3.14 Transportation

This section of the Draft EIR evaluates potential transportation impacts associated with the proposed Golden State Natural Resources Forest Resiliency Demonstration Project (proposed project). This section describes the existing transportation conditions at feedstock source locations (Sustainable Forest Management Projects), proposed pellet processing facility sites in Northern California (Lassen Facility) and the Central Sierra Nevada foothills (Tuolumne Facility), and the export terminal in Stockton, California (Stockton Terminal), and evaluates the potential for project-related transportation impacts, and considers proposed project design features that could reduce or eliminate associated impacts. Six (6) scoping comments were received regarding transportation in response to the Notice of Preparation (NOP) (see Appendix A).

3.14.1 Environmental Setting

3.14.1.1 Sustainable Forest Management Projects

Feedstock destined to the Lassen and Tuolumne facilities for manufacturing of wood pellets will be wood byproducts sourced from Sustainable Forest Management Projects such as hazardous fuel reduction projects, construction of shaded fuel breaks, and salvage harvests (see Chapter 2, Project Description, for a full description). The feedstock would originate from California's private, state, tribal, and federal timberlands located within the Working Area of the two wood pellet production facilities. Haul routes from the Sustainable Forest Management Projects to the production facilities are described below.

3.14.1.2 Northern California (Lassen Facility) Site

The following discussion provides an overview of the existing transportation setting throughout the study area.

Roadway Network

Site Access Roadways

The Lassen Facility Site is located southeast of Lassen State Highway (SR-299) and along the eastern edge of the community of Nubieber. Employee access to the site is provided via 4th Street to Washington Avenue and truck access is provided via Babcock Road.

State Route 299 (SR-299) – SR-299 is an east-west highway located north of the project site. SR-299 is a Caltrans designated truck route with primary access to the Lassen Facility and allows the use of both Surface Transportation Assistance Act (STAA) and California legal trucks. The posted speed limit is generally 55-65 miles per hour (MPH).

Washington Avenue – Washington Avenue is an east-west, two-lane, undivided roadway located west of the project site. Washington Avenue will provide primary personnel (passenger-car) access to the project site. There is no posted speed limit.[1]

Babcock Road – Babcock Road is an east-west, two-lane, undivided roadway located west of the project site. Babcock Road will provide truck access to the project site. There is no posted speed limit.

Adams Avenue – Adams Avenue is a north-south, two-lane, undivided roadway located west of the project site. Adams Avenue provides secondary personnel access to the project site. There is no posted speed limit.

Haul Routes

Although the exact haul routes to be used at any given time would vary widely depending on the feedstock areas, the following local and state highways would constitute the majority of expected haul routes throughout the Working Area. A brief description of each route is provided below, and all routes for the Lassen feedstock area are shown in Figure 3.14-1, Feedstock and Haul Routes – Lassen Facility.

State Route 139 (SR-139) – SR-139 is a north-south highway located northeast of the project site. SR-139 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks. South of Postmile Marker 43.3, SR-139 allows only trucks that are no longer than 65 feet as per the kingpin-to-rear-axle (KRPA) advisory. The posted speed limit is generally 55 MPH.

US Route 395 (US-395) – US-395 is a north-south highway located east of the project site. US-395 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks. The posted speed limit is generally 65 MPH.

State Route 89 (SR-89) – SR-89 is a north-south highway located west of the project site. SR-89 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks. A section of SR-89 runs through Lassen National Park, and this section is not a Caltrans truck route. Furthermore, the project's haul routes will not pass through this section of the highway. The posted speed limit is generally 55-65 MPH.

State Route 36 (SR-36) – SR-36 is an east-west highway located south of the project site. SR-36 is a Caltrans designated truck route and varies between allowing STAA trucks, 65 feet California Legal trucks, and 65 feet California KRPA advisory trucks. SR-36 allows STAA trucks from Red Bluff to Postmile Marker 64.0, and east of its junction with SR-147. SR-36 allows 65 feet California Legal trucks from Postmile Marker 39.7 to Postmile Marker 41.3, Postmile Marker 64.0 to Postmile Marker 75.2, and Postmile Marker 83.1 to the SR-147 junction at Lake Almanor. SR-36 allows 65 feet California KRPA advisory trucks from Postmile Marker 75.2 to Postmile Marker 83.1. The posted speed limit is generally 55-65 MPH.

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[1] For locations where there is no posted speed limit, Chapter 7. Speed Laws [22348 – 22431] of the California Vehicle Code (CVC) apply. Specifically:
- Per CVC Section 22349, the maximum speed limit for all California roadways is 55 mph on two lane undivided roadways and 65 mph on all other roadways.
- Per CVC Section 22352, prima facie limits [of 15 mph and 25 mph] are applicable unless changed as authorized in this code, and if so changed, only when signs have been erected giving notice thereof. A speed limit of 15 mph is applicable to uncontrolled railway crossings; blind, uncontrolled intersections; and alleyways. A speed limit of 25 mph is applicable to business and residential areas without other posted speed limits; school zones, and areas immediately around senior centers.

US Route 97 (US-97) – US-97 is a north-south, two-lane, undivided highway located northwest of the project site. US-97 connects I-5 to the Klamath Falls region and travels through Klamath National Forest. US-97 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks. The posted speed limit is generally 65 MPH.

Interstate 5 (I-5) – I-5 is an is a north-south, divided, four to eight-lane freeway located to the west of the project site. I-15 is a major interstate freeway that begins near the Mexico—US Border and extends to Alberta, Canada, and serves as a critical connection for many other regional roadways, freeways, and highways. Caltrans classifies I-5 as a designated truck route on the National Network (STAA). The posted speed limit is 65 MPH.

Transit

Transit in Lassen County is provided by Lassen Transit Service Agency (LTSA) which operates the Lassen Rural Bus, and has agreements with neighboring agencies for connecting services. The Lassen Rural Bus provides service with five routes: the Susanville City Route, the West County Route, the South County Route, the South County Commuter Route, and the Eagle Lake Route. There are no existing bus or transit routes that operate within a 1-mile radius of the project site. For additional reference, the Lassen Rural Bus routes, which primarily operate in and around the greater Susanville area, are described below.

The Susanville City Route provides service to local schools, government facilities, residential, and commercial areas within the city limit of Susanville. The route operates on weekdays from 7:00 a.m. to 7:00 p.m. with 60-minute headways. On Saturdays, the route operates from 8:00 a.m. to 4:00 p.m. with 60-minute headways.

The West County Route provides service between the cities and communities of Susanville, Westwood, Lake Almanor, and Chester (located in Plumas County). The route operates three times on weekdays: at 5:36 a.m., 12:10 p.m., and 5:15 p.m. The route operates twice on Saturdays at 8:20 a.m. and 3:00 p.m.

The South County Route provides service between the communities of Herlong, Janesville, Standish, Litchfield, Leavitt Lake, Johnstonville, and Susanville. The route operates twice a day on weekdays and Saturdays at 6:30 a.m. and at 3:00 p.m.

The South County Commuter Route provides service between the communities of Susanville, Janesville, Milford, and Herlong. The route operates twice a day on weekdays, at 5:00 a.m. and 5:00 p.m. A majority of the stops are restricted to the public, so riders must call in advance to schedule stops as needed. Additionally, the route is subject to year-round closures due to high winds and inclement weather.

The Eagle Lake Route provides service along the west side of Eagle Lake and between Susanville during summer months. The route operates twice a day only on Saturdays at 10:00 a.m. and 3:00 p.m. This route is available only by appointment, and riders must specify a designated pick-up location in their reservation.

Lassen Rural Bus also operates Dial-A-Ride which provides complementary paratransit service throughout Lassen County. Dial-A-Ride operates on weekdays from 7:00 a.m. to 6:50 p.m., and on Saturdays from 8:00 a.m. to 3:50 p.m. LTSA also partners with Big Valley 50 Plus, Lassen Senior Services, Sage Stage, Lassen College, and the Far Northern Regional Center to provide riders from the respective communities with service.

Pedestrian and Bicycle Facilities

There are currently little to no pedestrian or bicycle facilities provided near the project site or within the community of Nubieber. The Caltrans District 2 Active Transportation Plan (ATP) (Caltrans 2022) identifies the needs for improvements throughout Lassen County, and additional pedestrian or bicycle facilities may be provided in the future; however, the ATP currently identifies the segment of SR-299 along the project site's frontage as a "Tier 3" Highway Segment, which indicates low relative priority for pedestrian and/or bicycle facility improvements. Additionally, this location was not identified to include a need through local public engagement per the ATP. The Lassen County Regional Transportation Plan (RTP), prepared for the Lassen County Transportation Commission (LCTC) (LCTC 2023), identifies SR-299 along the project site's frontage as a proposed Class II Bike Lane.

Rail

The Lassen facility is bordered on its eastern side by the Burlington Northern Santa Fe Railway (BNSF). BNSF serves the site, and other commercial properties in Nubieber, with an existing railway siding that crosses the project site from east to west. The main line is owned and operated by BNSF from the project site to Keddie, in Plumas County, at which point the track is owned by Union Pacific Railroad (UPRR), but BNSF has trackage rights to Stockton.

Rail traffic counts indicate an average of 4 freight trains per day pass through Nubieber (a daily average of 5 including locomotives with no freight cars), with an average length of 69 rail cars, up to a maximum of 100 rail cars (NDS 2023).

3.14.1.3 Central Sierra Nevada (Tuolumne Facility) Site

The following discussion provides an overview of the existing transportation setting throughout the study area.

Roadway Network

Site Access Roadways

The Tuolumne Facility Site is located south of State Route 120 (SR-120) and north of the unincorporated community of Keystone in Tuolumne County. Employee access to the site is provided via La Grange Road and the northern site access driveway and truck access the site is provide via the southern site access driveway.

State Route 120 (SR-120) – SR-120 is an east-west, two-lane undivided highway located north of the project site. SR-120 is a Caltrans designated truck route; in Tuolumne County, SR-120 has terminal access, and allows the use of both STAA and California legal trucks. In Mariposa County, SR-120 allows only trucks that are no longer than 65 feet as per the kingpin-to-rear-axle (KRPA) advisory. The posted speed limit is generally 55-65 MPH.

La Grange Road – County Road J59 (CR-J59) – La Grange Road is a north-south, two-lane, undivided roadway located along the western edge of the project site. La Grange Road will provide primary personnel access to the project site. The posted speed limit is 55 MPH.

Yosemite Boulevard – State Route 132 (SR-132) – SR-132 is an east-west, two-lane, undivided highway located south of the project site. SR-132 is a Caltrans designated truck route; west of the City of Modesto, SR-132 has terminal access, and allows the use of both STAA and California legal trucks. East of the City of Modesto, SR-132

allows only trucks that are no longer than 65 feet as per the California Legal Route. The posted speed limit is 45 MPH.

Red Hill Road – Red Hill Road is a north-south, two-lane, undivided, and unstriped roadway located northeast of the project site. There are no present sidewalks, or curbs, and the use of trucks heavier than 25 tons is prohibited. The posted speed limit is 25 MPH.

Montezuma Road – State Route 49 (SR-49) – SR-49 is a north-south, two-lane, undivided highway located northeast of the project site. SR-49 is identified as Montezuma Road from Postmile Marker (PM) 16.276 south of Chinese Camp to PM 11.587 at its intersection with SR-108. SR-49 provides regional access to the project site, and is a Caltrans designated truck route, wavering between a STAA and 65-foot California Legal Route with and without KPRA advisory. East of the Lassen Facility, SR-49 is an STAA route between its junction with SR-120 at PM 23.9 to Ponderosa Drive in Sonora (PM 17.3), and a 65-foot California Legal Route with KPRA advisory of 30 feet north from Ponderosa Drive to its junction with SR-4 in Angels Camp. The posted speed limit is generally 65 MPH.

Site Access Driveways – The site access driveways provide direct access to project site. The northern driveway, which is currently unpaved and not operational, will be improved and serve as the primary employee access to the site. The southern driveway, which is currently paved and operational, will provide primary truck access to the project site.

Haul Routes

Although the exact haul routes to be used at any given time would vary widely depending on the feedstock areas, the following local and state highways would constitute the majority of expected haul routes throughout the Working Area. A brief description of each route is provided below, and all routes for the Tuolumne feedstock area are shown in Figure 3.14-2, Feedstock and Haul Routes – Tuolumne Facility.

US Route 50 (US-50) – US-50 is an east-west, two- to four-lane highway located north of the project site. US-50 is a Caltrans designated truck route; west of Postmile Marker 31.3 it is part of the National Network, and allows the use of both STAA and California legal trucks. East of Postmile Marker 31.3, US-50 allows only 65 feet California Legal trucks. The posted speed limit is generally 55-65 MPH.

State Route 88 (SR-88) – SR-88 is an east-west highway located north of the project site. SR-88 is a Caltrans designated truck route that varies between allowing trucks with terminal access and trucks that are 65 feet maximum in length. SR-88 allows STAA trucks from Stockton to Amador City, and from Postmile Marker 2.2 to its eastern terminus, and it allows only 65 feet California Legal trucks between Amador City and Postmile Marker 2.2. The posted speed limit is generally 55 MPH.

State Route 4 (SR-4) – SR-4 is an east-west highway located north of the project site. SR-4 is a Caltrans designated truck route that varies between allowing trucks with terminal access and trucks that are KPRA advisory sized. SR-4 allows STAA trucks from Stockton to Postmile Marker 8.1, and from its junction with SR-49 to Postmile Marker 3.0, and it allows only KPRA advisory sized trucks between Postmile Marker 8.1 to its junction with SR-49, and from Postmile Marker 3.0 to its eastern terminus. The posted speed limit is generally 55 MPH.

State Route 108 (SR-108) – SR-108 is an east-west highway located north of the project site, and overlaps with SR-120 from Oakdale to Yosemite Junction. SR-108 is a Caltrans designated truck route with terminal access, and

allows the use of both STAA and California legal trucks. From Postmile Marker 31.3 to its eastern terminus, SR-108 allows only KPRA advisory sized trucks. The posted speed limit is generally 55 MPH.

State Route 140 (SR-140) – SR-140 is an east-west highway located south of the project site. SR-140 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks. The posted speed limit is generally 55-65 MPH.

State Route 41 (SR-41) – SR-41 is a north-south highway located south of the project site. SR-41 is a Caltrans designated truck route with terminal access, and allows the use of both STAA and California legal trucks, except for a small portion from Postmile Marker 45.7 to its northern terminus in Fresno County. The posted speed limit is generally 55 MPH.

State Route 168 (SR-168) – SR-168 is an east-west highway located south of the project site. SR-168 is a Caltrans designated truck route that varies between allowing trucks with terminal access, 65 feet California Legal trucks, and trucks that are KPRA advisory sized. SR-168 allows STAA trucks from Fresno to Postmile Marker 18.6, allows only KPRA advisory sized trucks between Postmile Marker 36.6 to Postmile Marker 49.7, and allows only 65 feet California Legal trucks from Postmile Marker 18.6 to Postmile Marker 36.3, and from Postmile Parker 49.7 to its eastern terminus. The posted speed limit is generally 55-65 MPH.

Transit

Transit in Tuolumne County is provided by Tuolumne County Transit (TCT) which currently operates two bus routes and a Dial-A-Ride service. There are no existing bus or transit routes that operate within a 1-mile radius of the project site, or near the community of Keystone. However, for additional reference, the Tuolumne County Transit routes are described below.

The two TCT routes operate only on weekdays whereas the Dial-A-Ride service is available on Mondays through Saturdays. Route 1 provides service mainly within the Sonora and East Sonora communities, and operates from 7:30 a.m. to 7:30 p.m., with 60-minute headways. Route 2 provides service between the Columbia, Shaws Flat, Sonora, Crystal Falls, Sugar Pine, and Sierra Village communities, and operates five buses at 6:25 a.m., 9:30 a.m., 11:00 a.m., 1:30 p.m., and 4:40 p.m. The Dial-A-Ride service is reservation based and has an expansive service area throughout Tuolumne County; however, it does not service the project site area.

Pedestrian and Bicycle Facilities

There are currently little to no pedestrian or bicycle facilities provided near the project site. The 2020 Tuolumne County Active Transportation Plan (ATP) (TCTC 2020) has identified the need for improvements in the area under Project Numbers ATP-County06 and ATP-County07 for SR-108 and SR-120, respectively, which both include installation of bikeways with 4- to 8-foot shoulders and buffers throughout Tuolumne County along these roadways, including the extent adjacent to the project site. These facilities are identified as “Tier 2” improvements as prioritized by the Tuolumne County Transportation Commission (TCTC), indicating improved facilities have received either community and/or local agency support, but would likely require more community outreach and project information prior to implementation.

Rail

The Tuolumne facility is served by the Sierra Northern Railway (SERA). SERA owns and operates the track from the project site to Riverbank, at which point BNSF takes over as the carrier west to the Port of Stockton. Rail traffic counts were conducted within the City of Riverbank, near Patterson Road between Claus Road and Central Avenue. This point was selected as it is the point where westbound SERA traffic merges with the BNSF. Observed rail traffic indicates an average of 5 freight trains per day (a daily average of 7 including locomotives with no freight cars), with an average length of 9 rail cars, with a high of 26 rail cars (NDS 2023). Federal Rail Administration crossing data shows considerably more train traffic. The Patterson Road at-grade grade crossing (DOT #028767V) showed 16 daytime crossings and 16 night time crossings. Of the 32 trains, 12 were passenger trains, with the balance being freight trains (FRA 2023a).

3.14.1.4 Port of Stockton

Roadway Network

As discussed in Section 2.7, finished pellets would be transported by rail from both the Lassen and Tuolumne facilities to the Port of Stockton, California. The proposed GSNR facility would be located in the West Complex of the Port, formerly known as Rough and Ready Island.

Regional vehicle access to the West Complex is provided by the Navy Drive Bridge and a parallel rail bridge on the west side, connecting to the main port, and the Port of Stockton Expressway Bridge to the south – the Expressway ultimately connects to Highway 4. The proposed GSNR facility would be located in the northwest quarter of the West Complex, on a relatively undeveloped site bordered by Davis Avenue, Boone Drive, Edwards Avenue, and Lipes Drive.

Port of Stockton Expressway Bridge (Highway 4) – The Expressway Bridge is an extension of Highway 4 that stretches from I-5 to Navy Drive. The Bridge is an east-west, four-lane, undivided roadway, and is designated as a Freeway in the City of Stockton General Plan Circulation Element. The posted speed limit is 65 MPH.

Navy Drive – Navy Drive is an east-west, two- to four-lane roadway that extends from the I-5/Charter Way interchange into the West Complex of the Port of Stockton and the proposed GSNR facility, serving as the primary truck route and point of entrance into the West Complex. Navy Drive is designated as an Arterial in the City of Stockton General Plan Circulation Element. The posted speed limit is 35 MPH.

Fyffe Street – Fyffe Street is an east-west, two-lane, undivided roadway that stretches from Navy Drive and to the west across the southern extent of West Complex. Fyffe Street provides access to James Drive and Davis Street into the proposed GSNR facility, and is identified as a Collector in the City of Stockton General Plan Circulation Element. The posted speed limit is 35 MPH.

Transit

Transit in the City of Stockton is provided by San Joaquin Regional Transit District (RTD) which currently operates throughout the City of Stockton, Escalon, Ripon, Manteca, Lathrop, Tracy, and Lodi. There are no existing bus or transit routes that operate within a 1-mile radius of the project site within the Port. The nearest bus stop is located approximately 2-miles from the proposed GSNR facility, along Los Angeles Avenue, between Sonora Street and Hazelton Avenue, serving SJRTP Route 515. Route 515 extends from the City of Stockton Downtown Transit Center

(DTC) to the Marshall Elementary School to the south, and to the Washington Elementary School, located just north of the Port of Stockton Expressway Bridge.

Pedestrian and Bicycle Facilities

There are currently little to no pedestrian or bicycle facilities located along the proposed GSNR facility frontage as the land adjacent and around the site is currently undeveloped, or generally within the Port of Stockton. The nearest bicycle facilities include Class I bike paths north of the Stockton Deep Water Channel and south of Charter Way along the San Joaquin River Levee Road, as well as a Class II bike lane along Lincoln Street east of I-5 (City of Stockton 2018).

Rail

The Port of Stockton is served by Class I mainline carriers (BNSF and UPRR) and a Class III short line carrier, Central California Traction Company (CCTC). BNSF operates the Stockton Intermodal Facility on the southeast edge of the City, and UP operates a major intermodal facility and other terminal operations in Lathrop, California. In northern California, the Martinez Subdivision, Feather River Canyon, and Donner Pass routes serve the ports of Oakland and Stockton and are owned and dispatched by UPRR but serve BNSF through trackage right agreements.

CCTC is the short line operator for the Port. CCTC is jointly owned by BNSF and UPRR and operates 52 miles of freight service between Stockton and Lodi. CCTC connections are made with BNSF, UPRR, and the Stockton Terminal and Eastern Railroads, which runs from Stockton to Linden. The Port provides its own internal railway system with CCTC handling all switching and local movements within the Port; however, some tracks are owned and maintained by their respective customers (Anchor QEA LLC 2023).

The environmental analysis prepared for the *Port of Stockton Rail Bridge Replacement and Rail Improvement* Project (Anchor QEA LLC 2023) described 21 weekly train trips at the West Complex. However, prior to 2019, FRA rail crossing data shows 5 daily train trips (4 daytime, 1 night) within the West Complex at Fyffe Street (DOT #752931R), with an additional 2 switching trains per day (FRA 2023b). To provide context for overall Port rail activity, FRA data shows 10 daily crossings (6 day and 4 night), plus an additional 8 switching trains, at W. Washington Avenue (FRA 2019). The W. Washington Ave. line is operated by CCTC. Looking further east, the FRA data shows 16 daily crossings (8 daytime and 8 night) at the BSNF line at S. Lincoln Street, and 10 daily crossings (FRA 2023c).

3.14.2 Regulatory Setting

3.14.2.1 Federal

United States Department of Agriculture Forest Service

The California Department of Agriculture (USDA) Forest Service maintains roadways within the feedstock acquisition area. Commercial Use of Forest Development Roads is regulated under the authority of Title 36 of the Code of Federal Regulations. Per Regional Forester Order 98-2, use of a National Forest System Road or Forest Development Road for commercial hauling is prohibited without a permit or written authorization. Commercial vehicle activity subject to a Road Use Permit would include logging trucks, as well as other vehicles, including but not limited to, tractor-trailer combinations, lowboys, yarders, chip vans, sand, gravel, or cement trucks.

3.14.2.2 State

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which created a process to change the way transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation/traffic impacts. Under the new transportation guidelines, LOS or vehicle delay, is no longer considered an environmental impact under CEQA. Amendments to the CEQA Guidelines required under SB 743 were approved on December 28, 2018, and the new section 15064.3 identifies vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts under CEQA and is currently being implemented as of July 1, 2020.

Related legislation, SB 32 (2006) requires California to reduce greenhouse gas emissions 40% below 1990 levels by 2030. The California Air Resources Board has determined that it is not possible to achieve this goal without reducing VMT growth and specifically California needs to reduce per capita VMT across all economic sectors. SB 743 is primarily focused on passenger-cars and the reduction in per capita VMT as it relates to individual trips.

The OPR Technical Advisory (OPR 2018) provides guidance and tools to properly carry out the principles within SB 743 and how to evaluate transportation impacts in CEQA. Specific County guidance and thresholds are discussed in Section 3.14.2.3, where applicable.

California Department of Transportation

The California Department of Transportation (Caltrans) manages the state's highway facilities. Caltrans is responsible for constructing, enhancing, and maintaining the state highway and interstate freeway systems. Any change to the state roadway system requires an encroachment permit from Caltrans. As the owner and operator of the State Highway System, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact state highway facilities.

To comply with SB 743 implementation, the Caltrans Transportation Impact Study Guide (Caltrans 2020a), replaced the Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Per the 2020 Transportation Impact Study Guide, Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses. Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018). In addition to VMT, Caltrans has developed an Interim Local Development and Intergovernmental Review Safety Review Practitioners Guidance (December 2020) which may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the State Highway System and connections with the State Highway System (Caltrans 2020b). To comply with this requirement, an assessment of queuing at study area intersections with Caltrans roadways has been included in the EIR.

California Public Utilities Commission (PUC)

The Public Utilities Commission of the State of California (PUC) includes Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings pursuant to General Order (G.O.) No. 75-D, adopted August 24, 2006; effective September 23, 2006. Development of the Tuolumne Facility Site would include the

paving and reopening of an existing driveway (currently gated and overgrown) for employee vehicle access located at the northwestern corner of the site. This crossing would occur on privately-owned land, and would be subject to Section 7 (Private At-Grade Crossings) of G.O. No. 75-D, which includes the following regulations:

7. Private at-grade crossings

7.1. Pursuant to Public Utilities Code Section 7537, the Commission has the authority to determine the necessity for any private at-grade crossing and the place, manner, and conditions under which the at-grade crossing shall be constructed and maintained, and to fix and assess the cost and expense thereof. The Commission exercises such jurisdiction when it is either petitioned by one of the parties or Commission staff.

7.2. The establishment of a private at-grade crossing, other than a private at-grade crossing of the railroad tracks by the owning railroad, must be authorized through a written agreement between the railroad and the party requiring the crossing.

7.3. Standard 1-X. "PRIVATE CROSSING" sign shall be installed at all private at-grade crossings. See Figure 6 for additional specifications.

7.4. At all approaches to private at-grade crossings there shall be installed either a STOP sign (defined as a Standard R1-1 in the CA MUTCD) or an automatic warning device described in Sections 6.2 through 6.6.

a) If a STOP sign is used, the Standard 1-X sign shall be mounted on the post below it.
b) If a Standard 8, 8-A, 9, 9-A, or 9-E device is used, the Standard 1-X sign shall be attached to the mast of the warning device below the flashing light signals.

7.5. The language contained in the lower portion of the "PRIVATE CROSSING" sign shown in Figure 6 (in Public Utilities Code Section 7537), commencing with, and including the words "No Trespassing", shall be permitted at the option of the railroad.

3.14.2.3 Local

Lassen County

Lassen County General Plan

The Circulation Element of the Lassen County General Plan (Lassen County 1999) provides the framework for decisions in Lassen County concerning the countywide transportation system, and includes the general location and extent of the existing and proposed major thoroughfares, transportation routes, terminal, and other local public utilities and facilities. The Circulation Element is also intended to support the goals, objectives, policies, and proposals of the Land Use Element. Specific goals and policies identified in the Circulation Element that are relevant to the proposed project are identified below.

Goal C-1. A comprehensive, efficient and safe transportation system to serve the needs of County residents and to stimulate the economic progress of the County.

Policy CE-1. Designated major circulation routes are indicated on the enclosed Lassen County Circulation Map. This map has been prepared after consideration of and in correlation with the Land Use Element of the General Plan. Local roads are not indicated in this element.

Policy CE-2. The County shall pursue receipt of funds from the California Transportation Commission and the local transportation planning agency to help maintain the County Road System.

Policy CE-3. Encourage city, state, and Federal agencies to consult with the County in the planning of major roads projects, and to adequately maintain their road systems to serve recreationists and people and businesses who rely upon the use of resources on or near public lands in Lassen County. The County may consider the acceptance of Federal Forest Roads into the County-maintained road system when such roads are planned and developed in consultation with the County.

Policy CE-6. The County shall continue to review and, when warranted, formulate improved standards for the necessary improvement and maintenance of roads serving new development, including standards for the incremental improvement or development of public roads.

Policy CE-10. In consideration of proposed projects which would generate a substantial number of large trucks carrying heavy loads, the County shall require special mitigation measures to ensure that those projects do not cause, or will adequately mitigate, significant deterioration of County roads.

Policy CE-C Pursuant to impacts evaluated in an environmental impact report or other form of project review, the County may require mitigation measures which will insure that project developers adequately and fairly compensate or participate with the County in the necessary upgrading and/or repair of the affected roads.

Policy CE-12. No public highway or roadway should be allowed to fall or exist for a substantial amount of time at or below a Level of Service rating of "E"

Lassen County Regional Transportation Plan (2023-2043)

The Lassen County Regional Transportation Plan (RTP) was prepared for the Lassen County Transportation Commission (LCTC) to identify future transportation improvement projects and funding throughout the County (LCTC 2023). As noted in Section 3.14.1.2, the RTP identifies proposed Class II Bike Lanes along SR-299 adjacent to the project site's frontage. Additionally, the RTP provides general regional transportation goals and proposed transportation improvement projects consistent with those goals. The applicable major goals listed in the RTP are identified below and reviewed in Section 3.14.4.

Goal 1. Develop and maintain a comprehensive, efficient, and safe transportation system to serve the needs of County residents and to stimulate the economic progress of the County.

Goal 2. To provide adequate cost-effective public transit services, especially to accommodate the needs of the elderly and handicapped.

Goal 3. Promote the continuous flow of goods in, out of, and through the County in a safe and economically efficient manner.

Goal 5. Provide a safe and efficient bicycle and pedestrian circulation system that takes advantage of the natural scenery and physical characteristics of Lassen County.

Goal 6a. Minimize traffic congestion by increasing the efficiency of the existing transportation system through Transportation System Management (TSM) techniques.

Goal 6b. Where feasible, reduce the demand for travel by Single Occupant Vehicles (SOVs) through Transportation Demand Management (TDM) techniques.

Goal 7. Reduce GHG emissions from transportation-related activities within the Lassen County boundaries to support the state's efforts under AB-32 and to mitigate the impact of climate change.

Caltrans District 2 Active Transportation Plan (ATP) 2022

Caltrans developed a Caltrans District 2 Active Transportation Plan (ATP) 2022, with input from each county, including Lassen County. There are no specified routes planned, but the ATP outlines needs for the Lassen community. The ATP identified the need for sidewalk improvements along main roadways, improvements for pedestrian and bicycle crossings, and freeway crossings. Caltrans anticipates an update to the ATP in 2024 to align with Complete Streets targets for the 2024 State Highway Operations and Protection Program.

Lassen County Code

The following standards are included in the code, and would be applicable to any improvements to public roadways for access to the project site.

Section 16.32.090. Street requirements and definitions

(3) Paved Rural Streets. Paved rural streets shall be required:

(A) Where it is anticipated that, due to the General Plan designation of the property or lands in the area, the ultimate road standard necessary to serve the area would be a paved street; or

(B) For divisions of property where more than ten parcels are, or will be, served by the access road for the project.

Construction of paved rural streets shall be in conformance with the standards for Road Section Number 3, as illustrated in the diagram below, and will be considered for acceptance into the county maintained road system.

(4) Unpaved Rural Streets. This classification of roadway is intended to serve projects which are located in areas where it is determined by the approving body, through the discretionary consideration of the project, that it is not necessary to improve the road to a paved standard. Unpaved rural streets shall meet all of the following requirements:

(A) Unpaved rural streets shall be permitted for divisions of property where ten or fewer existing or proposed parcels will be served by the access road after recordation of the final map, parcel map or parcel map waiver.

(B) The required width shall be determined by the approving body, in accordance with the following:

(i) When it is not anticipated that the future density of property or the surrounding area would require improvement of the roadway to a paved standard, a twenty-six-foot width shall be applied.

(ii) When the approving body determines that there is a reasonable possibility that the roadway will require improvement to a paved standard, a twenty-eight-foot width shall be applied, pursuant to the standards set forth in this chapter.

Tuolumne County

Tuolumne County General Plan

The Transportation Element of the Tuolumne County General Plan (County of Tuolumne 2018) provides the framework for decisions in Tuolumne County concerning the countywide transportation system. Specific goals and policies identified in the Transportation Element that are relevant to the proposed project are identified below.

Goal 4A. Preserve the County's substantial investment in the existing road system and provide for the long-range planning and development of the County's transportation system for the safe and efficient movement of people and goods.

Policy 4.A.1. Support and work with the TCTC to regularly conduct assessments of the current status of the highway system to determine the current level of needs in the system, and report those needs to the Board of Supervisors.

Policy 4.A.a. Plan, design and regulate roadways in accordance with the following functional classification system and designations which are reflected in the County's Regional Transportation Plan, and are shown on the Master Plan of Streets and Highways in Chapter 4 of the General Plan Technical Background Report:

- Other Freeways and Expressways (Functional Class Code 2)
- Other Principal Arterial (Functional Class Code 3)
- Minor Arterial (Functional Class Code 4)
- Major Collector (Functional Class Code 5)
- Minor Collector (Functional Class Code 6)
- Local Road (Functional Class Code 7)
- Scenic Routes
- Urban Streets

Policy 4.A.b. Develop and manage the County's roadway system to maintain the following minimum levels of service (LOS)[2] using methodology adopted by the Tuolumne County Transportation Council:

- **Arterials, Minor Collectors, Major Collectors, Urban Streets:** LOS D, unless an exception is made
- **Local Road:** LOS C
- **Minimum Peak Hour of all Intersections:** LOS D

Policy 4.A.c. Establish priorities based on available funding for road improvement projects while balancing the need to support employment generating uses, affordable housing, and educational facilities. Emphasize, consistent with legal and funding constraints, the following road improvement projects in the County Road Improvement Program:

Policy 4.A.2. Dedicate, widen and construct roads according to design and access standards generally defined in Chapter 4 of the General Plan Technical Background Report and, more specifically, the County Ordinance Code and the Countywide Traffic Circulation Improvement Program. Exceptions to these standards may be necessary and shall be approved by the Community Resources Agency Director, who shall ensure that safe and adequate public access and circulation are preserved by such exceptions.

Policy 4.A.g. Require local roads serving new development to be aligned with existing local roads on abutting properties and extend existing roads to link with other roads wherever possible to provide continuity and provide safety in the local road system.

Policy 4.A.h. Accommodate through traffic in a manner that discourages the use of neighborhood Local Roads. This through traffic, particularly truck traffic, shall be directed to appropriate routes in order to maintain public safety and local quality of life by using design measures, such as appropriate signage and traffic calming devices.

Policy 4.A.i. Maximize intersection spacing on arterial and collector roadways and thoroughfares and minimize driveway encroachments. Except where specific site conditions warrant, no new intersection of a local road or new driveway with an arterial or collector road shall be closer to an existing local road or driveway than 500 feet in rural areas or 200 feet within urban areas.

Policy 4.A.5. Consider the traffic impacts of development in relation to General Plan growth policies and require new development to provide mitigation for its fair share of impacts to the County's transportation system. Assess the needs of street and road users regularly through the land development application review process.

[2] The County may allow exceptions to these level of service standards where it finds that the improvements or other measures required to achieve the LOS standards are unacceptable. In allowing any exception to the standards, the County shall consider the following factors, including congestion/delays, rights of way, environmental impacts, safety, aesthetics, alternative transportation modes, and other geographical, environmental, social or economic factors on which the County may base findings to allow an exceedance of the standards. Exceptions to the standards will only be allowed after all reasonably feasible measures and options are explored.

Policy 4.A.p. Evaluate and analyze the traffic impacts of proposed land uses in relation to stated goals and objectives of the General Plan since growth policies regarding land use decisions directly affect the existing and future transportation system.

Policy 4.A.q. Evaluate the impacts of new development on the County's transportation system and require such development to provide mitigation for its fair share of the impact. New development that is determined by the County to create or exacerbate an identified deficiency in the transportation system may not be approved if a plan and funding program to provide needed roadway improvements have not been approved and if the mitigation provided by the development will not correct the deficiency or if it will create an additional burden on County transportation funds. This implementation program shall not apply to new development for which the County makes a finding of overriding considerations for traffic impacts related to the new development in accordance with the California Environmental Quality Act.

Policy 4.A.r. Implement Vehicles Miles Traveled for evaluating transportation impacts under CEQA to be consistent with SB 743.

Policy 4.A.6. Strive to maintain all components of the transportation system at adopted level of service standards.

Policy 4.A.t. Require new development to mitigate that development's impacts on the local and regional transportation system through the fair share contribution of improvements to the master planned system and/or the payment of Traffic Impact Mitigation Fees. Exceptions to the payment of traffic impact mitigation fees may apply to land uses listed in the Traffic Impact Mitigation Fee Schedule or when alternative sources of funding can be identified to offset foregone revenues.

Goal 4B. Encourage the use of alternative means of transportation by providing safe bicycle and pedestrian facilities within urban development boundary areas and between identified communities thereby reducing road congestion which improves circulation, health and air quality within the County.

Tuolumne County Regional Transportation Plan (RTP)

The Tuolumne County Regional Transportation Plan (RTP) was prepared for the Tuolumne County Transportation Commission (TCTC) to identify future transportation improvement projects and funding throughout the County (TCTC 2017). The RTP provides general regional transportation goals and proposed transportation improvement projects consistent with those goals. The applicable regional goals listed in the RTP are identified below and reviewed in Section 3.14.4.

Regional Goal 1: Enhance the quality of life of Tuolumne County residents by providing transportation access to jobs, housing, recreation, and community services.

Regional Goal 5: Practice environmental stewardship by protecting our air quality, natural resources, historical and cultural assets.

Regional Goal 6: Integrate land use and transportation decisions by prioritizing infrastructure investments within the Defined Community Boundaries that strikes a balance between development, available infrastructure, conserves natural resources, and provides for a high quality of life.

Regional Goal 7: Consider transportation safety, and security in all transportation funding decisions.

Regional Goal 8: Support a vibrant economy by enhancing the movement of goods and people to spur economic development, growth, and job creation.

Tuolumne County Active Transportation Plan (ATP) 2020

The Tuolumne County Active Transportation Plan (ATP) 2020 was prepared by the Tuolumne County Transportation Council, and outlines needs, goals, and objectives to promote and maintain a reliable, flexible, and multimodal transportation system for Tuolumne County residents, and is consistent with the General Plan. The ATP identifies the following primary goals as they relate to the active transportation network:

Goal 1. Develop a transportation system that maximizes the use of transportation facilities in the most efficient and cost-effective way.

Goal 2. Plan for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel.

Goal 3. Plan, support, and implement Smart Mobility Framework and Context Sensitive Solutions

City of Stockton

Envision Stockton 2040 General Plan

The Envision Stockton 2040 General Plan Transportation Element outlines goals and policies for both the City and Port of Stockton. Specific goals and policies identified in the Transportation Element that are relevant to the proposed project operations at the Port are identified below:

Goal TR-1. Mobile Community. Provide an integrated transportation system that enables safe and efficient movement of people and goods for all modes of travel.

Policy TR-1.1. Ensure that roadways safely and efficiently accommodate all modes and users, including private, commercial, and transit vehicles, as well as bicycles and pedestrians and vehicles for disabled travelers.

Policy TR-1.2. Enhance the use and convenience of rail service for both passenger and freight movement.

Policy TR-1.3. Facilitate expanded port and airport operations, service, and development as travel and goods movement assets to the community and sources of employment growth.

Goal TR-4. Effective Transportation Assessments. Ensure that traffic-related impacts of proposed land uses are evaluated and mitigated.

Policy TR-4.2. Replace LOS with: (1) vehicle-miles traveled (VMT) per capita; and (2) impacts to non-automobile travel modes, as the metrics to analyze impacts related to land use proposals under the California Environmental Quality Act, in accordance with SB 743.

Policy TR-4.3. Use the threshold recommended by the California Office of Planning and Research for determining whether VMT impacts associated with land uses are considered significant under State environmental analysis requirements.[3]

West Complex Development Plan (WCDP)

The West Complex Development Plan (WCDP), includes planned development and growth of the West Complex within the Port of Stockton. The 2004 WCDP EIR found environmental impacts related to trip generation related to the additional truck traffic to the Port, as well as other impacts related to the overall projected increase of traffic associated with implementation of the WCDP under Cumulative 2020 conditions. An addendum to the EIR was completed in 2021 (Denmar Addendum), which reviewed remediation, construction, and operational changes planned for the Denmar terminal, and compared existing operations of the West Complex with the original projections for the year 2020 assumed under the WCDP. Findings in the Denmar Addendum showed that existing West Complex trip generation fell significantly below projected values reported in the 2004 EIR, as noted below.

- Trucks
  - WCDP EIR Project Calls (2020): 1,327,350
  - Existing West Complex Calls (2019): 274,343
- Ships
  - WCDP EIR Project Calls (2020): 150
  - Existing West Complex Calls (2019): 43
- Trains
  - WCDP EIR Project Calls (2020): 240
  - Existing West Complex Calls (2019): 188

Consistency with the WCDP, WCDP EIR, and subsequent Denmar Addendum to the WCDP EIR are reviewed in the impact analysis below, where applicable.

Port of Stockton Rail Bridge Replacement and Rail Improvement

The Final Environmental Assessment (FEA) for the Port of Stockton Rail Bridge Replacement and Rail Improvement Project was completed in March 2023, and evaluated the effect of the United States Coast Guard's (USCG) issuance of a Bridge Permit that would "result in removal and replacement of the Port of Stockton's functionally obsolete rail swing bridge over the San Joaquin River and the related construction of a new lead track to increase the overall efficiency of train operations within the Port" *(*Anchor QEA LLC 2023). The Rail Improvement Project would replace the existing single-track bridge connecting the East and West Complexes with a double-track span, to accommodate the Port's growth and reduce system bottlenecks. The FEA indicates that the current Port's rail system serves 21 trains per week, with a project increase to 34 trains by 2026. The replacement bridge would also be designed to handle 286k and 315k unit trains, which would support the Port's goals of more efficient movement of cargo by rail instead of by trucks.

[3] The updated City of Stockton TIA Guidelines were adopted May 2, 2023, and establish VMT thresholds and screening criteria, consistent with City's General Plan Policy TR-4.3.

Findings in the FEA found that the proposed Rail Improvement Project would avoid significant environmental impacts, with short-term, minor, adverse impacts and short-term, minor beneficial impacts to transportation. Additionally, no mitigation measures were identified for transportation-related impacts.

3.14.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to transportation are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to transportation would occur if the project would:

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

3.14.4 Impact Analysis

3.14.4.1 Methodology

The proposed project would consist of three primary phases: feedstock acquisition, wood pellet production, and transport to market. The impact analyses below evaluate each of these primary phases as related to transportation, where applicable.

Transportation information and data for this analysis was primarily obtained from the Golden State Natural Resources Forest Resiliency Demonstration Project's Transportation Impact Studies (TIS) for the Lassen Facility and the Tuolumne Facility, both prepared by Dudek, February 2024 (Appendices I2 and I3, respectively).

Project Vehicle Trips

The project vehicle trip generation associated with the Lassen and Tuolumne pellet processing facilities are summarized in Table 3.14.1 below, and additional project trip information is provided in the TIS's as well as in Section 2 of this EIR. In addition, the programs, plans, ordinances, and policies listed in Section 3.14.2, were analyzed for their applicability to the proposed project's vehicle operations.

Table 3.14-1. Vehicle Trip Generation Summary (Lassen and Tuolumne Facilities)

Vehicle Type	Daily Quantity		Daily Trips	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Lassen Facility									
Employees (Passenger Vehicles)[1]	60	workers	120	28	16	44	16	0	16
Logging/Haul Trucks (day)[2]	191	trucks	383	16	16	32	16	16	32
Logging/Haul Trucks (night)[2]	82	trucks	164	0	0	0	0	0	0
Ash Removal[3]	1	trucks	2	1	0	1	0	1	1

Table 3.14-1. Vehicle Trip Generation Summary (Lassen and Tuolumne Facilities)

Vehicle Type	Daily Quantity		Daily Trips	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Lassen Facility Total			**669**	**45**	**32**	**77**	**32**	**17**	**49**
Tuolumne Facility									
Employees (Passenger Vehicles)[1]	51	workers	102	25	13	38	13	0	13
Logging/Haul Trucks (day)[2]	82	trucks	165	7	7	14	7	7	14
Logging/Haul Trucks (night)[2]	36	trucks	71	0	0	0	0	0	0
Ash Removal[3]	1	trucks	2	1	0	1	0	1	1
Tuolumne Facility Total			**340**	**33**	**20**	**53**	**20**	**8**	**28**

1 Assumes employee arrivals and departures coincide with shift times.

2 Trucks are assumed to arrive and depart the site throughout the day. Feedstock would be received 24 hours per day, with 70 percent of total daily feedstock expected to be received across 12 hours from 7am to 7pm, and 30 percent of total daily feedstock to be received overnight from 7pm to 7am.

3 Ash removal may occur at any time of the day; 1 truck trip is assumed to arrive during the AM peak hour and depart during the PM peak hour for the purposes of this analysis. Ash removal would occur once every two days at Lassen, and once every four days at Tuolumne.

Project Train Trips

The project train trip generation associated with the Lassen and Tuolumne pellet processing facilities, along with the train trips accessing the Stockton Terminal, are summarized in Table 3.14.2 below. Train trips would be generated from both the Lassen and Tuolumne Facilities, traveling to the Port of Stockton, along established BNSF, UP, CCTC, and SERA)railways.

Additional project train trip information is provided in the TIS's as well as in Section 2 of this EIR. As with vehicle operations, the programs, plans, ordinances, and policies listed in Section 3.14.2, were analyzed for their applicability to the proposed project's train operations.

Table 3.14-2. Train Trip Generation Summary (Lassen and Tuolumne Facilities; Stockton Terminal)

Location	Daily Train Trips			Annual Train Trips		
	Existing	Project	Existing plus Project	Existing	Project	Existing plus Project
Lassen Facility[1]	0	1	1	0	70	70
Tuolumne Facility[1]	0	0 (12-14 cars)	0 (12-14 cars)	0	0 (+3,000 cars)	0 (+3,000 cars)
Stockton Terminal[3]	3	1 (+ 12-14 cars)	4 (+ 12-14 cars)	1,092[1]	70 (+3,000 cars)	1,162 (+3,000 cars)

1 The Lassen facility would generate one unit train, consisting of 100 cars, every 5 days (70 per year), which is rounded up in the table as a maximum of 1 train per day.

2 The Tuolumne Facility will only generate "manifest" train trips, which indicate the addition of train cars to an existing train already in operation. The Tuolumne Facility will not generate the need for an additional unit train. Thus, the Tuolumne Facility shows the increase in the number of rail cars, rather than in increase in train trips. A full description of manifest and unit train trips is provided in Section 3.14.4.2.

3 Existing daily and annual train trips estimated from Port of Stockton FEA (Anchor QEA LLC 2023), which reports an average of 21 trains per week served by the Port's rail system.

Additional methodology related to the impact analysis is provided below.

Vehicle Miles Traveled

The CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." "Automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Other relevant considerations may include the effects of a project on transit and non-motorized travel.

The Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) provides technical assistance and recommendations for the analysis of VMT. The methodology recommendations for the VMT analysis include a discussion on vehicle types. An excerpt from the OPR Technical Advisory regarding vehicle types is below:

> **"Vehicle Types.** Proposed Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation."

Per Section 21099 of the Public Resource Code, the selection of the VMT criteria for determining the significance of transportation impacts was intended to promote reductions of greenhouse gas emissions (GHG); to develop multimodal transportation networks; and to diversify land uses. As mentioned in OPR's Technical Advisory, there are various legislative mandates and state policies that establish quantitative GHG emission reduction targets. Pursuant to Senate Bill 375, the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) call for reductions in GHG emissions only from cars and light trucks. As such, VMT impacts are analyzed based on the number of employee trips within the specified boundary area, and not logging/haul truck trips.[4]

VMT was analyzed at both the Lassen and Tuolumne wood pellet production locations, where the largest concentration of employee trips would occur. OPR provides the following screening guidance to determine if a project should be expected to cause a less-than-significant impact (OPR 2018):

- **Screening Threshold for Small Projects:** Projects that generate or attract fewer than 110 trips per day and are consistent with a Sustainable Communities Strategy (SCS) or general plan.
- **Map-Based Screening for Residential and Office Projects:** Projects located in areas with low VMT that incorporate similar features (i.e., density, mix of uses, transit accessibility).
- **Presumption of Less Than Significant Impact Near Transit Stations:** Certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an

[4] Impacts related to logging/haul truck trips are accounted for in Chapter 3.7 – Greenhouse Gas Emissions.

existing major transit stop[5] or an existing stop along a high quality transit corridor[6] will have a less-than-significant impact on VMT. This presumption would not apply, if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

- **Presumption of Less Than Significant Impact for Affordable Residential Development:** A project consisting of a high percentage of affordable housing may be basis for the lead agency to find a less-than-significant impact on VMT.
- **Presumption of Less Than Significant Impact for Local Serving Retail:** Locally serving retail projects, less than 50,000 square feet.

If a project does not meet the above screening criteria, consistent with the OPR guidelines (OPR 2018) and CEQA Guidelines Section 15064.3(b), the following specific VMT metrics are recommended to complete a VMT impact assessment:

- **Residential Projects:** VMT per resident for all home-based trips.
- **Employment[7] Projects:** VMT per employee for only the home-based-work trip purpose[8]
- **Regional Retail (>50,000 square feet):** Total VMT per service population for trips taken by both workers and visitors.
- **Mixed-Use:** Total VMT per service population.
- **Other:** Total VMT per service population for trips taken by both workers and visitors.

Lassen County

The County of Lassen does not have established VMT thresholds or standards; as such, use of OPR's guidance is provided in this analysis. OPR recommends a 15% reduction from baseline VMT per capita or per employee for

5 PRC Section 21064.3: "'Major transit stop' means 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 the morning and afternoon peak commute periods."

6 PRC Section 21155: "For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

7 The OPR Guidelines do not provide a category for all employment generating land uses, referring to use of the VMT per employee metric for "office" projects. However, pursuant to CEQA Guidelines, § 15064.7(c), w*hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.* Several agencies have adopted their own thresholds of significance utilizing this metric for not only purely office projects, but also for industrial or similar employment generating uses as well. Under the Tuolumne County VMT Thresholds Resolution and Staff Report on August 4, 2020 (County of Tuolumne 2020), the County of Tuolumne adopted the VMT per employee metric for both office and industrial employment projects. Additionally, the City of Stockton TIA Guidelines, adopted on May 2, 2023 (City of Stockton 2023), also indicate that in general, work-related land uses may be treated like the office land use. As the automobile trips associated with the proposed project are generated by employees (e.g., trips originating from a residence with the primary destination being a place of employment), the VMT per employee metric utilized in this analysis is consistent with the intent of the OPR guidance and as adopted by both the City of Stockton and County of Tuolumne.

8 A home-based-work trip is any trip where the home is either the origin or destination of the trip, and the non-home end (origin or destination) is a workplace.

residential and work projects, respectively (OPR 2018). As the proposed project involves sourcing feedstock for manufacturing of wood pellets into wood byproducts sourced from Sustainable Forest Management Projects such as hazardous fuel reduction projects, construction of shaded fuel breaks, and salvage harvests; the project primarily functions as an employment project for the purposes of VMT. Therefore, home-based work (HBW) VMT per employee metric was used in the assessment of VMT impacts, capturing the VMT from workers traveling to and from the wood pellet processing facility.

Additionally, due to the lack of a regional travel demand model for the County of Lassen, two resources were used to analyze VMT for the proposed project:

1. California Statewide Travel Demand Model (CSTDM)
2. U.S. Census Bureau OnTheMap application9

The CSTDM is a statewide model; therefore, it contains larger traffic analysis zones (TAZs) compared to regional models and provides a high-level VMT analysis. The CSTDM has a base year of 2020, with a forecast year of 2040. Based on data provided in the CSTDM for Lassen County, 15% below the County average home-based work VMT per employee is 14.13.

Due to the size of TAZs included in the statewide model, census information from the Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) dataset was also reviewed to provide more granular data of Lassen County's employment characteristics. This data is available through the OnTheMap application, which provides 24 census block groups within Lassen County, as opposed to the six (6) TAZs included in the CSTDM for Lassen County.

For all 24 census blocks groups, the Distance/Direction Analysis was performed in the tool to obtain the Work-to-Home metric, which identifies the target census block as the "work" location and identifies the corresponding "home" locations. The distances between each origin and destination pair was tabulated to obtain total trip lengths. It must be noted that due to the raw nature of the reported census data, the data identified many "home" locations as much further outside of Lassen County areas than would be realistic for day-to-day travel (e.g., southern California). Further refinement of this dataset would be necessary to determine if reported work locations within Lassen County were addresses of where people physically worked, or rather only where an employer's address was located, for example. As such, a total trip length of 200 miles (100 miles in one direction) was used to truncate trips and provide a realistic estimate of VMT within the County.

The difference in CSTDM VMT estimates and those determined from OnTheMap census data is shown in Table 3.14-3. As noted, "home" locations up to 100 miles from the from the target census block groups were captured in the dataset, and result in much higher VMT estimates than estimated from the CSTDM. This analysis does not attempt to compare the two datasets, but to provide a comparison of the VMT within the proposed wood pellet processing facility's TAZ or census block group to each respective dataset.

9 The OnTheMap application is a web-based mapping and reporting application provided by the U.S. Census Bureau, which enables access to the Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) dataset. OnTheMap can be access at https://onthemap.ces.census.gov/.

Table 3.14-3. Lassen County VMT Threshold Summary

	CSTDM[1]	OnTheMap[2]
	VMT per Employee	
Regional Average (Lassen County)	16.63	67.46
15% below Lassen County	14.13	57.34

Notes:
VMT = vehicle miles traveled; SJCOG = San Joaquin Council of Governments; RTDM = Regional Travel Demand Model; CSDTM = California State Transportation Demand Model.
1 CSTDM TAZ excel spreadsheet, updated version provided via email communication August 18, 2023 (Caltrans 2023)
2 U.S. Census Bureau OnTheMap application (U.S. Census Bureau 2023).

Tuolumne County

The County of Tuolumne adopted VMT thresholds and guidance per the Tuolumne County VMT Thresholds Resolution and Staff Report on August 4, 2020 (County of Tuolumne 2020). Per the Resolution, Tuolumne County provides the following screening guidance to determine if a project should be expected to cause a less-than-significant impact:

- **Residential, Office, or Industrial Employment Project Located within a Low VMT Area:** Low-VMT areas defined by the TCTC VMT maps.
- **Small Project:** Less than 110 trips per day and consistent the General Plan.
- **Local Serving Retail:** Local-serving and 50,000 square feet or less.
- **Local Serving Public Facility:** Public K-12 schools, local parks, libraries, post offices, police stations, utility buildings, etc.
- **Affordable Housing:** 100% affordable housing located in identified communities.
- **Mixed-Use Project:** Each project land use type should be considered separately and compared against the appropriate screening criteria.
- **Redevelopment Project:** Projects that would generate less total VMT than the existing land use they are replacing.

If a project does not meet the above screening criteria, consistent with the County and OPR guidelines, along with CEQA Guidelines Section 15064.3(b), the following specific VMT metrics are recommended to complete a VMT impact assessment:

- **Residential:** A project's VMT is less than or equal to the subarea average VMT per capita under baseline conditions, and the project is consistent with the County/City General Plan and the RTP.
- **Office/Industrial:** A project's VMT is less than or equal to the subarea average VMT per employee under baseline conditions, and the project is consistent with the County/City General Plan and the RTP.
- **Retail/Non-Office Commercial:** No net increase in total regional VMT.
- **Hotel/Campground:** Consistent with General Plan and less than or equal to subarea baseline average VMT per room/site.
- **Mixed-Use:** Analyze each land sue individually per the relevant thresholds.
- **Redevelopment:** If the redevelopment of an existing site leads to a net overall decrease, or no change in VMT, the project impact would be less than significant. If the redevelopment of an existing site leads to a

net overall increase in VMT, the project would be evaluated based on the relevant thresholds as if it were a new project.

As noted above, the project primarily functions as an employment project for the purposes of VMT. As such, HBW vehicular trips were selected for evaluation to estimate trips associated with work VMT and estimate an average HBW VMT per employee within the Lake Don Pedro Subarea (County of Tuolumne 2020). Within this subarea, the County of Tuolumne recommends 100.4 VMT per employee as a threshold for VMT impacts as noted in Table 3.14-4 below.

Table 3.14-4. VMT Threshold Summary

	Tuolumne County RTDM[1]
	VMT per Employee
Subarea Average (Lake Don Pedro Subarea)	100.4

Notes:
VMT = vehicle miles traveled; RTDM = Regional Travel Demand Model
[1] Attachment A (Baseline Average VMT for Subareas) of the Tuolumne County SB 743 VMT Thresholds Study (County of Tuolumne 2020)

City of Stockton

The City of Stockton established VMT thresholds and guidance in the updated City of Stockton TIA Guidelines (adopted May 2, 2023). Per the City of Stockton's TIA Guidelines, and similar to the County of Tuolumne and OPR's screening criteria noted above, a project would be expected to cause a less-than-significant impact if it meets any of the screening criteria noted below:

- Low VMT Area
- Transit Priority Area (TPA)
- Affordable Housing
- Small Projects
- Locally Serving Public Facility
- Neighborhood-Serving Retail Project
- Consistent with General Plan and Zoning

Applicability of these screening criteria is further reviewed in Section 3.14.4.2.

If a project does not meet the above screening criteria, consistent with the City and OPR guidelines, along with CEQA Guidelines Section 15064.3(b), the following specific VMT metrics are recommended to complete a VMT impact assessment:

- **Residential:** 15% below the Citywide average for home-based VMT per resident.
- **Office:** 15% below the Citywide average for home-based work VMT per employee.
- **Retail:** No net increase in total VMT.
- **Other Land Uses:** To be established on a case-by-case basis, reflecting the City's commitment to achieving VMT reductions while also being sensitive to the characteristics of the project being evaluated. In general, work-related land uses may be treated like the office land use subject to city approval. Likewise, land uses

that generate a high proportion of their vehicle trips from visitors or customers may be treated like the retail land use subject to city approval.

As noted above, the project primarily functions as an employment project for the purposes of VMT. As such, HBW vehicular trips were selected for evaluation to estimate trips associated with work VMT and estimate an average HBW VMT per employee within the City of Stockton (City of Stockton 2023). The City of Stockton recommends 15.78 VMT per employee as a threshold for VMT impacts as noted in Table 3.14-5 below.

Table 3.14-5. VMT Threshold Summary

	City of Stockton General Plan Model[1]
	VMT per Employee
Baseline Level (citywide average)	18.56
Impact Threshold (15% below citywide average)	15.78

Source: Table 6: VMT Impact Criteria for Land Use Projects under Baseline Conditions (City of Stockton 2023)
Notes: VMT = vehicle miles traveled

Hazardous Features (Project Access)

The analysis evaluates whether the project would result in hazards due to design features by determining appropriate acceleration and deceleration lane lengths, analyzing proximity of project driveways to other driveways, driveway throat depths, and truck access. A significant impact would occur if truck traffic would not be able to navigate the site due to insufficient driveway widths or curb radii, locations of project driveways would interfere with nearby driveways, or if vehicle queueing would impact on- or off-site vehicle operations.

Emergency Access

The emergency access analysis evaluated whether the project would comply with Lassen County's and Tuolumne County's emergency access and/or evacuation requirements, including those imposed by the local fire departments. A significant impact would occur if the project would not comply with Section 503.1 of the California Fire Code and the applicable County fire access and roadway standards such that emergency vehicles would not be able to access project sites within the proposed project.

3.14.4.2 Project Impacts

Impact TRF-1 The project may conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed further below.

Feedstock Acquisition

Sustainable Forest Management Projects

Feedstock destined to the Lassen and Tuolumne facilities will be wood byproducts sourced from Sustainable Forest Management Projects such as hazardous fuel reduction projects, construction of shaded fuel breaks, and salvage harvests located within the Working Area (see Chapter 2, Project Description, for a full description). The feedstock

would originate from private, state, tribal, and federal timberlands located within these areas. The projects would be temporary in nature and occur in areas where vegetation management would be consistent with land use and the circulation system (such as forest lands and timberlands).

As noted under Chapter 3.14.2.1, use of a National Forest System Road for commercial hauling is prohibited without a Road Use Permit or written authorization. As GSNR will operate under Project Design Features that require compliance with all applicable laws (see Section 2.4), and therefore adherence to U.S. Forest Service and state laws (e.g., Road Use Permits) would be required, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be **less than significant**.

Wood Pellet Production

Lassen Facility

California PUC

The project would not include the construction of roadways or driveways across railroad tracks. Existing railroad tracks primarily run along the eastern boundary of the project site, and an existing switching yard is present on-site. Any improvements to the railroad facilities would be done in accordance with PUC standards, and the proposed project would not conflict with an applicable program, plan, ordinance, or policy addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be **less than significant**.

Lassen County General Plan

The proposed project would not conflict with the circulation policies within the County's Circulation Element of General Plan, or the County's ATP, including policies related to maintaining and expanding a safe and efficient circulation and transportation system, except for the addition of truck traffic to Babcock Road which has the potential to conflict with Policy CE-6 and CE-10.

Employees and haul trucks accessing the Lassen Facility would use existing roadways and intersections from SR-299. However, the project would add approximately 274 trucks per day to Babcock Road to access the project site. Although Babcock Road is currently paved, the addition of approximately 549 total daily truck trips (accounting for both inbound and outbound trucks) between SR-299 and the project site may cause faster degradation of this stretch of Babcock Road if it was not designed to withstand this daily load.

The project would not include site improvements that would interfere with existing public transit, bicycle, or pedestrian facilities, or impede the construction of new or the expansion of such existing facilities in the future. Bicyclist and pedestrian safety would be maintained at existing levels in the area. As noted in the RTP, there are proposed Class II Bike Lanes along SR-299 adjacent to the project site's frontage; however, the ATP currently identifies this segment of SR-299 as a "Tier 3" Highway Segment, which indicates low relative priority for pedestrian and/or bicycle facility improvements. Additionally, as bus routes do not currently operate near the project site, the project would not conflict with or result in the change of bus routes in the study area; therefore, the project would not severely delay, impact, or reduce the service level of transit in the area.

The potential conflict with Lassen County General Plan Policy CE-6 and CE-10 could result in the physical degradation of Babcock Road, resulting in a **potentially significant** impact.

Lassen County Regional Transportation Plan (2023-2043)

The overarching goals of the RTP are to create a transportation system which supports the needs of the system user, enhance the economy, preserve the environment, and minimize traffic congestion. Goals also include providing adequate cost-effective public transit services, providing a safe and efficient bicycle and pedestrian circulation system, and to promote a convenient, desirable, and reliable public transit system and active transportation system for all users, and where feasible, reduce the demand for single occupant vehicles. The project would not include site improvements that would interfere with existing infrastructure supporting multi-modal mobility or impede the construction of new or the expansion of such existing facilities in the future. For these reasons, proposed project would not conflict with the applicable goals in the RTP.

Therefore, the project would not adversely affect, in a manner that conflicts with, an applicable program, plan, ordinance, or policy addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be **less than significant**.

Tuolumne Facility

California PUC

The project includes improvements to the northern site access driveway to serve as an employee access to the site. The site access driveway railroad crossing is not currently used and is marked off by rocks and temporarily fenced further east. However, the two residential properties currently use a separate but adjacent railroad crossing and driveway for access. Improvements would include paving and addition of signage per the PUC Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings pursuant to General Order (G.O.) No. 75-D. This crossing would occur on GSNR's privately-owned land, and would be subject to Section 7 (Private At-Grade Crossings) of G.O. No. 75-D.

All improvements at this railroad crossing would be designed pursuant to these standards, and the proposed project would not conflict with an applicable program, plan, ordinance, or policy addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be **less than significant**.

Tuolumne County General Plan

The proposed project would not conflict with the circulation policies within the County's Transportation Element of General Plan, or the County's ATP. The Transportation Element includes goals to provide the safe and efficient movement of people and goods and encourages the use of alternative means of transportation by providing safe bicycle and pedestrian facilities within urban development boundary areas and between identified communities.

The project is proposing to improve the northern site access driveway to serve as an employee access to the site. The improvements are intended to enhance vehicle circulation and site access and would not hinder the County's ability to provide a unified, coordinated, and cost-efficient countywide road and highway system. As noted above, all improvements across the railroad crossing would occur on privately owned land and would be constructed per PUC standards. The project would not include site improvements that would interfere with existing public transit,

bicycle, or pedestrian facilities, or impede the construction of new or the expansion of such existing facilities in the future. Additionally, as bus routes do not currently operate near the project site, the project would not conflict with or result in the change of bus routes in the study area; therefore, the project would not severely delay, impact, or reduce the service level of transit in the area. Impacts would be **less than significant**.

Tuolumne County Regional Transportation Plan (RTP) 2016

The overarching goals of the RTP are to create a transportation system which supports the needs of the system user, enhance the economy, preserve the environment, and integrate land use and transportation decisions by prioritizing infrastructure investments. Goals also include considering transportation safety and security in all transportation funding decisions supporting sustainable transportation options, and optimizing the existing local, interregional and regionally significant roadway system to support improved safety and multi-modal mobility. The project also would not include site improvements that would interfere with existing infrastructure supporting multi-modal mobility or impede the construction of new or the expansion of such existing facilities in the future. For these reasons, proposed project would not conflict with the applicable goals in the RTP. Impacts would be **less than significant**.

Transport to Market

Stockton Terminal

The Port of Stockton is a fully operational port. The addition of the GSNR facility, which would employ eight (8) daily GSNR employees over three shifts, and require an additional eight full-time equivalent (8) stevedores for ship loading, would have a minimal effect on vehicular traffic and would not conflict with local plans and policies. Review of current Port of Stockton railway operations[10] indicate a daily count of 16 trains, with eight (8) during daytime hours (6:00 AM to 6:00 PM), and eight (8) during nighttime hours (6:00 PM to 6:00 AM), recorded at the BNSF Railway Company (BNSF) at-grade train crossing over Lincoln Street, east of I-5 (DOT Crossing Inventory Number 029617R). After transferring from the BNSF tracks onto the Central California Traction Company (CCTC) railroad under the Ort J. Lofthus Freeway, the estimated number of total trains recorded through the at-grade Washinton Street crossing (DOT Crossing Inventory Number 757370W) indicate six (6) trains during daytime hours and four (4) trains during nighttime operations, along with eight (8) switching trains, for a total of 18 daily trains recorded at this crossing. Finally, once trains cross the Navy Drive Bridge from the East to West Complex, a count of four (4) daytime, one (1) nighttime, and two (2) switching trains was recorded at the at-grade crossing over Fyffe Street to Hooper Street (DOT Crossing Inventory Number 752931R), for a total of seven (7) daily trains recorded near the proposed spur into the GSNR facility. The project would result in one additional train trip per day, on average (70 annual unit train trips[11] from Lassen and 240 annual manifest train trips[12] from Tuolumne). The use of trains, rather than trucks, is consistent with City policy TR-1.2 (Enhance the use and convenience of rail service for both passenger and freight movement). as well as the WCDP. Impacts would be **less than significant**.

Additionally, the Port of Stockton Rail Bridge Replacement and Rail Improvement Project FEA, which plans improvements to the railways within the Port including replacement of the Navy Drive Bridge with a double-track

10 Current railway operations estimated from the U.S. Department of Transportation (DOT) Federal Railways Administration (FRA) Crossing Inventory Form. See Appendix I1 for referenced DOT Crossing Inventory Number reports.

11 A "unit" train refers to a train transporting a single commodity from the same origin to the same destination. One unit train trip in this context refers to a train traveling from the Lassen Facility to the Port of Stockton.

12 A "manifest" train combines rail cars from different freight companies and origins, traveling to the same destination. One manifest train trip in this context is the addition of 12-14 cars with project operations to an existing train traveling along the Sierra Northern Railway to the Port of Stockton.

span, was reviewed for consistency with the proposed project. The FEA indicates that rail operations are projected to grow from 21 trains per week in 2023 to 34 trains per week by 2026. The proposed project's addition of approximately one train per day would be within these projections, nor would construction of the GSNR Facility conflict with implementation of the Port's Rail Improvement Project, including both replacement of the Navy Drive Bridge or other improvements planned along the Port's railways.

The project would not adversely affect, in a manner that conflicts with, an applicable program, plan, ordinance, or policy addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be **less than significant**. No mitigation is required.

Impact TRF-2 The project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Feedstock Acquisition

Sustainable Forest Management Projects

As noted below, for the purposes of vehicle travel as it relates to VMT under this impact criteria is focused on passenger vehicles, specifically cars and light trucks. Acquisition of biomass from feedstock areas will primarily occur using logging/haul trucks, with a small crew supporting timber harvest at each acquisition site. Although the crew size and location will vary widely depending on the intensity of the specific project across the Working Area, crews (or "sides" at any given location would not normally exceed 6 workers, resulting in 2 to 12 daily commuting trips, depending on extent of carpooling. These trips will be temporary in nature, lasting only for the extent of each timber harvesting job, and opportunities for carpool/vanpool from staging areas to work sites may occur to further reduce the number of vehicles traveling to remote locations. Per the OPR Technical Advisory screening criteria, small projects generating less than 110 daily trips can be screened out from significant VMT impacts. Therefore, as feedstock acquisition will result in 2 to 12 temporary daily trips at any one work site across the Working Area, project VMT impacts related to feedstock at any one area would be less than significant since this component would not generate substantial commuting passenger-car trips.

However, the number of simultaneous feedstock acquisition projects is unknown, and has the potential to exceed 110 daily trips across the entire Working Area. As described in Chapter 2, Project Description, feedstock for manufacturing of wood pellets will be sourced from Sustainable Forest Management Projects on California's private, state, tribal, and federal timberlands, which includes the following types of projects:

- **GSNR Biomass Only Thinning Projects** are wildfire fuel reduction operations, including vegetation management activities on forested lands designed to reduce the risk and severity of wildfire occurrence.
- **Harvest Residuals Projects** include those which GSNR will procure and utilize residual biomass material resulting from timber harvest and forest management operations undertaken by third-parties unaffiliated with GSNR.
- **Mill Residuals Projects** include those which GSNR will procure and utilize residual biomass material resulting from by-products of commercial lumbermills operated by third-parties unaffiliated with GSNR, including mill residual chips, sawdust, planer shavings, and bark.

As Mill Residuals would be removed from the forest and disposed of by the source mill facilities regardless of GSNR's proposed project, these components of the Sustainable Forest Management Projects are not expected to result in a net increase in VMT. However, GSNR Biomass Only Thinning Projects and the removal of Harvest Residuals from the forest would not occur without GSNR's proposed project; therefore, this component would

generate a net increase in VMT compared to baseline conditions. The scale of GSNR Biomass Only Thinning Projects ranges from 10 to 2,000-acre areas, with daily trips from all feedstock acquisition projects ranging from 2 to 12 daily commuting trips and the number of simultaneously occurring projects varying widely. The removal of Harvest Residual materials entails even fewer vehicle trips for each individual project, as only the trips associated with the removal activities, and not the underlying forest treatments (which are occurring regardless), are attributable to GSNR's proposed Forest Resiliency Demonstration Project. Although each of these projects would meet the OPR Technical Advisory screening criteria for small projects generating less than 110 daily trips, due to their variability in timing and location, impacts related to feedstock acquisition would be **potentially significant**.

Wood Pellet Production

Lassen Facility

As no regional model exists within the County, project VMT has been estimated by reviewing the VMT within the existing TAZ or census block group where the Lassen facility is located, using either the CSTDM or OnTheMap application as noted above. Additionally, the OPR Technical Advisory methodology for screening and project impact thresholds is used as the basis for this analysis.

The following screening criteria were analyzed per the OPR Technical Advisory. Any one of the following criteria would need to be satisfied in order to screen-out of significant VMT impacts:

- **Screening Threshold for Small Projects:** As noted in Table 3.14-1, the proposed project would employee 60 workers per day at the Lassen Facility, generating approximately 120 daily trips. Therefore, the project would not meet the criteria for projects generating less than 110 daily trips and *cannot* be screened-out from further VMT analysis under this criterion.
- **Map-Based Screening for Residential and Office Projects:** As noted above, no regional model exists within the County, nor does a VMT screening map exist. Using the CSTDM and the OnTheMap application, the location of the project TAZ (or census block) was compared with the average of all TAZs (or census blocks) within Lassen County. The VMT within the existing TAZ or census block groups where the Lassen facility is located does not fall below the County averages; therefore, the project *cannot* screened-out from further VMT analysis under this criterion. Further discussion and analysis is provided below and shown in Table 3.14-4.
- **Presumption of Less Than Significant Impact Near Transit Stations:** The project is not located near a transit station; therefore, it *cannot* screened-out from further VMT analysis under this criterion.
- **Presumption of Less Than Significant Impact for Affordable Residential Development:** The project is not a housing project; therefore, it *cannot* screened-out from further VMT analysis under this criterion.
- **Presumption of Less Than Significant Impact for Local Serving Retail:** The project is not a retail land use; therefore, it *cannot* screened-out from further VMT analysis under this criterion.

As available modeling tools cannot estimate project-specific VMT for the proposed Lassen facility, it is assumed that the facility would generate similar travel characteristics as the census block group or TAZ where the project is located. Table 3.14-6 provides a summary of this, along with a comparison to the estimated County thresholds.

Table 3.14-6. Lassen County VMT Thresholds and Project Site Analysis

	CSTDM[1]	OnTheMap[2]
	VMT per Employee	
Regional Average (Lassen County)	16.63	67.46
15% below Lassen County	14.13	57.34
TAZ 122 (Project Site TAZ)	28.19	—
1-401 (Project Site Census Block)	—	70.83
% Project Site Location Above County Average	69.52%	5.00%
% Project Site Location Above 15% below County Average	99.51%	23.53%

Source: Appendix I2
Notes:
VMT = vehicle miles traveled; CSDTM = California State Transportation Demand Model.
1 CSTDM TAZ excel spreadsheet, updated version provided via email communication August 18, 2023 (Caltrans 2023)
2 U.S. Census Bureau OnTheMap application (U.S. Census Bureau 2023).

There is a wide range of VMT per employee values and percentage increases between County averages and project site location estimates depending on the methodology used. However, as noted above, this analysis does not attempt to compare the two datasets, but to provide a comparison of the VMT within the proposed wood pellet processing facility's TAZ or census block group to each respective dataset. As the project would be located within a high-generating VMT area (e.g., above the average VMT per employee across the County), it is likely that the project would have a similarly high VMT. Although both the TAZ and census block group encompass large areas of the County, the rural characteristics, along with employment and housing opportunities across each respective area are similar to that of the project's surroundings.

The project is located far from major population centers, and nearby housing is limited. As indicated in Section 3.12, Population and Housing), "commuting to work is a common characteristic of the existing workforce" in the region, and the proposed Project workforce is expected to remain consistent with that pattern. Employee vanpools or carpooling opportunities would be dependent on the location of the workforce. The California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA 2021) transportation measures to reduce GHG emissions were reviewed for feasibility of reducing project related VMT. Due to the rural nature of the proposed Lassen Facility, the following measures were considered based on both the locational context and applicability to the project:

T11 – Provide Employee-Sponsored Vanpool

Per the CAPCOA Handbook, Measure T-11 would implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions.

Based on default values provided in the CAPCOA Handbook for Measure T-11, the percent reduction of GHG emissions from an employee-sponsored vanpool service could range from 3.4% to 20.4%, with a similar range in VMT reductions. Due to the remote nature of the Lassen Facility and spread of nearby population centers, the extent of implementation of a vanpool service is unknown at this time; however, CAPCOA Measure T-11 is considered a

feasible mitigation measure for the proposed project when applicable (i.e., when 5 or more employees with similar work hours live close enough to one another for van pooling to be practicable).

T13 – Provide Electric Vehicle Charging Infrastructure

Measure T-13 would:

> install onsite electric vehicle chargers in an amount beyond what is required by the 2019 California Green Building Standards (CALGreen) at buildings with designated parking areas (e.g., commercial, educational, retail, multi-family). This will enable drivers of PHEVs to drive a larger share of miles in electric mode (eVMT), as opposed to gasoline-powered mode, thereby displacing GHG emissions from gasoline consumption with a lesser amount of indirect emissions from electricity. Most PHEVs owners charge their vehicles at home overnight. When making trips during the day, the vehicle will switch to gasoline mode if/when it reaches its maximum all-electric range.

This measure could reduce GHG emissions up to 11.0%, with the range of VMT reductions related solely to a reduction of electric vehicle VMT (eVMT), but not overall VMT. Although provision of electric vehicle (EV) charging on-site would allow for employees to charge EVs, thereby reducing eVMT and help meet the goals of SB 743 regarding GHG reduction, quantification of this measure would require some level of certainty that employees own an EV or have the capacity to use one for their daily commute. Although it would not be feasible for the project to provide EVs to their employees, nor would it be assumed that all or a subset of employees own an EV, installing EV charging at a workplace under CAPCOA Measure T-13 would enable drivers to have the option of workplace charging, providing an incentive for employees to utilize EV vehicles. As such CAPCOA Measure T-13 is considered a feasible mitigation measure for the proposed project.

T17 – Provide Pedestrian Network Improvement

Measure T-17 would:

> increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT and GHG emissions.

This measure could reduce GHG emissions and VMT up to 6.4%. However, due to the low population within Nubieber and the distance to next adjacent communities (e.g., Bieber or McArthur), it is unlikely that a significant number of employees (if any) would both live within walking distance and work at the Lassen Facility. As such, improvements to the transportation network encouraging people to walk instead of drive in this specific community would not be likely to result in notable VMT reductions. CAPCOA Measure T-17 would not be considered a feasible mitigation measure to reduce VMT impacts.

Although the implementation of CAPCOA Measures T-11 and T-13 would result in a reduction to VMT, the project's VMT impacts related to the Lassen facility would be **potentially significant**.

Tuolumne Facility

The following screening criteria were analyzed per the August 4, 2020, Tuolumne County VMT Thresholds Resolution and Staff Report (County of Tuolumne 2020). Any one of the following criteria would need to be satisfied in order to screen-out of significant VMT impacts:

- ***Residential, Office, or Industrial Employment Project Located within a Low VMT Area Screening:*** Development in a low VMT generating area as defined by the TCTC VMT maps, and that is consistent with consistent with the County General Plan and the RTP.

The baseline average office/industrial VMT per employee values within the Lake Don Pedro Subarea were reviewed per the County VMT Resolution to determine whether the proposed project would be in a low VMT-generating area. A map of the low-VMT areas, generated by comparing locations within each subarea to the overall County average VMT per employee, are provided in Attachment B of the County VMT Resolution. A summary of the Lake Don Pedro Subarea compared to the County's VMT per employee average is provided in Table 3.14-7 below. Consistent with the County's Office/Industrial VMT per Employee Subareas low-VMT Screening Map, the project site would not be located in a low VMT generating area; therefore, the project *cannot* be screened out from further VMT analysis using the low VMT area screening criterion.

Table 3.14-7. Summary of Project Area VMT

Base Year (2023)	VMT[1]
VMT Per Employee	
Subarea Average (Lake Don Pedro Subarea)	100.4
County Average	53.3
% Difference (Project Subarea – County)	**+88.5%**
Threshold	53.3

Source: Appendix I3
Note: VMT = vehicle miles traveled
1 Attachment A (Baseline Average VMT for Subareas) of the Tuolumne County SB 743 VMT Thresholds Study (County of Tuolumne 2020) (Attachment B)

- ***Small Project (Less than 110 daily trips and consistent with the General Plan):*** As noted in Table 3.14-1, the proposed project would employee 51 workers per day at the Tuolumne Facility, generating approximately 102 daily trips. Therefore, the project would meet the criteria for projects generating less than 110 daily trips and *can* be screened-out from further VMT analysis under this criterion.
- ***Local serving retail less than 50,000 SF:*** The project is not a retail land use; therefore, it *cannot* screened-out from further VMT analysis under this criterion.
- ***Local Serving Public Facility:*** Projects which serve the local community (e.g., public K-12 schools, local parks, libraries, post offices, police stations, utility buildings, etc.) and have the potential to reduce VMT should not be required to complete a VMT assessment. The project would not be categorized as a local serving land use due to its nature as a pellet processing facility and *cannot* be screened-out from further VMT analysis under this criterion.
- ***Affordable Housing (100% of units):*** The proposed project does not include affordable housing units. Therefore, the project *cannot* be screened-out from further VMT analysis under this criterion.
- ***Mixed-Use Project:*** The proposed project would not be considered mixed-use. Therefore, the project *cannot* be screened-out from further VMT analysis under this criterion.
- ***Redevelopment Project:*** The proposed project would not be considered a redevelopment project. Therefore, the project *cannot* be screened-out from further VMT analysis under this criterion.

As this project meets the Small Project screening criteria, and the project is consistent with the General Plan land use designation of HI, the Tuolumne Facility would have a **less than significant** impact to VMT.

Transport to Market

Port of Stockton Terminal

The addition of the GSNR facility, which would employ eight (8) daily GSNR employees over three shifts, and reqire an additional eight (8) full-time equivalent stevedores for ship loading,, would result in a less than significant impact on day-to-day port operations.

The following screening criteria were analyzed per the City of Stockton TIA Guidelines (May 2023). Any one of the following criteria would need to be satisfied in order to screen-out of significant VMT impacts:

- **Transit Priority Areas (TPA):** The project is not located near a major transit stop or high-quality transit corridor; therefore, it *cannot* be screened-out from further VMT analysis under this criterion.
- **Affordable Housing:** The project is not a housing project; therefore, it *cannot* be screened-out from further VMT analysis under this criterion.
- **Small Projects:** As noted above, the proposed project would employee 16 workers per day at the Port's GSNR facility, generating approximately 32 daily trips. Therefore, the project would meet the criteria for projects generating less than 110 daily trips and *can* be screened-out from further VMT analysis under this criterion.
- **Locally Serving Public Facility:** The project is not encompasses government, civic, cultural, health, and infrastructure uses and activity which contribute to and support community needs; therefore, it *cannot* be screened-out from further VMT analysis under this criterion.
- **Neighborhood-Serving Retail Project:** The project is not a retail land use; therefore, it *cannot* be screened-out from further VMT analysis under this criterion.
- **Low VMT Area:** Development in a low VMT generating area for office/employment uses, as defined by the Daily Home-Based-Work VMT per Employee map (Figure 3 in the City's TIA Guidelines). The Port of Stockton is not located within a low VMT area per the City's TIA Guidelines screening map; therefore, it *cannot* be screened-out from further VMT analysis under this criterion.
- **General Plan and Zoning Consistency:** The City's VMT Guidance also allows for exemptions from further VMT impact analysis if the projects achieve the following:
  - Projects consistent with the General Plan and Zoning that do not require a General Plan land use map amendment.
  - Projects that do not require an EIR for project related impacts beyond the General Plan EIR.
  - Projects located within the Greater Downtown Planning area, as defined in the General Plan, and shown in Figure 2 (of the City's TIA Guidelines), and do not require a land use map amendment or EIR

The GSNR facility within the Port is consistent with the WCDP and City's General Plan; however, the project requires an EIR for impacts not described in the General Plan EIR, therefore, it *cannot* be screened-out from further VMT analysis under this criterion.

As this project meets the Small Project screening criteria, and the project is consistent with the WCDP and City's General Plan, the GSNR Facility at the Port of Stockton would have a **less than significant** impact to VMT.

Impact TRF-3 The project could substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Feedstock Acquisition

Sustainable Forest Management Projects

As noted above, use of a National Forest System Road for commercial hauling is prohibited without a Road Use Permit or written authorization. Moreover, PDF-TRF-1 requires preparation of a Traffic Management Plan containing measures to reduce potential traffic obstructions, hazards, and service level degradation whenever needed to ensure adherence to jurisdictional standards. As GSNR will operate under Project Design Features that require compliance with all applicable laws (see Section 2.4), and therefore adherence to U.S. Forest Service and state laws (e.g., Road Use Permits) would be required, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be **less than significant**.

Wood Pellet Production

Lassen Facility

Site Access

Vehicular and truck traffic access into the site will be provided via two existing roadways from SR-299 (analyzed as intersections #1 and #2 in the TIS), as shown in Figure 1, Project Location and Study Area, of the TIS (Appendix I2). All study area intersections have been analyzed as unsignalized intersections with stop control at the minor approach.

The following intersections will provide direct access to the project site:

- Intersection #1 via Babcock Road – full access; trucks
- Intersection #2 via 4th Street to Washington Avenue – full access; passenger vehicles

The three county roads accessing the project site from Highway 299 (4th Street, Washington Avenue, and Babcock Road) are classified as paved rural streets as described in Lassen County Code § 16.32.090 (3)(B). The current Lassen County road standard applicable to such roads would be 24 feet AC paved edge to edge with a 2 foot unpaved shoulder. Minimum thickness for AC would be .33 feet compacted and 6 inches compacted road base (Lassen County 2024).

The project does not include any alteration of the geometric design features of any of these roads, and will not introduce any incompatible uses. All of these roads are presently used for automobile traffic, and some truck traffic currently operates along Babcock Road to the existing railyard to the south. Although the project will not substantially increase hazards on any of these roads, additional project-related truck traffic on Babcock Road may result in an increased rate of deterioration of this roadway, which would conflict with Lassen County General Plan Policy CE-10, as discussed in Impact TRF-1. Mitigation Measure **MM-TRF-2** would ensure that the project-related truck traffic on Babcock Road does not result in the road failing to meet county road standards at any time during the life of the project.

Off-Site Queuing Analysis

A queuing analysis was performed for all study intersections analyzed in the TIS (see Appendix I2) to assess vehicle queues along the roadways, specifically at intersections with Caltrans facilities. The queuing analysis was performed for the Existing/Existing plus Project, and Opening Year (2025)/ Opening Year (2025) plus Project conditions, using Synchro/SimTraffic software, as summarized below. All SimTraffic queuing reports are provided in the TIS in

Appendix I2. A queuing impact may occur if intersection turning movements are anticipated to generate queues greater than the available stacking distances and/or if they would impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for analyzed peak hour traffic conditions. Traffic would not be considered to impede flow if queues extend one (1) to two (2) vehicles into an adjacent lane at a stop-controlled intersection.

Existing Plus Project Conditions

As shown in Table 3.14-8, Peak-Hour Queuing Summary for Existing plus Project Conditions, all intersection turning movements are anticipated to operate within available stacking distances and/or would not impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for the Existing plus Project traffic conditions. Although some queues extend approximately one vehicle length beyond right-turn pockets (or defacto right-turn lanes) at two intersections, these queues would not be considered a queuing or safety issue and as noted in Table 3.14-8 below. As such, there are no turning movements to and/or from SR-299 that are anticipated to experience queuing and/or safety issues during the weekday AM or weekday PM peak hours under Existing plus Project traffic conditions. Impacts would be less than significant.

Opening Year (2025) Plus Project Conditions

As shown in Table 3.14-9, Peak-Hour Queuing Summary for Opening Year (2025) plus Project Conditions, all intersection turning movements are anticipated to operate within available stacking distances and/or would not impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for the Opening Year (2025) plus Project traffic conditions. Although some queues extend approximately one vehicle length beyond right-turn pockets (or defacto right-turn lanes) at two intersections, these queues would not be considered a queuing or safety issue and as noted in Table 3.14-9 below. As such, there are no turning movements to and/or from SR-299 that are anticipated to experience queuing and/or safety issues during the weekday AM or weekday PM peak hours under Opening Year (2025) plus Project traffic conditions. Impacts would be less than significant.

Table 3.14-8. Peak-Hour Queuing Summary for Existing Plus Project Conditions

No.	Intersection	Movement	Available Stacking Distance (Feet)	Existing (2023)				Existing plus Project			
				95th Percentile Queue (Feet)		Exceeds Storage Length?[1]		95th Percentile Queue (Feet)		Exceeds Storage Length?[1]	
				AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
1	SR-299-Lassen State Hwy/Babcock Road	WBLT	315	0	0	No	No	41	42	No	No
		WBR	25	0	0	No	No	50	52	**Yes[2]**	**Yes[2]**
		SBLTR	465	0	0	No	No	8	8	No	No
2	SR-299-Lassen State Hwy/4th Street	WBLT	315	0	0	No	No	25	0	No	No
		WBR	25	12	0	No	No	41	0	**Yes[2]**	No
		SBLTR	100	0	0	No	No	12	6	No	No
3	SR-299-Lassen State Hwy/Roosevelt Avenue	WBL	740	0	7	No	No	0	4	No	No
		WBR	25	0	15	No	No	0	16	No	No
		SBLT	600	0	0	No	No	0	4	No	No
4	SR-299-Lassen State Hwy/Adams Avenue	WBR	200	0	0	No	No	0	19	No	No
		SBLT	-[3]	0	19	No	No	0	0	No	No

Source: Appendix I2

Notes: XBL = [DirectionBound]left; XBR = [DirectionBound]right; XBT = [DirectionBound]through; XBLTR = [DirectionBound]left-through-right; XBLT = [DirectionBound]left-through

1 Stacking distance would be exceeded if the required stacking distance is greater than the stacking distance provided.

2 **Yes** – Queue extends past available pocket length for movement (measured as a 25-foot defacto right turn lane) but only extends approximately one vehicle length into the through (or left) turning lane.

3 No nearby driveway, intersection, or striped stacking area identified within 1,000 feet upstream of movement.

Table 3.14-9. Peak-Hour Queuing Summary for Opening Year (2025) Plus Project Conditions

No.	Intersection	Movement	Available Stacking Distance (Feet)	Opening Year (2025)				Opening Year (2025) plus Project			
				95th Percentile Queue (Feet)		Exceeds Storage Length?[1]		95th Percentile Queue (Feet)		Exceeds Storage Length?[1]	
				AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
1	SR-299-Lassen State Hwy/Babcock Road	WBLT	315	0	0	No	No	40	41	No	No
		WBR	25	0	0	No	No	49	50	**Yes**[2]	**Yes**[2]
		SBLTR	465	0	0	No	No	8	10	No	No
2	SR-299-Lassen State Hwy/4th Street	WBLT	315	0	0	No	No	24	0	No	No
		WBR	25	13	0	No	No	39	0	**Yes**[2]	No
		SBLTR	100	0	0	No	No	11	8	No	No
3	SR-299-Lassen State Hwy/Roosevelt Avenue	WBL	740	0	7	No	No	0	4	No	No
		WBR	25	0	14	No	No	0	16	No	No
		SBLT	600	0	0	No	No	0	4	No	No
4	SR-299-Lassen State Hwy/Adams Avenue	WBR	200	0	0	No	No	0	20	No	No
		SBLT	-[3]	0	17	No	No	0	5	No	No

Source: Appendix I2

Notes: XBL = [DirectionBound]left; XBR = [DirectionBound]right; XBT = [DirectionBound]through; XBLTR = [DirectionBound]left-through-right; XBLT = [DirectionBound]left-through

1 Stacking distance would be exceeded if the required stacking distance is greater than the stacking distance provided.

2 **Yes** – Queue extends past available pocket length for movement (measured as a 25-foot defacto right turn lane) but only extends approximately one vehicle length into the through (or left) turning lane.

3 No nearby driveway, intersection, or striped stacking area identified within 1,000 feet upstream of movement.

Deceleration Lane Warrants

As shown in Tables 3.14-8 and 3.14-9 and detailed above, there are no left-turning movements along SR-299 that are anticipated to experience significant peak hour queuing. All southbound left-turning movements are less than 25-feet, which is indicative of free-flowing movements from the highway onto minor streets (e.g., reported queue lengths are primarily a result of a vehicle slowing down to turn, rather than a vehicle waiting in the through-lane as the vehicle waits for a gap in on-coming traffic to safely maneuver the crossing). As such, it would not be expected that a separate left-turn or deceleration lane along SR-299 would be warranted.

A deceleration lane warrant analysis is included in the Lassen TIS (Appendix I2) to further verify these conclusions. Based on projected peak hour volumes at the largest volume intersection in the study area, Caltrans provided a review of AASHTO Table V-1 Warrants for left-turn on two-lane highways, and concluded that the project conditions would not meet the warrant for left-turn channelization as the expected volumes were approximately ¼ of the warrant volume. [13]

Additionally, a review of deceleration lane warrants was also conducted using Figure 4-12 (Volume Warrants for Left-Turn Lanes at Unsignalized Intersections) for 50 mph roadways from NCHRP Report 279 (TRB 1985). The left-turn lane warrant is not met under the highest volumes conditions (Opening Year (2025) plus Project) at the project access intersections (Babcock Road and 4th Street) with SR-299. NCHRP worksheets are provided in Appendix F of Appendix I2.

Collision Analysis

A collision analysis was conducted to determine if there is crash history along SR-299 at the intersections used for site access (Babcock Road for truck access and 4th Street to Washington Avenue for passenger vehicle access). A 5-year review of available crash data (January 2019 to March 2024) was reviewed using data from the Transportation Injury Mapping System (TIMS) provided by the Statewide Integrated Traffic Records System (SWITRS) and the University of California, Berkeley. Ten (10) crashes were reported over the last five (5) years, within a 5-mile radius of the project site. Of those crashes, none were recorded at the project site access intersections, or within the town of Nubieber. Reviewed data showing the locations of the 10 crashes, along with their detailed reports, is compiled in Appendix F of Appendix I2. Additionally, Caltrans District 2 provided a Table B 5-yr collision analysis and found no collision reported on any of the studied intersections, or within the general vicinity of the project.[13] No further collision analysis is warranted.

Highway Signage

Existing signage along the stretch of SR-299 in the study area is limited to informational/directional signage, posted speed limit signs in either direction prior to Nubieber, and one pedestrian crossing sign (W11-2) for southbound traffic located between Roosevelt Avenue and Front Street.

As detailed in this chapter, the limited queuing, unmet warrants for left-turn/deceleration lanes, and lack of collision history at the project access intersections indicate that traffic operations in this area would not require additional control. Additionally, both through and turning movements along SR-299 reflect low traffic volumes under peak hour conditions, with and without project conditions. However, as the project would increase southbound left- and northbound right-turning movements from three (3) or fewer trips (with the majority of turning movements currently reported with 0 peak hour trips) to up to 26 trips at the highest turning movement on Babcock Road, additional

[13] Per email correspondence with the Local Development Review Coordinator, Caltrans District 2, July 18, 2024.

signage is warranted to inform drivers of additional truck traffic entering or exiting the highway. Mitigation Measure **MM-TRF-3** will ensure that the public is informed of added project-related traffic to and from SR-299.

Project impacts related to highway warning signage would be **potentially significant**, but would be addressed through Mitigation Measure **MM-TRF-3**.

Tuolumne Facility

Site Access

Vehicular and truck traffic access into the site will be provided via two existing roadways from La Grange Road – CR J59 (analyzed as intersections #2 and #3 in the TIS), as shown in Figure 1, Project Location and Study Area, in the TIS. All study area intersections have been analyzed as unsignalized intersections with stop control at the minor approach where applicable.

The following intersections will provide direct access to the project site:

- Intersection #2 via SA Driveway North (currently undeveloped) – full access; passenger vehicles
- Intersection #3 via SA Driveway North (currently operational) – full access; trucks

Truck traffic will utilize the SR-108/120 intersection with La Grange Road to the north (Intersection #1) and the SR-132 intersection with La Grange Road to the south (Intersection #4) to access the site via the existing driveway noted above (Intersection #3). (Truck traffic is prohibited on Red Hill Road between SR-120 and La Grange Road, and project-related trucks consequently will not use that road.)

In Tuolumne County, SR-108 and SR-120 have terminal access, and allow the use of both STAA and California legal trucks. However, in Mariposa County, SR-120 allows only trucks that are no longer than 65 feet as per the kingpin-to-rear-axle (KRPA) advisory. Additionally, SR-132 to the south is a Caltrans designated truck route; however, east of the City of Modesto, SR-132 allows only trucks that are no longer than 65 feet as per the California Legal Route, and east of the La Grange Road intersection, a 30-foot kingpin to rear axle (KPRA) advisory sign is posted.

To verify that sufficient turning radii and pavement right-of-way (ROW) is available, a truck turn analysis using AutoTURN 2024 software has been completed to show the largest potential trucks (chip trucks) accessing the site, along with the most common log trucks.

- **WB-62 Truck (Project Chip Trucks):** AASHTO WB-62 design vehicles are representative of "Green" STAA Trucks allowed on SR-108/120 with a 48-foot semitrailer. Although up to 53-foot maximum semitrailers are allowed along on STAA routes, project operations would not include trucks larger than a WB-62. As shown in Figure 16 of the TIS the WB-62 design vehicle would be able to maneuver the major highway intersections within the pavement provided, although may encroach over lane striping. It must be noted that the project is unlikely to utilize the La Grange Road/SR-132 intersection to the south for any project chip truck operations. The standard WB-62 design vehicle turning template is included to provide a conservative analysis at both intersections.
- **WB-62 Truck with 30-foot KPRA and 44-foot semitrailer (Project Chip Trucks):** AASHTO WB-62 design vehicle, modeled with an adjustment to the semitrailer length to represent a "Black" California Legal Truck, with an overall length of 65 feet. Additionally, due to the 30-foot KPRA advisory noted on SR-132 east of La Grange Road, an additional adjustment has also been made. As shown in Figure 17 of the TIS the WB-62

design vehicle with 30-foot KPRA adjustment would also be able to maneuver the major highway intersections within the pavement provided, with a slightly better turning radius than the standard WB-62, although may continue to encroach over lane striping. As noted above, the project is unlikely to utilize the La Grange Road/SR-132 intersection to the south for any project chip truck operations. This turning template, modeled with an adjustment to the overall length and KPRA given the advisory on SR-132, is included to provide a more representative truck for project operations at both intersections.

- Transcraft 45-foot Flatdeck (Project Pulp Log Trucks): A Transcraft TL-2000 45-foot flatdeck truck from has been used to represent the 45-foot fixed-axle pulp log trailers used in the project's logging operations. This truck represents the most common truck to be used in logging operations as most roundwood logs range from 16- to 20-feet long. As shown in Figure 18 of the TIS, this 45-foot fixed-axle truck would be able to maneuver the major highway intersections within the pavement provided, although may continue to encroach over some lane striping.
- Transcraft 45-foot Flatdeck with Rear Axle Steering (Project Standard Log Trucks): The Transcraft TL-2000 45-foot flatdeck truck, modeled with rear axle steering and a 35-foot distance between axles (representing the placement of upright log "bunks"), has been used to represent the standard log trailers used in the project's logging operations, representing approximately 30- to 40-percent of project log trucks. As shown in Figure 19 of the TIS, these log trucks with rear axle steering have the greatest maneuverability, and would encroach over minimal lane stripping.

Although the largest design trucks included in this turn analysis may encroach over lane striping, sufficient pavement ROW is provided at both intersections such that trucks would not be required to encroach into opposing traffic waiting at stop-controlled approaches (e.g., La Grange Road approach to SR-108/120 and SR-132 westbound approach to La Grange Road). This would not be considered a substantial increase to hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, and impacts would be **less than significant**.

Additionally, the proposed employee access road would be located along an existing (gated) driveway, currently overgrown and not utilized for vehicles. The alignment extends from La Grange Road, and would cross the railroad tracks at an at-grade crossing approximately 65-feet from the current edge of lane striping. This crossing would be designed consistent with the Public Utilities Commission Regulation, General Order No. 75-D (7), as described under Impact TRF-1. The project site property is subject to a recorded agreement for utilization of the railroad crossing at Mile Post 29.5 of the Oakdale-Sonora Branch, dated March 20, 2014. The agreement is effective for 20 years, and would not require renewal until 2034. As this agreement is in effect and improvements would be designed consistent with PUC regulations, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, and impacts would be **less than significant**.

Off-Site Queuing Analysis

A queuing analysis was performed for all study intersections analyzed in the TIS (see Appendix I3) to assess vehicle queues along the roadways, specifically at intersections with Caltrans facilities. The queuing analysis was performed for the Existing/Existing plus Project, and Opening Year (2025)/ Opening Year (2025) plus Project conditions, using Synchro/SimTraffic software, as summarized below. All SimTraffic queuing reports are provided in the TIS in Appendix I3. A queuing impact may occur if intersection turning movements are anticipated to generate queues greater than the available stacking distances and/or if they would impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for analyzed peak hour traffic conditions. Traffic

would not be considered to impede flow if queues extend one (1) to two (2) vehicles into an adjacent lane at a stop-controlled intersection.

Existing Plus Project Conditions

As shown in Table 3.14-10, Peak-Hour Queuing Summary for Existing plus Project Conditions, all intersection turning movements are anticipated to operate within available stacking distances and/or would not impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for the Existing plus Project traffic conditions. Although some queues extend approximately one vehicle length beyond right-turn pockets (or defacto right-turn lanes) at one intersection, these queues would not be considered a queuing or safety issue and as noted in Table 3.14-10 below. As such, there are no turning movements to and/or from any Caltrans facilities that are anticipated to experience queuing and/or safety issues during the weekday AM or weekday PM peak hours under Existing plus Project traffic conditions. Impacts would be less than significant.

Opening Year (2025) Plus Project Conditions

As shown in Table 3.14-11, Peak-Hour Queuing Summary for Opening Year (2025) plus Project Conditions, all intersection turning movements are anticipated to operate within available stacking distances and/or would not impede flow along major movements during the peak hours based on the 95th percentile peak hour traffic flows for the Opening Year (2025) plus Project traffic conditions. Although some queues extend approximately one vehicle length beyond right-turn pockets (or defacto right-turn lanes) at one intersection, these queues would not be considered a queuing or safety issue and as noted in Table 3.14-11 below. As such, there are no turning movements to and/or from any Caltrans facilities that are anticipated to experience queuing and/or safety issues during the weekday AM or weekday PM peak hours under Opening Year (2025) plus Project traffic conditions Impacts would be less than significant.

Table 3.14-10. Peak-Hour Queuing Summary for Existing Plus Project Conditions (Tuolumne Facility)

No.	Intersection	Movement	Available Stacking Distance (Feet)	Existing (2023)				Existing plus Project			
				95th Percentile Queue (Feet)		Exceeds Stacking Distance?[1]		95th Percentile Queue (Feet)		Exceeds Stacking Distance?[1]	
				AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
1	SR-120 – SR-108/La Grange Road – CR J59	WBL	500	47	36	No	No	50	42	No	No
		WBR	200	43	47	No	No	45	43	No	No
		NBR	130	0	49	No	No	0	18	No	No
		SBL	475	52	0	No	No	62	56	No	No
2	Site Employee Dwy/La Grange Road – CR J59	EBLT	500	0	0	No	No	17	15	No	No
		SBLR	50	0	0	No	No	32	0	No	No
3	Site Truck Dwy/La Grange Road – CR J59	EBL	300	5	8	No	No	18	19	No	No
		SBLR	150	21	0	No	No	42	36	No	No
4	La Grange Road – CR J59/Yosemite Boulevard – SR-132	EBLT	1200	38	47	No	No	40	47	No	No
		WBLT	1000	42	38	No	No	43	41	No	No
		NBLT	270	43	43	No	No	43	44	No	No
		NBR	25	35	29	**Yes[2]**	**Yes[2]**	36	29	**Yes[2]**	**Yes[2]**
		SBLT	220	45	46	No	No	44	45	No	No
		SBR	25	41	46	**Yes[2]**	**Yes[2]**	40	46	**Yes[2]**	**Yes[2]**
5	Red Hill Road/Montezuma Road – SR-49 – SR-120	WBLT	180	0	6	No	No	0	12	No	No
		NBL	215	18	20	No	No	17	16	No	No
		NBR	50	21	17	No	No	21	13	No	No

Source: Appendix I3

Notes: XBL = [DirectionBound]left; XBR = [DirectionBound]right; XBT = [DirectionBound]through; XBLTR = [DirectionBound]left-through-right; XBLT = [DirectionBound]left-through

1 Stacking distance would be exceeded if the required stacking distance is greater than the stacking distance provided.

2 **Yes** – Queue extends past available pocket length for movement (measured as a 25-foot defacto right turn lane) but only extends approximately one vehicle length into the through (or left) turning lane.

Table 3.14-11. Peak-Hour Queuing Summary for Opening Year (2025) Plus Project Conditions

No.	Intersection	Movement	Available Stacking Distance (Feet)	Opening Year (2025)				Opening Year (2025) plus Project			
				95th Percentile Queue (Feet)		Exceeds Stacking Distance?[1]		95th Percentile Queue (Feet)		Exceeds Stacking Distance?[1]	
				AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1	SR-120 – SR-108/La Grange Road – CR J59	WBL	500	53	56	No	No	99	46	No	No
		WBR	200	49	45	No	No	50	45	No	No
		NBR	130	0	0	No	No	0	11	No	No
		SBL	475	62	64	No	No	65	71	No	No
2	Site Employee Dwy/La Grange Road – CR J59	EBLT	500	0	0	No	No	22	13	No	No
		SBLR	50	0	0	No	No	35	0	No	No
3	Site Truck Dwy/La Grange Road – CR J59	EBL	300	7	10	No	No	24	19	No	No
		SBLR	150	20	0	No	No	42	39	No	No
4	La Grange Road – CR J59/Yosemite Boulevard – SR-132	EBLT	1200	39	48	No	No	40	50	No	No
		WBLT	1000	45	42	No	No	48	40	No	No
		NBLT	270	45	42	No	No	41	42	No	No
		NBR	25	34	27	**Yes[2]**	**Yes[2]**	36	31	**Yes[2]**	**Yes[2]**
		SBLT	220	48	53	No	No	46	54	No	No
		SBR	25	43	52	**Yes[2]**	**Yes[2]**	44	51	**Yes[2]**	**Yes[2]**
5	Red Hill Road/Montezuma Road – SR-49 – SR-120	WBLT	180	0	4	No	No	0	12	No	No
		NBL	215	18	18	No	No	21	14	No	No
		NBR	50	22	17	No	No	21	15	No	No

Source: Appendix I3

Notes: XBL = [DirectionBound]left; XBR = [DirectionBound]right; XBT = [DirectionBound]through; XBLTR = [DirectionBound]left-through-right; XBLT = [DirectionBound]left-through

1 Stacking distance would be exceeded if the required stacking distance is greater than the stacking distance provided.

2 **Yes** – Queue extends past available pocket length for movement (measured as a 25-foot defacto right turn lane) but only extends approximately one vehicle length into the through (or left) turning lane.

Transport to Market

Port of Stockton Terminal

As noted above, the Port of Stockton is a fully operational port. The addition of the GSNR facility would add approximately eight (8) daily employees, four (4) in the day shift, and two (2) each in the swing shift and night shift. GSNR operations would add on average, one daily train trip to the Port. In addition, eight (8) full-time equivalent stevedores would be required during ship loading operations. No additional haul truck trips would result from the project. No additional roadway improvements would be required. Additional on-site railway sidings would be constructed at the GSNR site. However, these sidings would not create additional roadway crossings or conflicts with vehicular traffic. The project facility would be located on a parcel of partially developed land within the existing West Complex, is served by existing roadways, and would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment Material transfer from trains to the proposed storage facility would occur on new track sidings that would not affect roadways within the Port. As discussed in Impact TRF-1, the addition of up to one additional train trip per day to the Port of Stockton would not significantly affect existing on or off-site rail crossings. Impacts would be **less than significant**.

Impact TRF-4 The project would not result in inadequate emergency access.

Feedstock Acquisition

Sustainable Forest Management Projects

As noted above, the acquisition of feedstock would occur in strict accordance with land management agreements, best available science, and best available control technologies, and pursuant to the stewardship agreements between GSFA and the U.S. Forest Service and state law, where applicable. As GSNR will operate in conjunction with LTOs and Third Party Operations for feedstock acquisition, where adherence to U.S. Forest Service and state laws (e.g., Road Use Permits) would be required, the project would not result in inadequate emergency access. Impacts would be **less than significant**.

Wood Pellet Production

Lassen Facility

As previously discussed, access to the project site would be provided via driveways from SR-299, utilizing the existing SR-299/Babcock Road intersection for truck access and the existing SR-299/4th Street intersection for employee access. In the event of an emergency, emergency vehicles would be able to access the site from SR-299 at Babcock Road, 4th Street, along with additional access points at Roosevelt Avenue, Adams Avenue, and Washington Avenue. All on-site improvements will be designed with adequate width, turning radius, and grade to facilitate access by County's firefighting apparatus, and to provide alternative emergency ingress and egress. The site plan would be subject to plan review by the County's Fire Department to ensure proper access for fire and emergency response is provided and required fire suppression features are included. Therefore, the project's impact due to inadequate emergency access would be **less than significant.**

Tuolumne Facility

As previously discussed, access to the project site would be provided from the SR-120-SR-108/La Grange Road-CR J59 intersection, and at driveways along La Grange Road, utilizing the existing southerly driveway to the SA site for

truck access and the existing northerly driveway for employee access. The northerly driveway would be paved and improved to meet the County's access standards. All project access improvements would be reviewed by Tuolumne County. This approach would ensure compliance with all applicable design requirements. As mentioned above, the project has two main access roadways into the site, and in the event of an emergency, both driveways would enable vehicles to enter/exit the project site. In the event of an emergency during switching, in which the northern driveway may be blocked for up to eight (8) minutes, access to the site would continue to be available at the southern driveway. The nearest fire station (Cal Fire Green Springs Station) is located south of the site and southeast of the train tracks, which would further enable emergency access to the site in the event a train is crossing La Grange Road and/or the northern driveway. All on-site improvements will be designed with adequate width, turning radius, and grade to facilitate access by County's firefighting apparatus, and to provide alternative emergency ingress and egress. The site plan would be subject to plan review by the County's Fire Department to ensure proper access for fire and emergency response is provided and required fire suppression features are included. Therefore, the project's impact due to inadequate emergency access would be **less than significant**.

Transport to Market

Port of Stockton Terminal

The Port of Stockton is a fully operational port. The addition of the GSNR facility, which would operate with approximately eight (8) daily employees and an additional eight (8) full-time equivalent stevedores required for ship loading, and add approximately one daily train trip, would result in a negligeable impact on day-to-day port traffic operations, and would continue to provide emergency access throughout the entirety of the port, the West Complex, and the proposed GSNR facility. Impacts would be **less than significant**.

3.14.4.3 Cumulative Impacts

Feedstock Acquisition

Sustainable Forest Management Projects

Other vegetation management projects, as described in Section 3.0, would occur within Northern California, and would utilize existing roadway networks to access feedstock areas. Although feedstock operations are temporary in nature, and such projects would not require new or expanded infrastructure, variability in location and timing of feedstock acquisition projects, and the possibility of overlap, could result in greater than 110 trips per day. Per the OPR Technical Advisory: "…a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa…" As VMT is cumulative in nature, the proposed project could result in a considerable contribution to a cumulative VMT impact as described in Impact TRF-2.

Wood Pellet Production

Lassen Facility

As described in Section 3.0, no other cumulative projects have been identified near the Lassen Facility that would result in additional strain on the roadway network. However, the Lassen Facility is located in a high VMT generating area within Lassen County, and impacts related to VMT were found to be significant and unavoidable. As noted

above, VMT is cumulative in nature, and the VMT impacts related to operation of the Lassen Facility were found to be potentially significant. Therefore, the proposed project could result in a considerable contribution to a cumulative VMT impact as described in Impact TRF-2.

Tuolumne Facility

As described in Section 3.0, cumulative projects in the project vicinity may add vehicular traffic onto nearby roadways. The addition of cumulative project traffic was incorporated into the Opening Year (2025) operational analysis (see Attachment Xb), and the results of the queuing analysis provided in Chapter 3.14.4.2 under Threshold C incorporate the addition of cumulative traffic. The project was not found to have an impact in hazardous conditions (e.g., queuing), and would therefore not contribute to a cumulatively considerable impact associated with queuing and hazardous design features. Additionally, as noted above, VMT is cumulative in nature, and the VMT impacts related to operation of the Tuolumne Facility were found to be less than significant. Therefore, the proposed project would not result in a considerable contribution to a cumulative VMT impact.

Transport to Market

Port of Stockton Terminal

As described in Section 3.0, other cargo projects are planned within the Port of Stockton. The Port has planned for such expansion in its West Complex Development Plan (WCDP), and accompanying EIR. The WCDP EIR concluded that buildout of the West Complex could result in significant impacts to additional trip generation and increased traffic. The Port implements mitigation and travel demand measures to promote trip reduction and operational impacts to levels of service.

However, the Denmar Addendum to the WCDP EIR (April 2021) notes that a substantial area within the West Complex remains undeveloped and the current developments are Port-dependent bulk, commercial, industrial, and/or warehousing operations, which have generated lower volumes of vehicle trips than anticipated in the WCDP EIR. The Denmar Addendum further notes that as of 2019, only 10,000 daily vehicle trips were recorded compared to the projected 40,000 new daily vehicle trips analyzed in the WCDP EIR for the year 2020. The project would have a negligeable impact to the transportation network with the addition of eight (8) employees, and an additional eight (8) full-time equivalent stevedores required for ship loading, and one added daily train trip to the site and would not significantly contribute to a cumulative transportation impact.

3.14.4.4 Mitigation Measures

Feedstock Acquisition

Sustainable Forest Management Projects

The following mitigation measure **MM-TRF-1** would reduce VMT impacts for the feedstock acquisition projects.

MM-TRF-1 Provide Employee Sponsored Vanpool for Sustainable Forest Management Projects. GSNR would be required to provide, or cause to be provided, vanpooling services consistent with CAPCOA Measure T-11 for workers traveling to jobsites when applicable (i.e., when 5 or more employees with similar work hours live close enough to one another for van pooling to be practicable). A

Transportation Manager shall be designated to coordinate vanpooling for each feedstock acquisition project and provide a report detailing recorded annual vanpool usage to the County.

Wood Pellet Production

Lassen Facility

The following mitigation measure **MM-TRF-2** would verify consistency with Lassen County General Plan Policy CE-6 and CE-10:

MM-TRF-2 Assessment and maintenance of Babcock Road per GP Policies CE-6 and CE-10.

Initial Assessment

The project will be required to conduct an initial pavement assessment of Babcock Road from SR-299 to the project site, prior to commencement of construction of the Lassen Facility.

Biennial Pavement Assessments

Pavement within the designated area of Babcock Road will thereafter be evaluated biennially, commencing at the start of construction of the Lassen Facility, and the results of these analyses will be retained by GSNR.

Assessment Criteria

Each assessment required by the Mitigation Measure shall address the following elements:

- **Pavement Distress Evaluation:** quantification of the distress types, extents, and severities in accordance with the ASTM D6433 standard. A 100% assessment of the construction routes will be performed. If the existing surface is not Asphalt Concrete (AC) or Portland Cement Concrete (PCC), an alternative evaluation method such as the Pavement Surface Evaluation and Rating (PASER) methodology will be used.
- **Pavement Condition Index (PCI):** PCI values will be calculated using collected distress data and reported for both AC and PCC roadways.
- **Photo Survey:** photos of the surface will be collected and provided to the County as part of the analysis.
- **Road Roughness:** measurement of the International Roughness Index (IRI) for each construction route.

Rehabilitation

If, through this assessment, the road is found to require resurfacing, repaving, or reconstruction in order to maintain its pre-project condition, GSNR will be required to resurface, repave, or reconstruct this section of Babcock Road, consistent with the County of Lassen requirements for Road District Four and consistent with Lassen County Code Section 10.32.050 – *Minimum Design Standards for County Road.* The road will be rehabilitated to a condition that allows for carrying 20-year Equivalent Single Axel Load (ESAL) values. (Traffic volumes along this segment

of Babcock Road will be determined from the traffic report contained in this EIR. Forward-looking projections of operational traffic will be also considered to determine the 20-year ESAL count and ensure that the rehabilitated pavement sections are structurally adequate for Project and non-Project traffic.) The post-construction report will be signed and stamped by a California-Licensed Professional Engineer.

The following mitigation measure **MM-TRF-3** would limit the potential for hazardous roadway conditions related to site access to/from the Lassen Facility:

MM-TRF-3 Installation of warning signage along SR-299.

GSNR would be required to install CA MUTCD W2-1 warning signage per applicable standards in advance of Babcock Road and 4th Street along both directions of SR-299.

The following mitigation measure **MM-TRF-4** would reduce VMT impacts for the Lassen Facility and the project asa a whole:

MM-TRF-4 Provide Electric Vehicle Charging Infrastructure and Employee Sponsored Vanpool for the Lassen Facility, Tuolumne Facility, and Port of Stockton. GSNR would be required to provide, or cause to be provided, vanpooling services consistent with CAPCOA Measure T-11 for workers traveling to the Lassen Facility, Tuolumne Facility, and the Port of Stockton facility when applicable (i.e., when 5 or more employees with similar work hours live close enough to one another for van pooling to be practicable). A Transportation Manager shall be designated to coordinate vanpooling at each facility and maintain a record of annual vanpool usage.

Additionally, GSNR would be required to install EV charging at the Lassen Facility, Tuolumne Facility, and the project facility at the Port of Stockton, consistent with CAPCOA Measure T-13. Per Table A5.106.5.3.2 of the 2019 California Green Building Standards, 10 percent of total parking spaces are required to be EV charging spaces to meet Tier 2 standards. The project proponent would be required to exceed the 10 percent EV charging space requirement, consistent with CAPCOA Measure T-13.

Tuolumne Facility

No mitigation measures are required as impacts would be less than significant.

Transport to Market

Port of Stockton Terminal

No mitigation measures are required as impacts would be less than significant.

3.14.4.5 Significance After Mitigation

Impact TRF-1 The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The proposed project components at the feedstock locations, the wood pellet production facilities in Lassen and Tuolumne Counties, and the transport to market at the Port of Stockton, would not result in a significant impact, with the exception of consistency of the Lassen Facility to Lassen County General Plan Policy CE-6 and CE-10. With implementation of mitigation measure **MM-TRF-2**, the potential impact is **less than significant**.

Impact TRF-2 The project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

The proposed project at the pellet production facility in Lassen County and for feedstock acquisition activities would potentially result in a significant impact. Implementation of Mitigation Measures **MM-TRF-1** and **MM-TRF-4** would reduce VMT impacts. However, reductions would not substantially reduce VMT, and implementation may not be feasible in all instances. No additional feasible mitigation measures are available for reduction of VMT impacts, due to the rural nature of the project location, and the need for a workforce from a wide geographic area. Therefore impacts would continue to be **significant and unavoidable**. For the project components at the wood pellet production facility in Tuolumne County, and the transport to market at the Port of Stockton, impacts would be less than significant.

Impact TRF-3 The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

The proposed project components at the feedstock locations, the wood pellet production facilities in Tuolumne County and the transport to market at the Port of Stockton, would not result in a significant impact. Additional truck traffic at the Lassen Facility could result in potentially significant impacts related to adequate warning of passenger traffic. Implementation of Mitigation Measure **MM-TRF-3** would reduce this potential impact to **less than significant**.

Impact TRF-4 The project would not result in inadequate emergency access.

The proposed project components at the feedstock locations, the wood pellet production facilities in Lassen and Tuolumne Counties, and the transport to market at the Port of Stockton, would not result in a significant impact. No mitigation is required, as the potential impact is **less than significant**.

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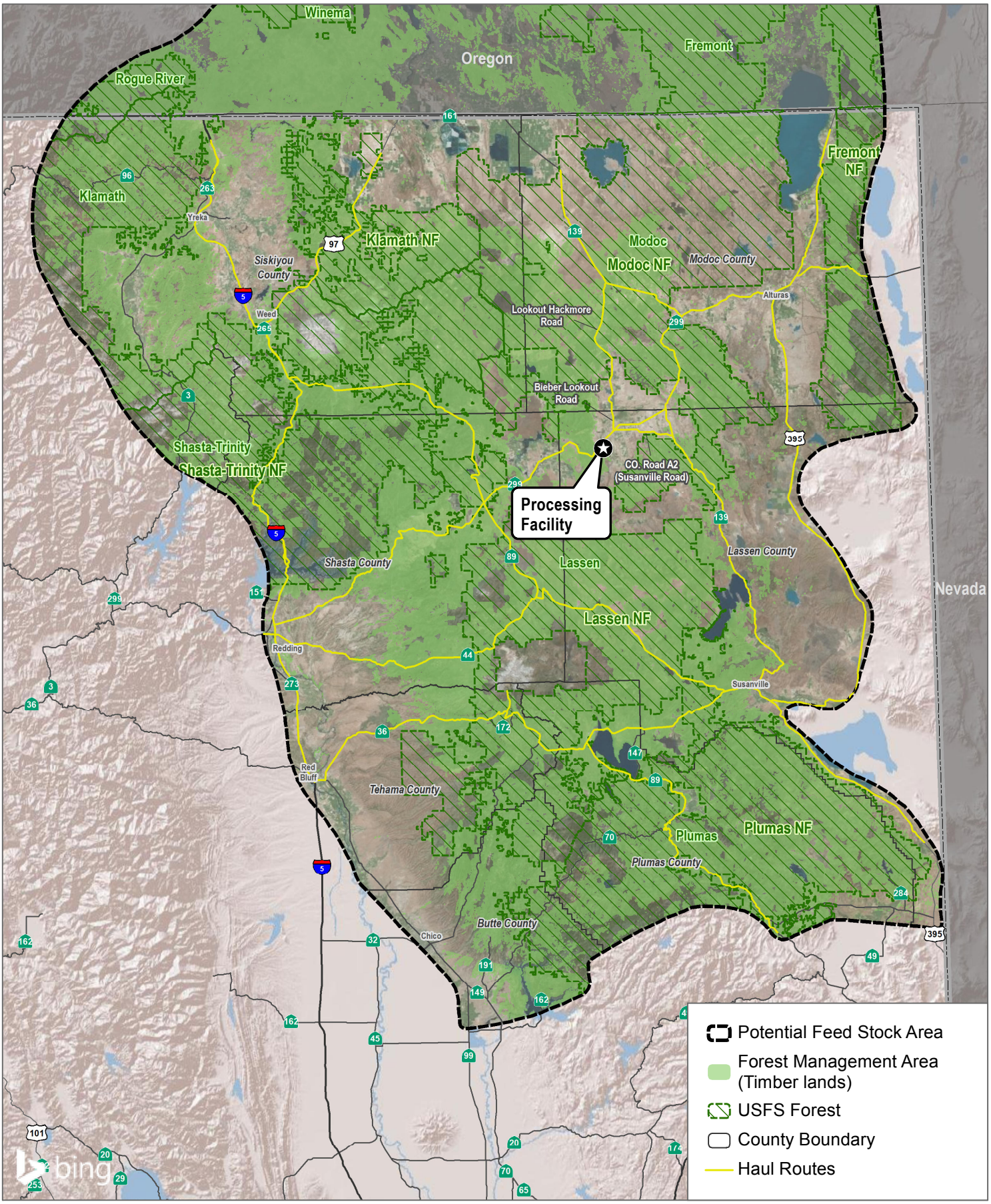


SOURCE: Bing Maps 2022

FIGURE 3.14-1

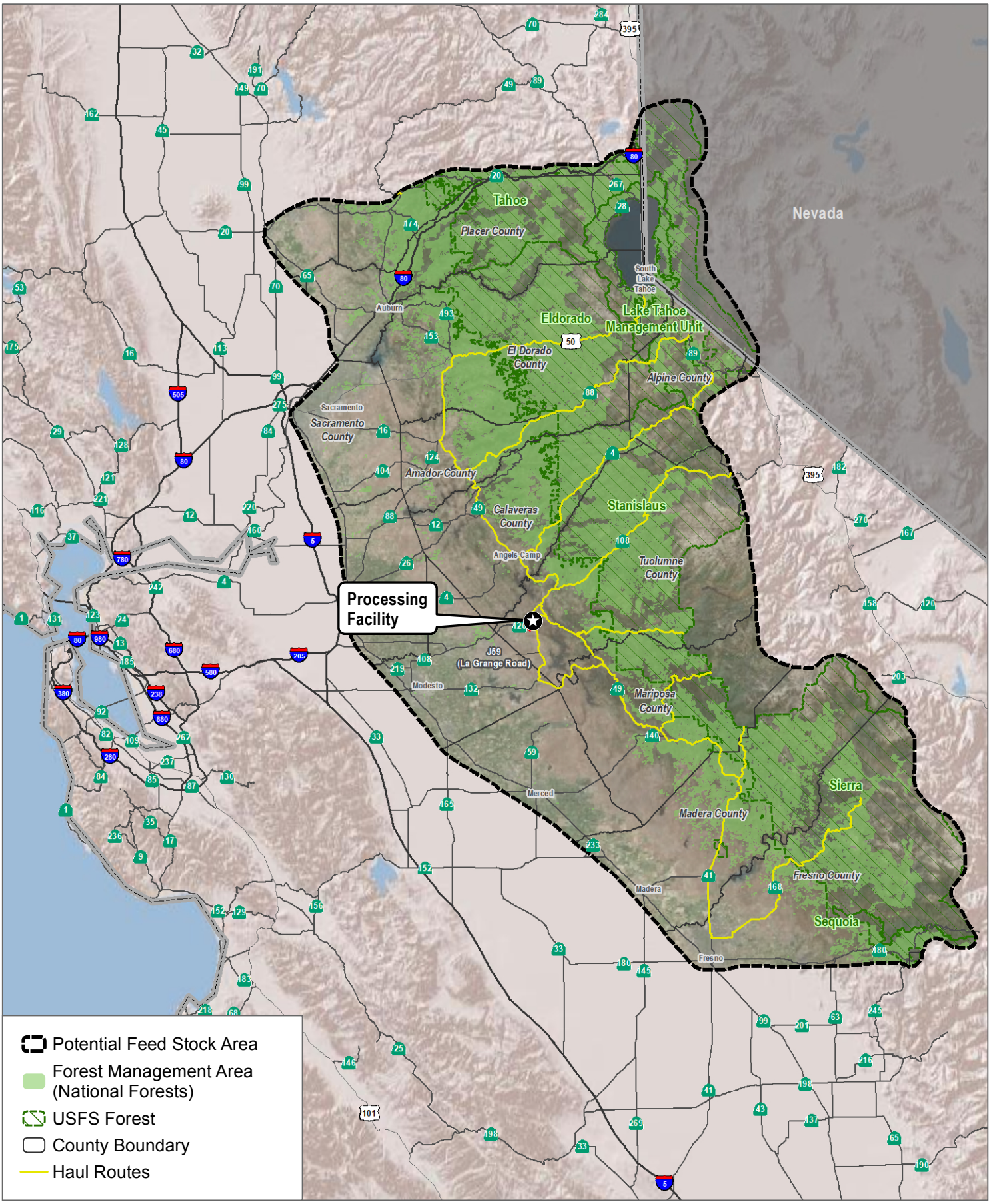
Feed Stock and Haul Routes - Lassen Facility

Golden State Natural Resources Forest Resiliency Demonstration Project

DUDEK

0 10 20 Miles

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps 2022

DUDEK

0 12.5 25 Miles

FIGURE 3.14-2

Feed Stock and Haul Routes - Tuolumne Facility

Golden State Natural Resources Forest Resiliency Demonstration Project

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