Appendix M Traffic/Transportation Analysis for the Proposed Performing Arts Theater, AcCEL Center, and Library Project Tulare County

Appendices

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TRAFFIC/TRANSPORTATION ANALYSIS

FOR THE PROPOSED

PERFORMING ARTS THEATER, AcCEL CENTER, AND LIBRARY PROJECT

TULARE COUNTY

Prepared for

TULARE COUNTY OFFICE OF EDUCATION
&
PLACEWORKS

Prepared by

GARLAND ASSOCIATES
16787 Beach Boulevard, Suite 234
Huntington Beach, CA 92647
714-330-8984

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I.
INTRODUCTION AND STUDY METHODOLOGY

This report summarizes the results of a traffic/transportation analysis that was conducted for the Performing Arts Theater, AcCEL Center, and Library Project proposed by the Tulare County Office of Education (COE). The site for the educational facilities is located on the south side of Liberty Road/Avenue 264 and the west side of N. Mooney Boulevard/State Route 63 in an unincorporated area of Tulare County that is north of the City of Tulare and south of the City of Visalia. A map showing the location of the project site is provided on Figure 1.

The existing COE campus, which includes the Bright Start Program, Hearing Center, Behavioral Health Services, Visually Impaired Program, Alternative Achievement Program, and Planetarium and Science Center, is located to the north and east of the project site. The University Preparatory High School campus is currently located at the College of the Sequoias and will be moved to the current COE campus. An aerial photograph of the existing project site and the nearby roadways is shown on Figure 2 and a conceptual site plan for the proposed facilities is shown on Figure 3. The AcCEL Center and library would be located west of the existing COE campus and would be bounded by Liberty Road/Avenue 264 on the north, a commercial property on the west, and farmland on the south. The performing arts theater would be located south of the existing COE campus and would be bounded by N. Mooney Boulevard/State Route 63 on the east and farmland on the south and west.

The AcCEL Center and library site would have three buildings, a parking lot with 67 spaces, a student drop-off/pick-up area, a bus loading/unloading area, and a paved outdoor basketball court. The AcCEL Center would accommodate up to 80 students, the library would have a capacity of 100 persons, and the AcCEL Center and library would have 25 staff/faculty members. The performing arts theater would have one building and a parking lot with 500 parking spaces. It would have 500 seats and 15 employees.

An analysis has been conducted to evaluate the traffic/transportation impacts of the proposed project. The analysis addresses the impacts on vehicular and pedestrian circulation, access, and safety. The existing and projected traffic conditions on the roadways that provide access to the project site were documented, including an analysis of the before-and-after traffic volumes.

In addition to the traffic/circulation analysis, the study also addressed the transportation issue areas of the CEQA environmental checklist, which includes an evaluation of the project's impacts on 1) a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, 2) vehicle miles traveled (VMT), 3) increased hazards or incompatible uses, and 4) emergency access.

To establish the existing conditions, an inventory was taken of the streets, sidewalks, bike lanes, and public transit routes in the vicinity of the school site. The inventory included physical features such as the number of lanes, types of traffic control devices, and crosswalk locations.

Traffic volumes on the streets in the vicinity of the project site were quantified for the following scenarios: existing conditions (2025), existing conditions plus the proposed project, future baseline

conditions without the proposed project for the target year of 2030, and future conditions with the proposed project. The year 2030 was used for the future target year as that is anticipated to be the year of completion for the project.

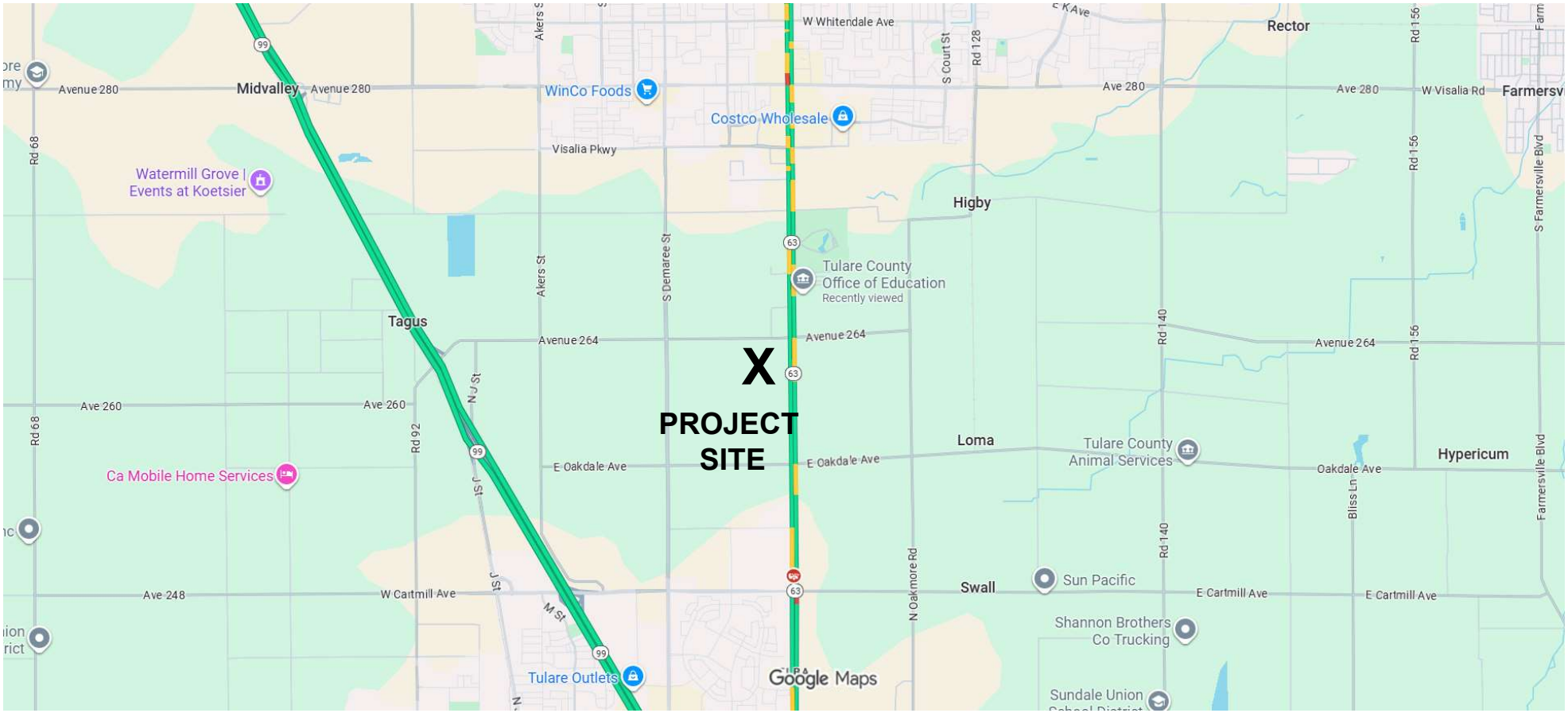

FIGURE 1
LOCATION MAP
AcCEL CENTER, LIBRARY, & THEATER PROJECT
TULARE COUNTY OFFICE OF EDUCATION

Imagery ©2025 Google, Imagery ©2025 Airbus, Maxar Technologies, Map data ©2025 100 m

FIGURE 2
AERIAL PHOTOGRAPH OF PROJECT SITE
AcCEL CENTER, LIBRARY, & THEATER PROJECT
TULARE COUNTY OFFICE OF EDUCATION

Figure 3- Conceptual Site Plan

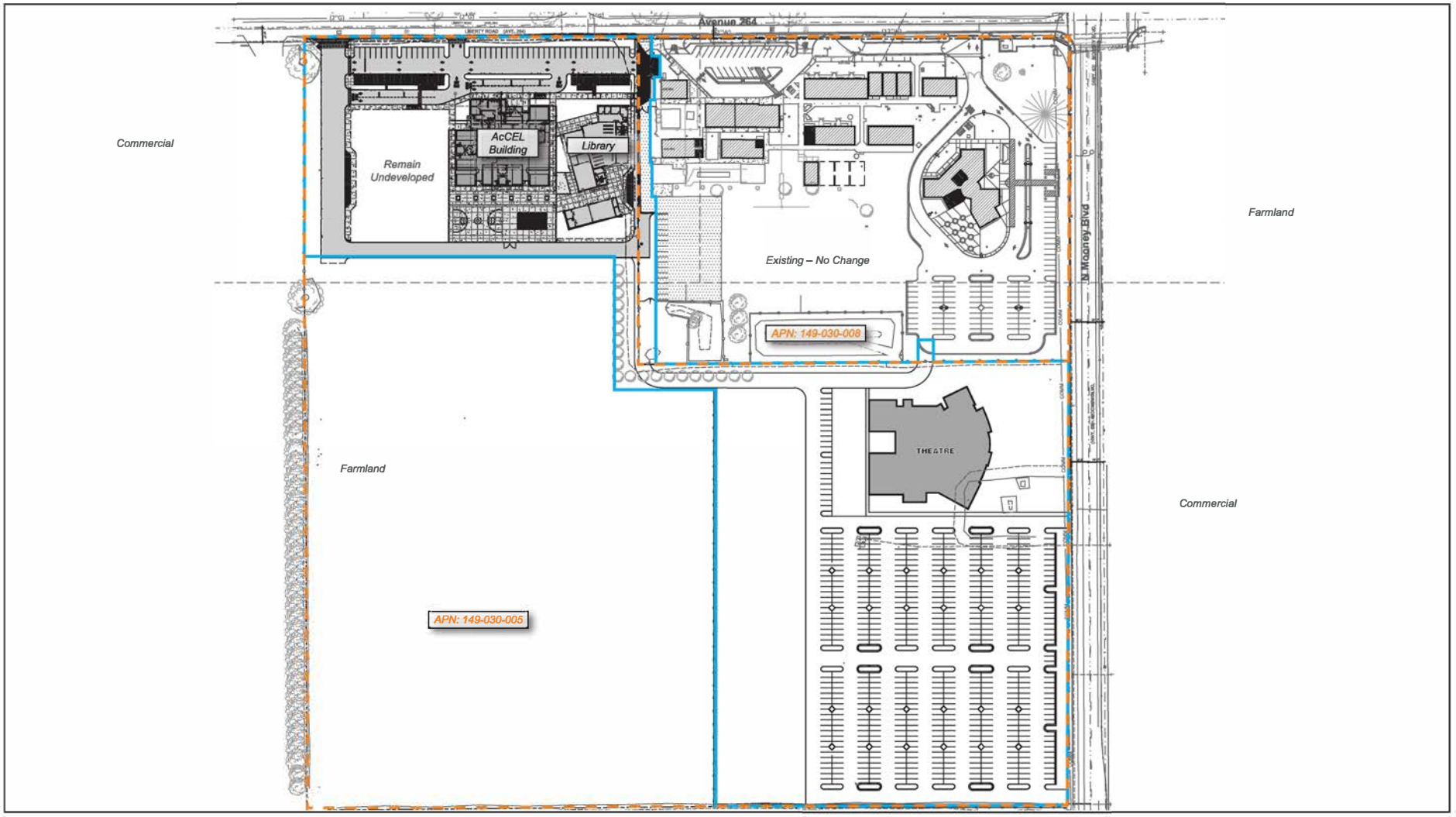

FIGURE 3
CONCEPTUAL SITE PLAN
AcCEL CENTER, LIBRARY, & THEATER
TULARE COUNTY OFFICE OF EDUCATION

II.
EXISTING TRAFFIC/TRANSPORTATION CONDITIONS

The roadway network in the vicinity of the project site (which includes sidewalks and on-street parking areas), an inventory of the types of traffic control devices and crosswalk locations, the nearby transit routes, and the existing traffic volumes are described below.

Roadway Network

The roads that provide access to the project area include Liberty Road/Avenue 264, Mooney Boulevard/State Route 63, and Harrison Road. The following paragraphs provide a brief description of the characteristics of these roadways.

Liberty Road/Avenue 264

Liberty Road/Avenue 264 is a two lane east-west roadway that abuts the north side of the project site. There are no sidewalks or bike lanes, but parking and pedestrian travel is accommodated on unpaved shoulders. The speed limit on Liberty Road/Avenue 264 is 55 miles per hour (mph), but there are signs east and west of the project site that state School – Speed Limit 25 – When Children Are Present.

Mooney Boulevard/State Route 63

Mooney Boulevard/State Route 63 is a four lane north-south roadway that abuts the east side of the project site. There are no continuous sidewalks, but there are short sidewalk segments in front of several of the developed properties. Parking and pedestrian travel is accommodated on paved and unpaved shoulders. There are no bike lanes, but bikes can use the paved shoulder where available. The speed limit on Mooney Boulevard/State Route 63 is 55 mph, but there are signs north and south of the project site that state School – Speed Limit 25 – When Children Are Present. North of Liberty Road/Avenue 264, the road is designated as S. Mooney Boulevard/State Route 63 because it extends south from the City of Visalia. South of Liberty Road/Avenue 264, the road is designated as N. Mooney Boulevard/State Route 63 because it extends north from the City of Tulare.

Harrison Road

Harrison Road is a two lane north-south roadway that intersects with Liberty Road/Avenue 264 near the northwest corner of the existing COE campus. There are no sidewalks or bike lanes, but parking and pedestrian travel is accommodated on unpaved shoulders. The speed limit on Harrison Road is 55 mph, but there is a sign on Harrison Road north of Liberty Road/Avenue 264 that states School – Speed Limit 25 – When Children Are Present for southbound traffic.

Traffic Control and Crosswalks

The existing traffic control devices and crosswalks at the study area intersections are shown in Table 1. All of the crosswalks are painted yellow to indicate that they are in a school zone. The crosswalks at the signalized intersection of Liberty Road/Avenue 264 at Mooney Boulevard/ State Route 63 are equipped with pedestrian signals and push buttons to activate the WALK signals.

TABLE 1
EXISTING TRAFFIC CONTROL DEVICES & CROSSWALKS

Intersection	*Traffic Control*	*Crosswalks*
Liberty Road/Avenue 264 at Mooney Blvd/SR 63	Traffic Signal	On All Four Legs
Liberty Road/Avenue 264 at Harrison Road	No Traffic Control	On EastLeg

Transit Service

Tulare County Regional Transit Agency (TCRTA) operates Route C40 along Mooney Boulevard/State Route 63 with bus stops located adjacent to the project site at the intersection of Mooney Boulevard/State Route 63 at Liberty Road/Avenue 264. Route C40 extends north for one-half mile to its terminus at the Tulare County Government Plaza and it extends south into the city of Tulare and locations east of the city. Transit riders can continue traveling north on S. Mooney Boulevard/State Route 63 on Visalia Transit Routes 1A and 1B.

Traffic Volumes

Manual traffic counts were taken on the study area roadways during a weekday morning peak period in May 2025. The traffic counts for this analysis were taken from 7:00 to 9:00 a.m. and the peak hour was observed to occur from 7:15 to 8:15 a.m. The morning peak hour for schools generally coincides with the peak hour for commuter traffic. Daily traffic volumes were obtained from Caltrans for Mooney Boulevard/State Route 63 and were estimated for Liberty Road/Avenue 264 by assuming that the morning peak hour was eight percent of the daily traffic volume. This eight percent factor was used because it is consistent with data obtained from the city of Tulare for locations near the project site. The existing peak hour and daily traffic volumes are shown in Table 2 for the study area roadways.

TABLE 2
EXISTING TRAFFIC VOLUMES

Street Segment	Morning Peak Hour Traffic Volume *(vehicles per hour)*	Daily Traffic Volume (vehicles per day)
Mooney Boulevard/State Route 63		
North of Liberty Road/Avenue 264	1,070	21,700
South of Liberty Road/Avenue 264	950	21,500
Liberty Road/Avenue 264		
West of Mooney Boulevard/State Route 63	340	4,250
East of Mooney Boulevard/State Route 63	220	2,750

III.
TRAFFIC IMPACT ANALYSIS

This section summarizes the analysis of the proposed project's impacts on study area traffic/transportation conditions. First is a discussion of the significance standards followed by a discussion of project generated traffic volumes and the impact on daily traffic volumes. This is followed by a discussion of the project's proposed access and circulation features. Then the findings relative to the CEQA transportation issues are presented.

Standards of Significance

With regard to the CEQA thresholds of significance, Appendix G of the CEQA Guidelines states that a project would normally have a significant effect on the environment if the project could:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), which addresses vehicle miles traveled (VMT),

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or

d) Result in inadequate emergency access.

Project Generated Traffic

The volumes of traffic that would be generated by the proposed uses were determined in order to estimate the impacts of the project on the study area roadways. Based on information provided by COE staff, a typical event at the theater would have 100 attendees and 15 employees. A typical event of this size would occur up to 45 days per year. A capacity-level event at the theater would have 500 attendees and 15 employees. A capacity-level event would occur 15 days per year. For the remainder of the weekdays throughout the year, when there would not be an event at the theater, the performing arts theater would be generally used for academic and after school uses, including performance rehearsals, special event camps, and workshops.

The volumes of traffic that would be generated by the proposed uses were determined in order to estimate the impacts of the project on traffic volumes on the study area roadways. The anticipated volumes of traffic that would be generated by the AcCEL Center and library, by the theater on a typical day, and by the theater during a capacity-level event are shown in the upper section of Table 3. As shown, the AcCEL Center and library would generate an estimated 180 vehicle trips per day (which includes 24 bus trips) based on the assumption that 75 percent of the students would be bused to and from the facility (60 students) and that each bus would transport 10 students. The theater on a typical day would generate an estimated 210 trips and a capacity-level event at the theater would generate an estimated 910 trips per day. This is based on a trip generation rate of

1.76 trips per attendee, which is the trip rate from the Institute of Transportation Engineers "Trip Generation Manual" for a theater, plus 30 vehicle trips for 15 employees.

The lower section of Table 3 shows the volumes of traffic that would be generated by each scenario. On a day with no event at the theater, the project site would generate 180 vehicle trips. On a day with a typical event at the theater, the site would generate 390 trips. On a day with a capacity-level event at the theater, the site would generate 1,090 trips.

TABLE 3
PROJECT GENERATED TRAFFIC

Facility/Scenario	*Daily Traffic (trips per day)*
GENERATED TRAFFIC VOLUMES – PER FACILITY	
AcCEL Center & Library (80 students - 75% bused, 25 staff)	180 (24 bus trips, 156 auto trips)
Performing Arts Theater – Typical Day of Event (100 attendees, 15 staff)	210
Performing Arts Theater – Capacity-Level Event (500 attendees, 15 staff)	910
GENERATED TRAFFIC VOLUMES – PER SCENARIO	
With No Event at Theater – AcCEL Center & Library Only	180 (24 bus trips, 156 auto trips)
With Typical Event at Theater – AcCEL Center, Library, & Theater Typical Day	390 (24 bus trips, 366 auto trips)
With Capacity Event at Theater – AcCEL Center, Library, & Theater at Capacity	1,190 (24 bus trips, 1166 auto trips)

Impacts on Daily Traffic Volumes

To quantify the increase in traffic volumes on each nearby roadway associated with the project, the project generated traffic shown in Table 3 was geographically distributed onto the roadway network using the following directional percentages. This distribution assumption is based on the layout of the existing roadway network and the existing traffic patterns.

DISTRIBUTION OF PROJECT GENERATED TRAFFIC

- Liberty Road/Avenue 264 west of Mooney Boulevard/State Route 63 20%
- Liberty Road/Avenue 264 east of Mooney Boulevard/State Route 63 10%
- S. Mooney Boulevard/State Route 63 north of Liberty Road/Avenue 264 35%
- N. Mooney Boulevard/State Route 63 north of Liberty Road/Avenue 264 35%

The impacts of the project on daily traffic volumes are shown in Table 4 for each study area roadway segment. The existing conditions scenario and the year 2030 scenario are shown as baseline (without project) conditions. The table shows the traffic volumes for the No Event at Theater, Typical Event at Theater, and Capacity-Level Event at Theater scenarios. The daily traffic volume on Liberty Road/Avenue 264 for the No Event at Theater scenario, for example, would

increase from 4,250 vehicles per day (vpd) for existing conditions to 4,290 vpd with the project, which is an increase of 40 vehicles per day.

TABLE 4
PROJECT IMPACT ON DAILY TRAFFIC VOLUMES

Street/Location	*Existing Without Project*	*Project Traffic*	*Existing With Project*	*2030 Without Project*	*2030 With Project*
NO EVENT AT THEATER					
Liberty Road/Avenue 264					
West of Mooney Blvd/SR 63	4,250	40	4,290	4,580	4,620
East of Mooney Blvd/SR 63	2,750	20	2,770	2,940	2,960
Mooney Blvd/State Route 63					
North of Liberty Road/Avenue 264	21,700	60	21,760	22,990	23,050
South of Liberty Road/Avenue 264	21,500	60	21,560	22,790	22,850
TYPICAL EVENT AT THEATER					
Liberty Road/Avenue 264					
West of Mooney Blvd/SR 63	4,250	80	4,330	4,580	4,660
East of Mooney Blvd/SR 63	2,750	40	2,790	2,940	2,980
Mooney Blvd/State Route 63					
North of Liberty Road/Avenue 264	21,700	140	21,840	22,990	23,130
South of Liberty Road/Avenue 264	21,500	140	21,640	22,790	22,930
CAPACITY-LEVEL EVENT AT THEATER					
Liberty Road/Avenue 264					
West of Mooney Blvd/SR 63	4,250	220	4,470	4,580	4,800
East of Mooney Blvd/SR 63	2,750	110	2,860	2,940	3,050
Mooney Blvd/State Route 63					
North of Liberty Road/Avenue 264	21,700	380	22,080	22,990	23,370
South of Liberty Road/Avenue 264	21,500	380	21,880	22,790	23,170

The year 2030 traffic volumes without the project were estimated by expanding the existing traffic volumes by 5.1 percent (one percent per year for five years compounded annually) and adding the traffic that would be generated by the planned relocation of University Prep High School to the existing COE campus on the northeast corner of the project site. Table 5 indicates that the 250-student school would generate an estimated 540 vehicle trips per day based on the trip generation rate of 2.17 trips per student from the "Trip Generation Manual."

TABLE 5
GENERATED TRAFFIC – UNIVERSITY PREP HIGH SCHOOL

Facility/Scenario	*Daily Traffic (trips per day)*
TRIP GENERATION RATES (trips per student)	
High School (trips per student)	2.17
GENERATED TRAFFIC VOLUMES	
University Prep High School (250 students)	540

Proposed Access/Circulation Features

The conceptual site plan for the proposed project indicates that the parking lot for the AcCEL Center and library, located at the northwest corner of the project site, would be accessed by two driveways on the south side of Liberty Road/Avenue 264. The parking lot will have an east-west circulation aisle with perpendicular parking spaces on each side of the aisle. The south side of the parking lot would have a student drop-off/pick-up zone and a bus loading/unloading area adjacent to the AcCEL building. Students that are dropped off and picked up at this location can access the school grounds and library without crossing the path of moving vehicles.

The parking lot for the performing arts theater, located at the southeast corner of the project site, would be accessed by two driveways on the west side of N. Mooney Boulevard/State Route 63. The parking lot will have seven north-south circulation aisles with 90-degree parking spaces on each side of the aisles. It will also have three east-west circulation aisles; one at the north end of the lot, one in the middle of the lot, and one at the south end of the lot. The north and south circulation aisles are aligned with the two driveways. The driveways could only accommodate right turns into and out of the parking lot because an existing raised median on N. Mooney Boulevard/State Route 63 prevents left turns.

The project site would have paved circulation roads that would provide the opportunity for motorists to drive in either direction between the AcCEL Center/library parking lot, the theater parking lot, and the existing parking lots at the Planetarium and Science Center and the other COE facilities. These on-site circulation roads would also accommodate emergency vehicle access.

Findings Relative to CEQA Transportation Issues

For the transportation analysis, Appendix G of the CEQA Guidelines states that a proposed project could have a significant effect on the environment if the project would:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), which addresses vehicle miles traveled (VMT),

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or

d) Result in inadequate emergency access.

The findings regarding each of these issues are presented in the following sections.

Issue: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

CEQA Finding: Less Than Significant Impact

The Transportation and Circulation Element of the Tulare County General Plan contains programmatic policies that provide a guide for a balanced, multimodal transportation network that meets the needs of all uses of County streets, roads, and highways for safe and convenient travel manner that is suitable for all users, including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors. The document includes specific goals and policies for achieving the overall strategy. The goals in the Transportation and Circulation Element that are applicable to the proposed project are as follows:

- To promote an efficient roadway and highway system for the movement of people and goods, which enhances the physical, economic, and social environment while being safe, environmentally friendly, and cost-effective.

- To support the development of a public transportation system that provides an alternative to the private automobile and meets the needs of those considered "transit dependent".

- To address the transportation system from a multimodal perspective and identify how to provide for routine accommodation of all roadway users, including motorists, pedestrians, bicyclists, people with disabilities, seniors, and users of public transportation in a manner suitable to the rural, suburban, or urban context of the general plan.

The proposed project is consistent with the goals and policies presented in the Transportation and Circulation Element as it includes an aggressive busing program for transporting students to and from the school site. The project would not adversely affect the performance of any roadway, transit, or non-motorized (pedestrian and bicycle) transportation facilities. Based on the traffic/circulation analysis and a review of the Transportation and Circulation Element of the City's General Plan, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Issue: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), which addresses vehicle miles traveled (VMT).

CEQA Finding: Less Than Significant Impact

Vehicle delays and levels of service (LOS) have historically been used as the basis for determining the significance of traffic impacts as standard practice in California Environmental Quality Act (CEQA) documents. On September 27, 2013, SB 743 was signed into law, starting a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminated auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the current CEQA Guidelines, the criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the

Guidelines, metrics related to "vehicle miles traveled" (VMT) were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. State courts ruled that under the Public Resources Code Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

SB 743 eliminates the need for some projects to be analyzed for CEQA purposes and these projects can be screened from requiring a VMT analysis. "Screened" is defined as projects that do not need to be analyzed for CEQA purposes. Tulare County's Transportation and Circulation Element has a Screening Criteria section (Section TC-7.4) that says "local-serving public facilities are presumed to have a less than significant impact on VMT. This would include government facilities intended to typically serve the local public, parks, and public elementary schools, public middle schools, and high schools. As the proposed project is a locally-serving public school, it can be screened from requiring a detailed VMT analysis. Based on these guidelines, this COE project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and would have a less than significant VMT impact.

Issue: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

CEQA Finding: Less Than Significant Impact

The proposed project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the project site would be provided by two driveways on the south side of Liberty Road/Avenue 264 and two driveways on the west side of N. Mooney Boulevard/State Route 63. There would be no roadway improvements in the public right-of-way other than the driveways and possibly sidewalks, which would be designed and constructed in accordance with the County's criteria. All improvements within the project site would be consistent with the criteria of the California Division of the State Architect.

The increased levels of traffic and the increased number of vehicular turning movements that would occur at the driveways and at the nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. These impacts would not be significant, however, because the roadways, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. These roadways and intersections have historically been accommodating educational-related traffic on a daily basis for the existing COE facilities. The proposed project would be compatible with the design and operation of an educational complex and the proposed project would not result in any major modifications to the access features at the project site other than the construction of new driveways.

As the existing roadway network could readily accommodate the anticipated increase in vehicular and pedestrian activity, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Issue: Result in inadequate emergency access.

CEQA Finding: Less Than Significant Impact

Emergency access to the project site would be provided by two new driveways on the south side of Liberty Road/Avenue 264 and two new driveways on the west side of N. Mooney Boulevard/State Route 63 in addition to four existing driveways on Liberty Road/Avenue 264. The proposed access and circulation features at the project site, including the driveways, parking lots, fire lanes, and on-site circulation roadways that provide linkage to all parking lots, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the buildings, the outdoor areas, and the parking lots. The access/circulation features at the project site are subject to and must satisfy the COE's design requirements and would be subject to approval by the Fire Department and the California Division of the State Architect. Emergency vehicles could easily access the buildings and all other areas of the campus via on-site travel corridors. The proposed project would not, therefore, result in inadequate emergency access.

IV.
SUMMARY OF IMPACTS AND CONCLUSIONS

The key findings of the traffic impact analysis are presented below.

- The proposed project would generate a net increase of 180 vehicle trips per day when there were no events at the performing arts theater, 390 trips per day when there was a typical event at the theater (45 days per year), and 1,090 trips per day when there was a capacity-level event at the theater (15 days per year).

- An analysis of traffic volumes on the roadways in the vicinity of the project site indicates that traffic generated by the proposed project would result in a relatively minor increase in traffic volumes on the study area roadways, which include Liberty Road/Avenue 264 and Mooney Boulevard/State Route 63.

- CEQA threshold of significance T-1 asks if the proposed project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The analysis indicates that there would be a **less than significant impact** because:

  - The proposed project would not adversely affect the performance or safety of any transit or non-motorized transportation facilities (pedestrians and bicycles) and would not conflict with any adopted plans, policies, or programs relative to these alternative transportation modes.

  - The Transportation and Circulation Element of the Tulare County General Plan includes specific goals and policies that provide a guide for a balanced, multimodal transportation network that meets the needs of all uses of County streets, roads, and highways for safe and convenient travel manner that is suitable for all users, including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors. The proposed project is consistent with the goals and policies presented in the Transportation and Circulation Element and would not conflict with a program, plan, ordinance, or policy of the General Plan, including transit, roadway, bicycle, and pedestrian facilities.

- CEQA threshold of significance T-2 asks if the proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), which addresses vehicle miles traveled (VMT). The analysis indicates that the VMT impact would be less than significant because the proposed project is a local-serving public facility, which includes public schools. The Tulare County guidelines state that projects in this category would have a **less than significant impact** on VMT and can be screened from any further VMT analysis.

- CEQA threshold of significance T-3 asks if the proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The analysis indicates that the roadways, intersections, and driveways are designed to accommodate the anticipated levels of vehicular

and pedestrian activity and have historically been accommodating COE-related traffic generated by the existing facilities. The proposed project would be compatible with the design and operation of the study area roadways and would not result in any major modifications to the existing access features at the project site other than the construction of new driveways and possibly sidewalks. The proposed project would not, therefore, substantially increase hazards due to a geometric design feature or incompatible uses and would have a **less than significant impact**.

- CEQA threshold of significance T-4 asks if the proposed project would result in inadequate emergency access. The proposed access and circulation features at the project site, including the driveways, parking lots, on-site circulation roads, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the site's buildings, outdoor areas, and parking lots. The proposed project would not result in inadequate emergency access and there would be a **less than significant impact**.