intersection, a Traffic Signal Warrant Assessment (TSWA) may be performed to determine whether signalizing the intersection is a feasible mitigation measure. The TSWA must be compliant with the methodology provided by latest CA-MUTCD (7th Revision of the 2014 CA-MUTCD as of the time this memorandum was written).

3.3 – LMA Format

An LMA must contain the following components at a minimum:

- **Introduction:** Briefly summarizes the report's purpose and methodology used.

- **Executive Summary**: Provides a summary of the Project description, any study intersections/roadway segments, scenarios under which they were analyzed, traffic analysis findings, any proposed mitigations, and the expected improvement in LOS or delay with these mitigations (if applicable).

- **Study Area Selection and Analysis Methodology:** Provides information on the study area's existing conditions, such as location, land use, and local transportation network. This can include information on the regional highway system, local roadway system, transit routes, and pedestrian/bicycle networks. Additionally, this section will describe the study intersections/roadway segments and the scenarios under which they were analyzed.

- **Project Trip Generation:** Calculates the Project's anticipated trip generation, distribution, and assignment, utilizing information such as the collected TMC/ADT/vehicle classification data, land use, quantity, unit, and appropriate land use code from the latest ITE *Trip Generation Manual (*As of March 2024, *11th Edition,* September 2021). Visual exhibits such as maps may be provided to assist in the understanding of trip distribution and assignment.

- **Substantial Traffic Effects:** Documents the traffic analysis results as well as any potential substantial effects to the surrounding transportation network for the required analysis scenarios.

- **Necessary Improvements:** Identifies and describes the transportation improvements that would be necessary to accommodate the project. Sample improvements are provided in the table on the following page.

- **Conclusion:** Briefly summarizes the traffic analysis results and any proposed/necessary improvements.

Depending on the conditions and environment of each Project, additional sections may be included to provide additional information or justification.

Table 8: Potential Transportation Improvements

	Transportation Improvement
Roadway	• Signing/Striping • Addition of lanes
Signalized Intersection	• Signal retiming • Signal Upgrade/Intelligent Transportation System (ITS) • Add additional turn lane • Extend existing turn pocket
Unsignalized Intersection	• Implement signal • Add roundabout • Implement turn restrictions • Add additional turn lanes
Pedestrian	• High-visibility crosswalks • Pedestrian countdown signals • Leading Pedestrian Intervals (LPI) • Rectangular Rapid Flashing Beacons (RRFB) • Pedestrian hybrid beacons
Bicycle	• Addition of dedicated bicycle lanes • Additional/improved signage • End-of-trip facilities (Bicycle Parking)

Improvements shall be discussed with City staff to determine appropriate and fundable measures.

Appendix A:
Transportation Projects That Do Not Require VMT Analysis

Transportation Projects That Do Not Require VMT Analysis

The following complete list is provided in the OPR Technical Advisory (December 2018, pages 20-21) for transportation projects that "would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis":

- Rehabilitation, maintenance, replacement, safety, and repair projects designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; Transportation Management System field elements such as cameras, message signs, detection, or signals; tunnels; transit systems; and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle capacity

- Roadside safety devices or hardware installation such as median barriers and guardrails

- Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles, to provide bicycle access, or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes

- Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety

- Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes

- Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit

- Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially increase vehicle travel

- Addition of a new lane that is permanently restricted to use only by transit vehicles

- Reduction in number of through lanes

- Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g., HOV, HOT, or trucks) from general vehicles

- Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features

- Installation of traffic metering systems, detection systems, cameras, changeable message signs and other electronics designed to optimize vehicle, bicycle, or pedestrian flow
- Timing of signals to optimize vehicle, bicycle, or pedestrian flow
- Installation of roundabouts or traffic circles • Installation or reconfiguration of traffic calming devices
- Adoption of or increase in tolls
- Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase
- Initiation of new transit service
- Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes
- Removal or relocation of off-street or on-street parking spaces
- Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)
- Addition of traffic wayfinding signage
- Rehabilitation and maintenance projects that do not add motor vehicle capacity
- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve nonmotorized travel
- Installation of publicly available alternative fuel/charging infrastructure
- Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor

Appendix B: VMT Mitigation Measures

Vehicle Miles Traveled (VMT)/ Greenhouse Gas (GHG) Mitigation Measures

#	Measure Title	Project Site Plan/ Community	Potential VMT Reduction
Land Use			
T-1	Increase Residential Density	P/S[10]	30%
T-2	Increase Job Density	P/S	30%
T-3	Provide Transit-Oriented Development	P/S	31%
T-4	Integrate Affordable & Below Market Rate Housing	P/S	28.6%
T-17	Improve Street Connectivity	P/C[11]	30%
Trip Reduction Programs			
T-5	Implement Commute Trip Reduction Program (Voluntary)	P/S	4%
T-6	Implement Commute Trip Reduction Program (Mandatory)	P/S	26%
T-7	Implement Commute Trip Reduction Marketing	P/S	4%
T-8	Provide Ridesharing Program	P/S	8%
T-9	Implement Subsidized or Discounted Transit Program	P/S	5.5%
T-10	Provide End-of-Trip Bicycle Facilities	P/S	4.4%
T-11	Provide Employer-Sponsored Vanpool	P/S	20.4%
T-12	Price Workplace Parking	P/S	20%
T-13	Implement Employee Parking Cash-Out	P/S	12%
T-23	Provide Community-Based Travel Planning	P/C	2.3%
Parking or Road Pricing/Management			
T-14	Provide Electric Vehicle Charging Infrastructure	P/S	11.9%
T-15	Limit Residential Parking Supply	P/S	13.7%
T-16	Unbundle Residential Parking Costs from Property Cost	P/S	15.7%
T-24	Implement Market Price Public Parking (On-Street)	P/C	30%
Neighborhood Design			
T-18	Provide Pedestrian Network Improvement	P/C	6.4%
T-19-A	Construct or Improve Bike Facility	P/C	0.8%
T-19-B	Construct or Improve Bike Boulevard	P/C	0.2%
T-20	Expand Bikeway Network	P/C	0.5%
T-21-A	Implement Conventional Carshare Program	P/C	0.15%
T-21-B	Implement Electric Carshare Program	P/C	0.18%
T-22-A	Implement Pedal (Non-Electric) Bikeshare Program	P/C	0.02%
T-22-B	Implement Electric Bikeshare Program	P/C	0.06%
T-22-C	Implement Scootershare Program	P/C	0.07%
Transit			
T-25	Extend Transit Network Coverage or Hours	P/C	4.6%
T-26	Increase Transit Service Frequency	P/C	11.3%
T-27	Implement Transit-Supportive Roadway Treatment	P/C	0.6%
T-28	Provide Bus Rapid Transit	P/C	13.8%
T-29	Reduce Transit Fares	P/C	1.2%
Clean Vehicles and Fuels			
T-30	Use Cleaner-Fuel Vehicles	P/S or P/C	100%

Source: California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, Dec. 2021.

[10] P/S = Project/Site
[11] P/C = Plan/Community

Appendix C: Project Information Form

Project Information Form (PIF)

The following is to be completed by the project applicant:

Project Information Form		
Project Description:		
Project Location:		
Land Use:	Size/Density:	
Zoning and Land Use Consistent with Adopted General Plan?	☐ Yes	☐ No

Owner/Applicant Information

Name:	
Address:	
Phone Number:	
Email:	

Consultant, Developer, or Project Representative

Name/Firm:	
Project Manager:	License(s):
Phone Number:	
Email:	

Required Attachments

Attach 11x17" copies of the project location/vicinity map, site plan, and project distribution/assignment map containing the following:

- *Driveway locations and access type*
- *Pedestrian access, bicycle access, on-site pedestrian circulation, and transit stop at project frontage (if applicable)*
- *Location of any planned sidewalks or bicycle facilities at project frontage (if applicable)*

Location/Vicinity Map	☐ Attached
Site Plan	☐ Attached
Project Trip Distribution/Assignment Map	☐ Attached
List/Map of Proposed Study Roadway Segments/Intersections *(If LMA is required)*	☐ Attached

Vehicle Miles Traveled (VMT) Screening

1.

Trip Type	Total	AM Peak Hour	PM Peak Hour
Daily Trips			
Pass-By Trips			
Internal Capture			
Previous Use Credits			
Net Daily Trips			

Project Generates ***Less than 110 Daily Vehicle Trips***? ☐ Yes ☐ No

2. Project is a Public/Community-Serving Facility, Retail, Bike, Pedestrian or Transportation Project Excluded from VMT Analysis? ☐ Yes ☐ No

3. Project ***Located in Low VMT Area (See Figures 8, 9 & 10)***? ☐ Yes ☐ No

4. **Project Screened from VMT Analysis?**
If "Yes" is checked for any of the criteria above, the project is screened out from further VMT Analysis. ☐ Yes ☐ No

Local Mobility Analysis (LMA) Screening

1. Project Generates ***Less than 800 Daily Vehicle Trips***? ☐ Yes ☐ No

2. **Project Screened from Local Mobility Analysis?**
If "Yes" is checked for criterion above, the project is screened out from further LMA Analysis. ☐ Yes ☐ No

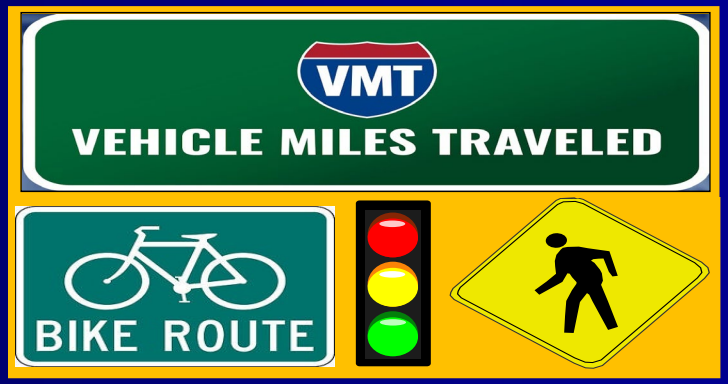
*If the project is required to complete an LMA, provide an attachment with a list or map of the proposed study roadway segments and intersections in accordance with the requirements outlined in **Sections 3.0 - 3.3** of these guidelines.*

Presentation to Planning Commission:

Implementation of

City of Imperial's Vehicle Miles Traveled (VMT) & CEQA Thresholds

June 12, 2024



Presented To:

CITY OF IMPERIAL



Presented By:

MINAGAR & ASSOCIATES, INC.



Introduction
CEQA, VMT & LOS



- **CEQA (California Environmental Quality Act):**
  - This act requires identification of any significant environmental impacts of state or local agency action, including discretionary approval of new development or infrastructure projects.
  - The process of identifying these impacts is typically referred to as the environmental review process.

Introduction
CEQA, VMT & LOS (cont'd)



- **VMT (Vehicles Miles Traveled)**
  - Refers to a metric that accounts for the number of vehicle trips generated and the length or distance of those trips.
  - Created the 2019 Amendments to CEQA Guidelines by the Natural Resources Agency, requiring all cities and counties and state agencies to develop a Vehicle Miles Traveled (VMT) based methodology for evaluating transportation impacts under the revised CEQA guidelines.

Introduction
CEQA, VMT & LOS (cont'd)



- **LOS (Level of Service)**
  - Refers to a metric that assigns a letter grade to network performance. The typical application of LOS in the City of Imperial is to measure the average amount of delay (in seconds) experienced by vehicle drivers at the intersection during the most congested time of day and to assign LOS from A to F.

VMT
Background



- **SB 743**
  - **The primary purpose of Senate Bill 743 was to change the primary methodology of Environmental Traffic Impact Analysis to revolve around the metric of VMT indexed to population and/or employment, as opposed to the previous methodology focusing on LOS to VMT.**
  - **The new analysis shifts from analyzing the environmental impacts of congested streets and/or intersections to the impact of vehicle trip lengths.**

VMT
Background (cont'd)



- **SB 743 (cont'd)**
  - **The methodology was developed to aid in reaching the Greenhouse Gas (GHG) emission goals passed in the California Global Warming Solutions Act of 2006 (Assembly Bill 32 or AB 32.)**
  - **In addition to the VMT metric, the City of Imperial will continue to utilize LOS Analysis methodology in the Local Mobility Analysis for all projects to ensure the safety and efficient City roadways.**

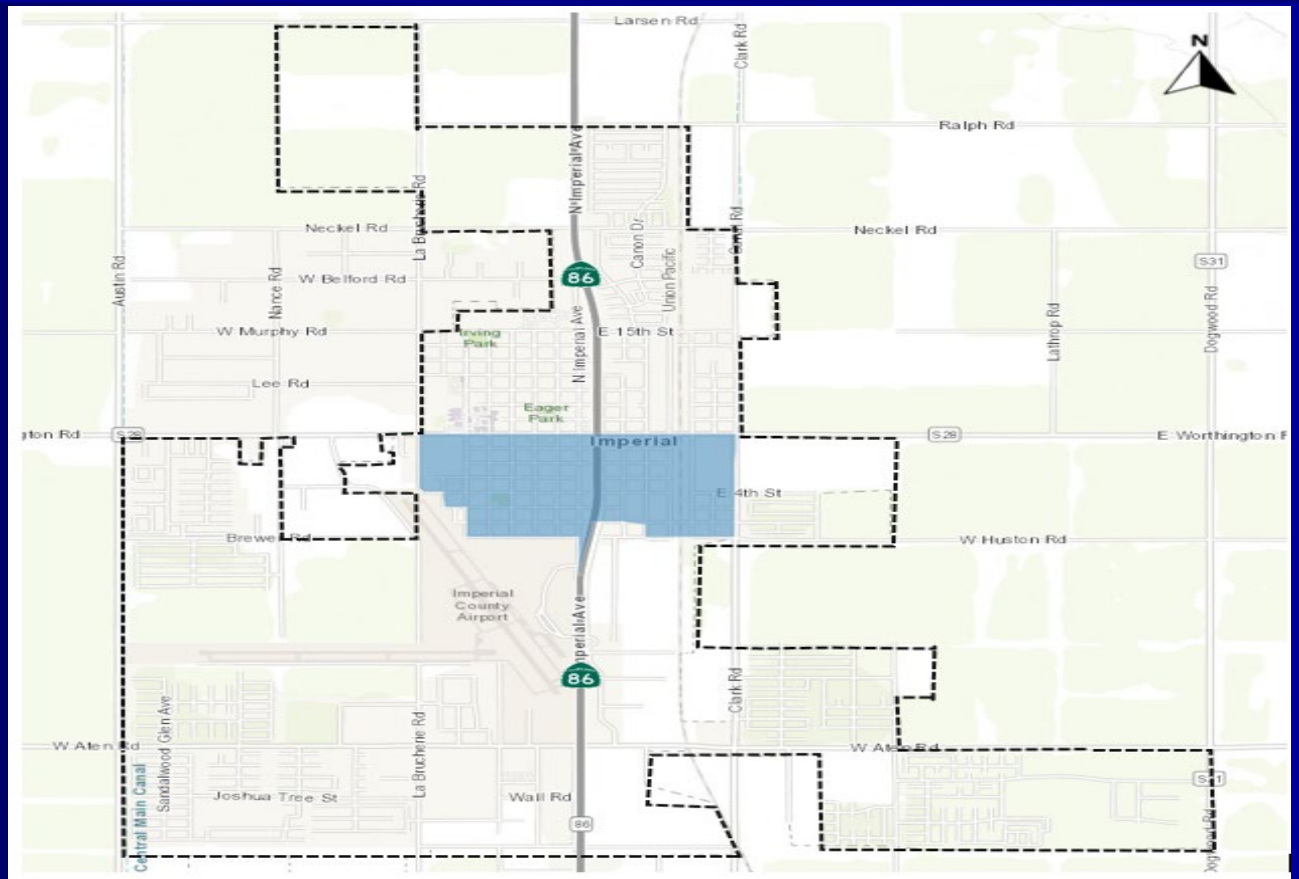
Implementation of VMT in Imperial (cont'd)



- **New to the City of Imperial**
  - The City's new **VMT Guidelines** are intended to identify potential VMT impact of a proposed development project and determine the need for any improvements or mitigations to the project or nearby road system.
  - Though the Guidelines focus primarily on VMT methodology, a section on **Local Mobility Analysis (LMA) Guidelines** has also been provided.

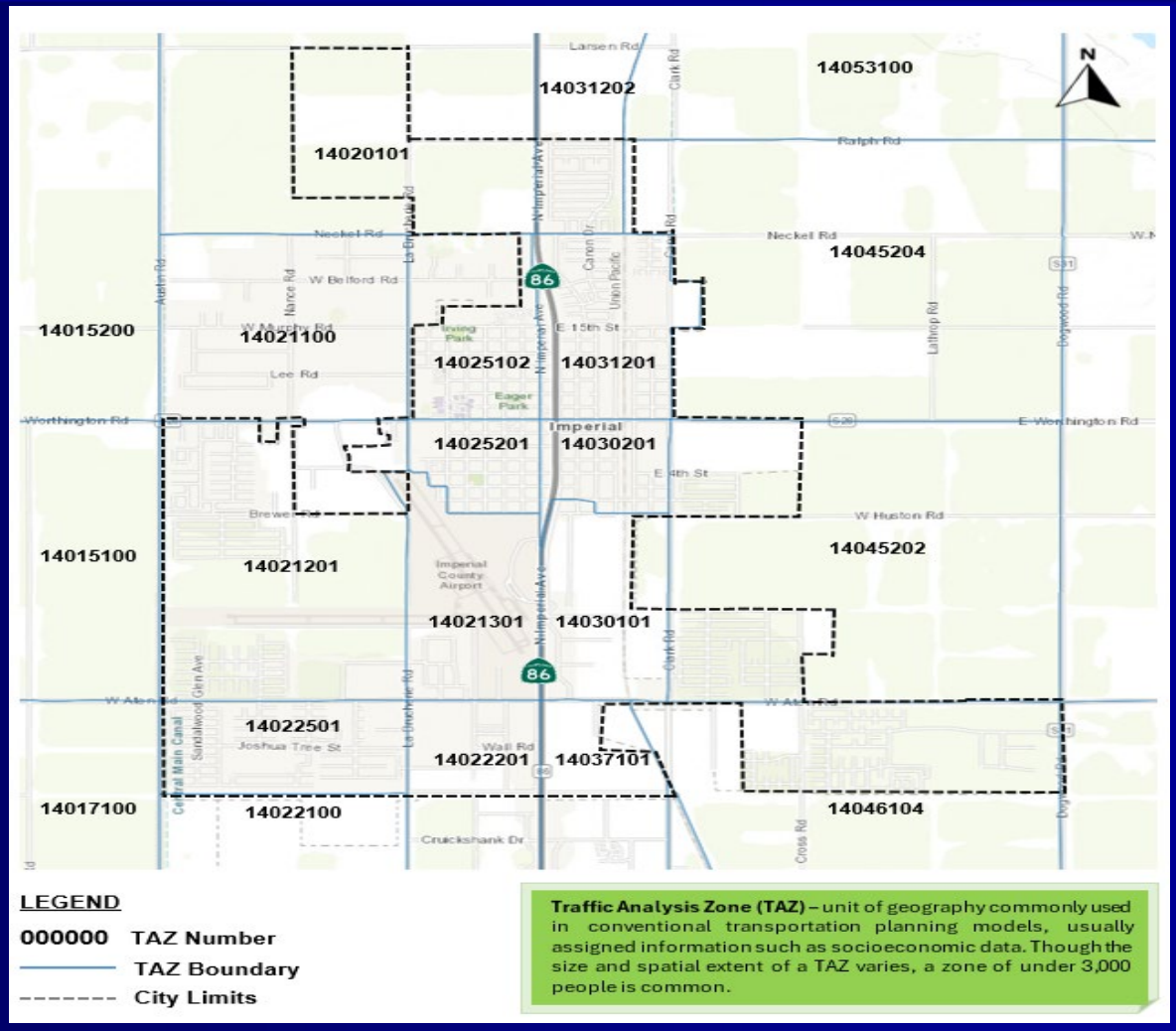
Implementation of VMT in Imperial

City of Imperial Neighborhood Mobility Areas (NMAs)



Implementation of VMT in Imperial

City of Imperial Traffic Analysis Zones (TAZs)



VMT Analysis Methodology



- **Screening Analysis**
  1. **Project Size**
  2. **Retail Nature**
  3. **Low VMT Area**
  4. **Transit Priority Area**

VMT Analysis Methodology



- **Screening Analysis:**
- **1. Project Size**
  - **If a project is found to generate fewer than 110 daily vehicular trips, it can be assumed that there is an insignificant VMT impact and the project is EXEMPT from further analysis. The 110 project trips is the threshold.**
  - **The following facilities are EXEMPT from this consideration:**
    - **Existing facilities**
    - **Additions to existing facilities where an addition is less than 10,000 SF in a location where public infrastructure is available and not environmentally sensitive**

VMT Analysis Methodology



- **Screening Analysis:**
- **2. Retail Nature: These Projects are Excluded from VMT Analysis**

Retail Projects

• Locally serving retail projects <50,000 square feet serving the local community
  ○ Example, gas stations
  ○ Restaurants
  ○ Commercial shops
  ○ Grocery stores

Public Facilities/Community Purpose Facilities	
• K-12 public schools	• Post offices
• Libraries	• Daycare centers
• Senior housing	• Assisted living facilities
• Affordable housing projects	• Student housing on/adjacent to college campuses
• Police and fire facilities	• Parks and trailheads

• Government offices
  ▪ Example, City Clerk office
  ▪ Parks & Recreation office
	• Passive public uses
	  ▪ Example, Water sanitation
	  ▪ Waste management

Other public uses as determined by the City	

Transportation Projects	
• Transit projects	• Bike projects
• Pedestrian projects	• Safety improvement projects
• Safe Routes to School	

VMT Analysis Methodology



- **Screening Analysis:**
- **3. Low VMT Area**
  - **Residential projects can be EXEMPT from VMT Analysis if the project's VMT per capita is 15% or more below the average regional residential home-based VMT per capita.**
  - **Employment Projects can be EXEMPT from VMT Analysis if the project's VMT per capita is 15% or more below the average regional employee home-based VMT per employee.**

VMT Analysis Methodology

Low VMT TAZ Zones in the City of Imperial

VMT/Service Population

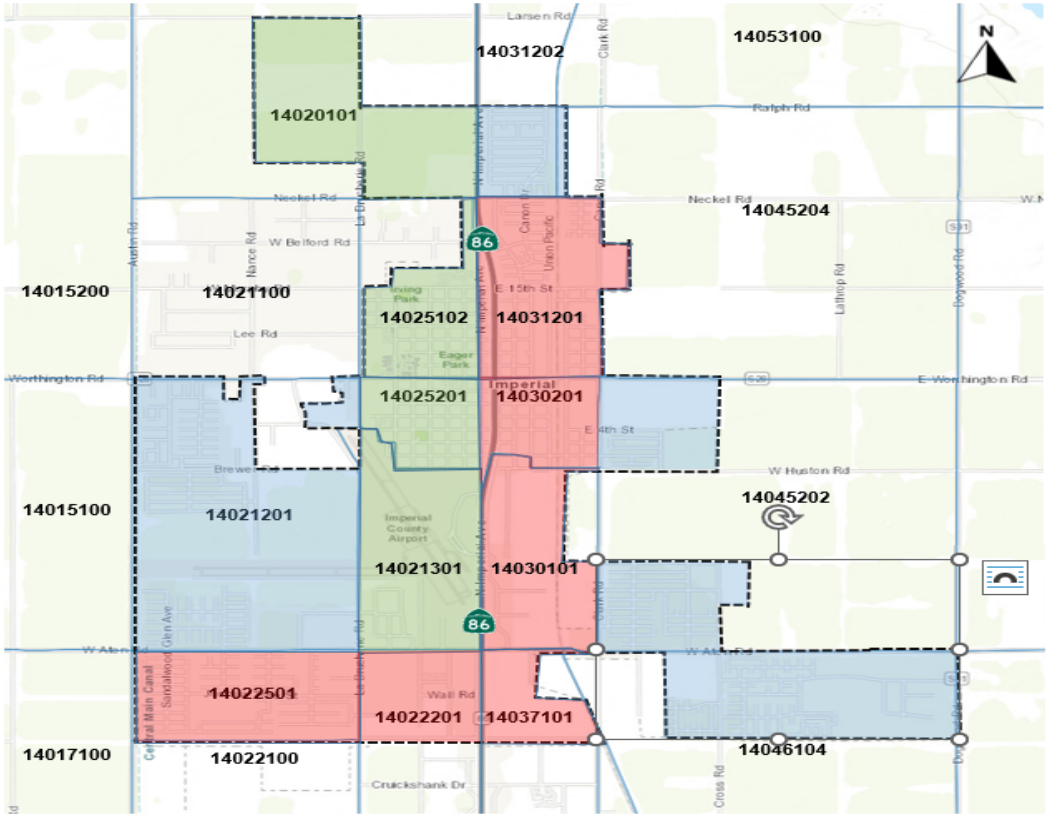


Figure 8: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (VMT/Service Population)

LEGEND

- *15% or More Below City Average*
- *0-15% Below City Average*
- *0-15% Above City Average*
- *15% or More Above City Average*

VMT Analysis Methodology

Low VMT TAZ Zones in the City of Imperial

Residential Home-Based VMT/Capita

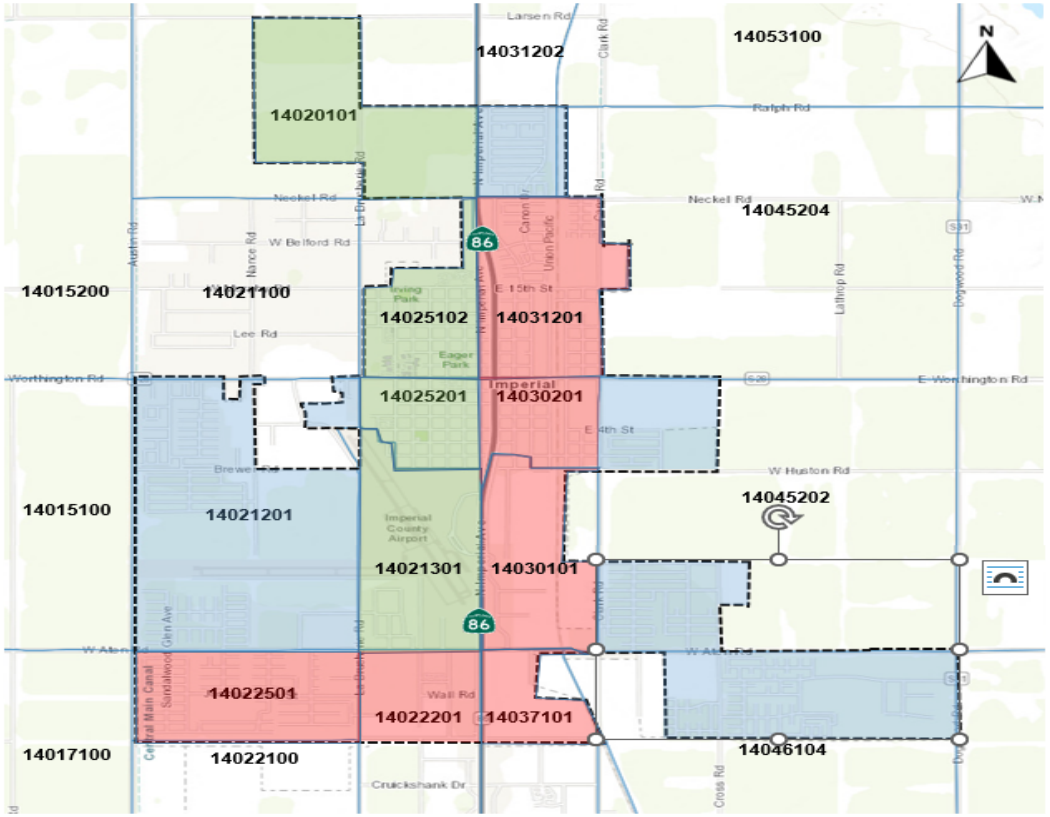


Figure 8: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (VMT/Service Population)

LEGEND

- *15% or More Below City Average*
- *0-15% Below City Average*
- *0-15% Above City Average*
- *15% or More Above City Average*

VMT Analysis Methodology

Low VMT TAZ Zones in the City of Imperial

Employee Home-Based VMT/Employee

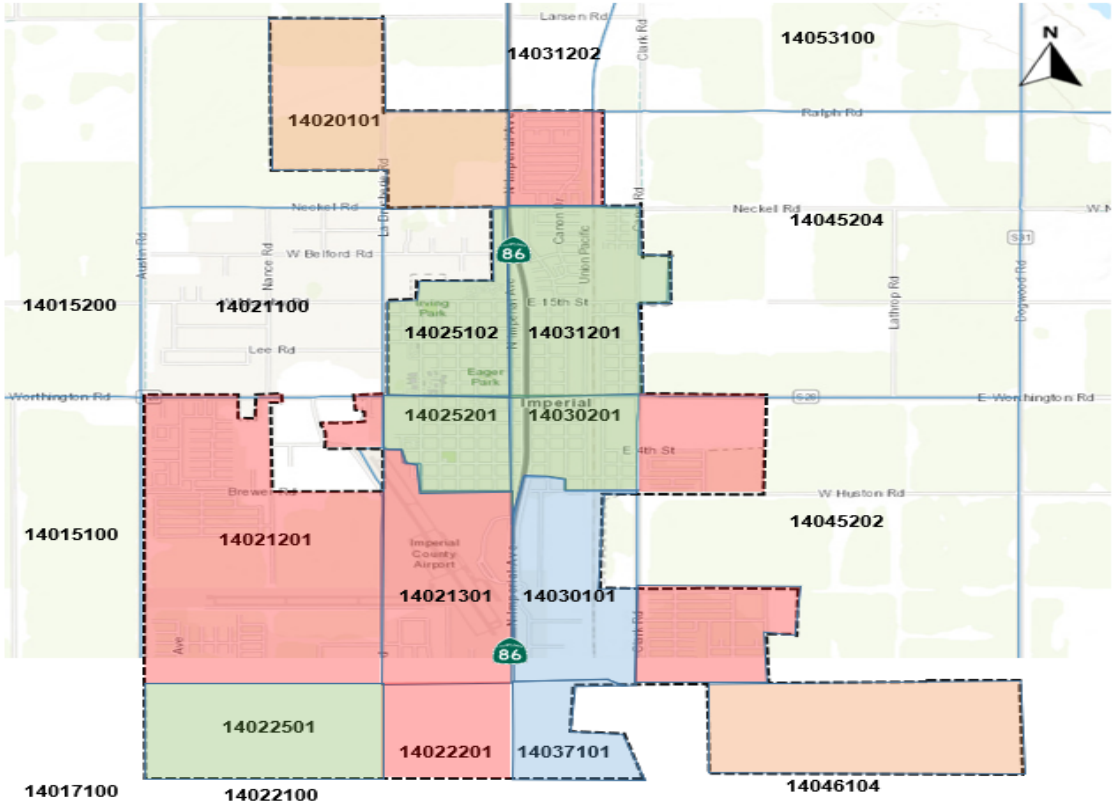


Figure 10: Low VMT Traffic Analysis Zones (TAZs) in the City of Imperial (2024) (Employee Home-Based VMT/Employee)

LEGEND

- *15% or More Below City Average*
- *0-15% Below City Average*
- *0-15% Above City Average*
- *15% or More Above City Average*

VMT Analysis Methodology



- **Screening Analysis:**
- **4. Transit Priority Area**
  - **Since the City of Imperial does not contain any HQ Transit Corridors per SCAG's maps, therefore, no developments will be screened through this criterion. See the following slide map.**

VMT Analysis Methodology

- Screening Analysis:
- 4. Transit Priority Area

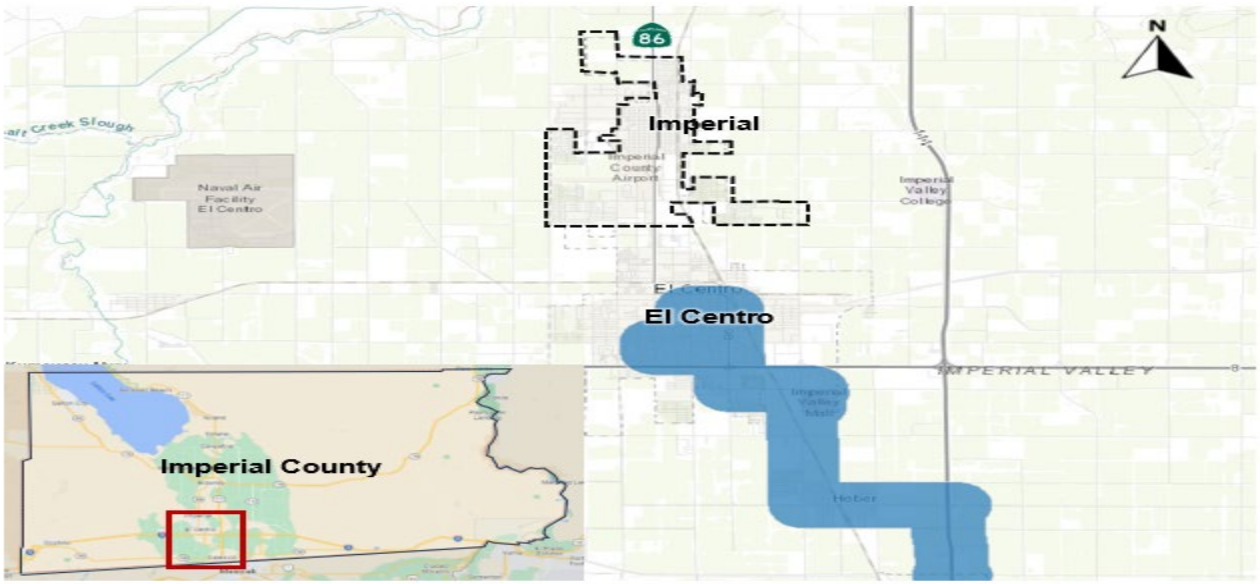
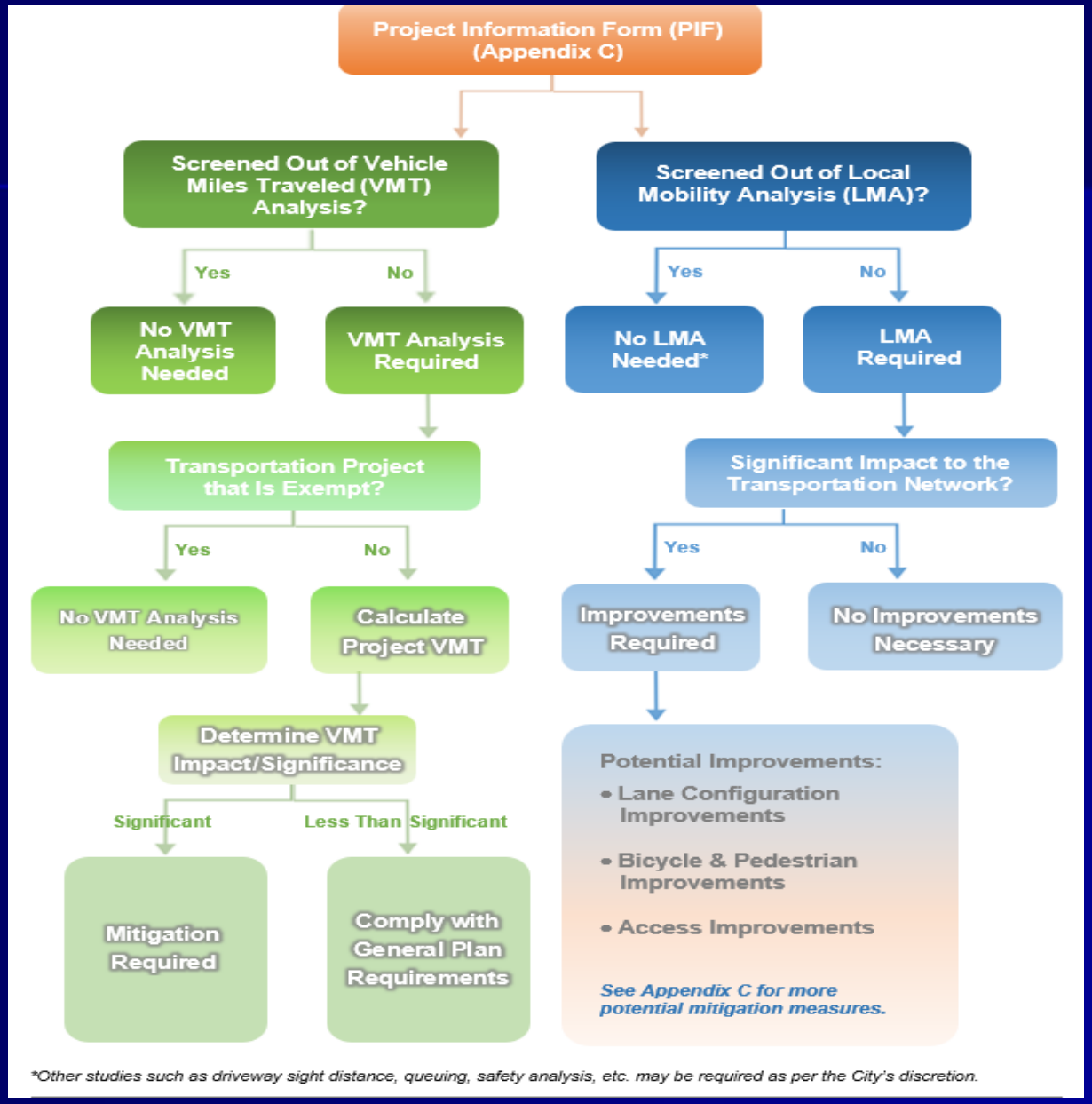


Figure 11: High Quality Transit Areas (HQTA) in Imperial County

VMT Analysis and LMA Flowchart



Implementation of VMT & CEQA Thresholds in the City of Imperial



Q/A

Staff Report

Agenda Item No. D-1

To: Traffic Commission

From: Othon Mora, Community Development Director

Date: June 4, 2024

Subject: Removal of Crosswalk on South Imperial Avenue, Between West 4th Street and West 5th Street, in Front of City Hall

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Background

The Community Development Department is currently engaged in a comprehensive effort to enhance and modernize our intermodal transportation infrastructure. This initiative aims to improve the overall connectivity and safety of various transportation modes within our community. As part of this initiative, we are assessing the potential removal of the crosswalk located on South Imperial Avenue, between West 4th Street and West 5th Street, directly in front of City Hall.

Importance of Safe Access

Ensuring that citizens have safe and convenient access to City Hall is a top priority. The crosswalk in question serves as a vital access point to the building, facilitating pedestrian movement across South Imperial Avenue. Additionally, sight visibility at this location is compromised due to the angle of the parking, making it difficult to see incoming traffic. As such, any decision regarding its removal must be approached with careful and thorough consideration to maintain or enhance pedestrian safety and accessibility.

Impact on Surrounding Areas

The removal of the crosswalk will not only affect pedestrians who currently use it to access City Hall, but also drivers and residents in the surrounding area. Key considerations include:

1. **Parking**:
    - **Potential Increase in Parking**: Removing the crosswalk could potentially free up space, allowing for the addition of parking spots along South Imperial Avenue. This would be beneficial for both visitors to City Hall and local businesses, addressing a common concern about limited parking availability in the area.

- **Legislative Impact**: Recent legislative changes, such as Assembly Bill 413, which bans parking within 20 feet of a crosswalk, will be a factor in determining the net impact on available parking spaces if the crosswalk is removed.

2. **Infrastructure Modifications**:

   - **Crosswalk removal:** Removing the crosswalk will necessitate removal of the existing ramp and installation of curb and gutter. The total estimated cost is $850.00

   - **Keep Crosswalk:** Currently, the crosswalk is non-compliant and requires a handicap ramp on the west side to meet ADA standards. The cost of constructing this ramp has been estimated at $4,995.00.

   - **Alternative Access Points**: There are existing accessible crossing points at the intersection of West 4th Street. This intersection is equipped with a handicap ramp and provides a viable alternative for pedestrians needing to cross South Imperial Avenue.

Community Feedback

As part of our assessment, we have collected feedback from the surrounding neighbors, summarized in Exhibit B. The majority of the neighbors are in favor of removing the crosswalk, citing benefits such as increased parking availability along South Imperial Avenue. Specific feedback includes:

- Emma Ruiz at 403 S Imperial Ave supports the removal for increased parking benefits.
- Guadalupe Bañuelos at 407 S Imperial Ave also supports the removal for the same reasons.
- Jose Lozoya at 413 S Imperial Ave does not oppose the removal but acknowledges the safety benefits of keeping it.
- Eduardo Payan at 419 S Imperial Ave favors removal but disagrees with adding more angled parking spaces.
- Paulina Bazan at 423 S Imperial Ave supports removal for increased parking benefits.

However, residents at 411 S Imperial Ave did not respond to our inquiries. Despite multiple attempts, we were unable to obtain their feedback.

This feedback reflects a general consensus among the neighbors that the removal of the crosswalk would positively impact parking availability and overall convenience for the community.

Additional Considerations

Another important factor to consider is parking. Through Assembly Bill 413, effective January 1, 2024, parking within 20 feet from a crosswalk is banned. This would mean eliminating three parking spaces on the east side of S Imperial Ave and also affect possible parking availability for the residents on the west side of S Imperial Ave.

Please refer to Exhibit A, attached herewith, which illustrates the location of the crosswalk to be removed, the intersections, and the affected parking spaces.

Environmental Compliance

The project is categorically exempt from the California Environmental Quality Act (CEQA) under Section 15301 (Class1)-Existing Facilities. Minor alteration to the existing street to enhance pedestrian safety.

Staff Recommendation

Based on these findings, staff recommends the removal of the crosswalk in front of City Hall on South Imperial Avenue between West 4th Street and West 5th Street.

EXHIBIT A

City Hall

Affected Parking

Affected Parking

Crosswalk

S Imperial Ave

S Imperial Ave

S Imperial Ave