Section 4.11 TRANSPORTATION AND CIRCULATION Comments

Background Details

1. The Traffic Impact Study originally prepared by TGP Consulting Inc. (2009) was commissioned by the project applicant before the need for an Environmental Impact Report had been definitively established.
    - Early in the application process, processing the application with a Negative Declaration was being considered.
2. The Traffic Impact Study was completed before the scoping process took place.
    - The Planning Department had previously provided written warning to the applicant with specific instructions not to conduct their own studies prior to determination of EIR scope.
3. It is unclear whether the applicant, TPG Consulting, or the Department of Planning ever intended the document developed to become part of an EIR.
    - Consultants preparing the original applicant provided studies conducted their work under the direction of the applicant, not the county, as the lead agency.
4. URS Corporation bid to prepare an EIR was done with the knowledge that applicant provided studies existed.

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pg. 4.11-1 *The proposed rock quarry would be located on the north side of SR-58, just east of the Salinas River approximately three miles of northeast of the Santa Margarita Community.*

Comments

- As noted in Section 2.0 Project Description, the precise location of the entrance into the access road is important.
- The quarry entrance as proposed is located at Post Mile (PM) 5.08 on Hwy. 58.

pg. 4.11-2 *Table 4.11-1 lists the average daily traffic volume on the W Pozo Rd. section of the haul route at 1112[1], and the section of Hwy. 58 east of Santa Margarita as 925.[2]*

Comments

• These are the sections of Hwy. 58 where introducing the types of vehicles associated with this project proposal would create significant impacts to public health and safety.
• Currently, aside from the temporary solar construction projects, this stretch of Hwy. 58 experiences minimal traffic from the types of vehicles the proposed project would introduce.
• The ability of the geometric design of this portion of the haul route between the proposed site and Pozo Rd. to allow for the safe and orderly movement of large double gravel haulers has not been adequately addressed. Additionally, problems with the structural stability of the surface and base have also become apparent since the temporary solar projects began and are not addressed at all in this DEIR. (See comments in Section 4.7 Hazards and Hazardous Materials)
• Adding the calculated average of 273 double gravel trucks per day to the existing baseline volume of 925 amounts to an 88.54% increase in average daily traffic volume. (273 x 3 (passenger car equivalent) = 819 trips).
• Assuming the baseline remains at 925, the addition of 800 double gravel truck trips per day as anticipated for a large project, amounts to a 259.46% increase in daily traffic volume (800 x 3 (passenger car equivalent) = 2400 trips).
• If the baseline numbers and generated truck trips are accepted as accurate (because the traffic impact study is fundamentally flawed if they are not), this is a significant increase that has not been adequately addressed throughout the study.

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pg. 4.11-3 *The tractor/semi trailer/full trailer hopper trucks commonly used in the aggregate industry ("doubles") are capable of navigating the steep curvy portions of SR58 without offtracking.*

Comments

• The methodology used to arrive at this conclusion has not been adequately defined in the DEIR.
  - Provide the field data and calculations verifying this statement in technical appendices.
• A number of methods exist to accurately quantify off-tracking at any given location where the width of the road, the radius, and specific vehicle dimensions are known
  - See comments re: 90-degree curve at J Street discussed in more detail below.
• Field Observation has been employed by ATE and put forth as justification for several conclusions presented.

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[1] San Luis Obispo County 2012 (traffic counts from the Dept. of Public Works)

[2] Caltrans 2012 is the listed source of this information.

- Community members have been gathering data from "field observations" since construction began on the solar projects on the Carrizo.
- These observations provide data that illustrate an inability for double hopper gravel trucks and other large vehicles to safely navigate portions of Hwy 58. (Also see comments re: 90-degree curve at J Street discussed in more detail below.)

• There are a number of areas, even on some of the relatively straight sections, where crests and dips prevent a safe line of sight.
• Figures MP4.11-2 thru 6 provide a few examples of the many public safety concerns that have not been adequately addressed in the DEIR.
- Geometric justification must be developed at various PM locations prior to endorsement of Hwy. 58 as a suitable industrial transportation corridor.

• The impacts to public safety are potentially significant along the entire haul route.

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pg. 4.11-3 *continued* *Field observation by ATE found that there are brief periods of the day when SR 58 traffic operations are affected by school traffic on Estrada Avenue and H Street.*

Comments

• No details of what "field observation" consisted of are provided in the DEIR.
• While it's true that the school traffic is not constant, the presence of trucks intensifies the potential for conflicts and needs to be adequately addressed.
• There are times throughout the entire day that traffic associated with the school is present.
• Mitigation that eliminates this section of the road from the haul route is the only means of effectively mitigating this serious threat to public safety. (refer to Additional Mitigation Measures to 4.11)

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pg 4.11-4 *Truck traffic volumes on SR 58 in the project vicinity originate primarily from local sources (the existing rock quarries in the area, rail associated businesses and other heavy commercial centers in Santa Margarita)*

Comments

• "Vicinity" has not been defined in this context. Does vicinity typically suggest nearby?
• List "heavy commercial centers" in Santa Margarita with special attention to any that travel sections of Hwy. 58 nearby to the location of this proposal.
• There are no stops or depots on the rail corridor within Santa Margarita. List "rail associated businesses" in Santa Margarita with special attention to any that travel sections of Hwy. 58 nearby to the location of this proposal.
• Is there any current truck traffic near the proposed project site related to permanent ongoing operations (i.e. not for irregular deliveries or construction)?

SR 58 Curve on J Street
In the eastern corner of Santa Margarita, SR 58 makes a 90-degree turn from Estrada Avenue at J Street and continues towards the northeast. The addition of traffic to this segment and curve of SR 58 from the proposed Santa Margarita Ranch Agricultural Residential Cluster Subdivision was identified as a significant and not mitigated impact in the EIR for that project (San Luis Obispo County 2008, Final Environmental Impact Report for Santa Margarita Ranch 2008: ES-32, ARCS Impact T-1). The Agricultural Residential Cluster Subdivision was approved in 2008, and proposed 111 dwelling units along SR 58 southeast of Santa Margarita. ***Virtually all of that project traffic would use SR 58, and the increase of 1,154 ADT was considered a significant impact on the operation of traffic through the 90- degree curve on SR 58, in part because of the higher than average accident rate along SR 58 nearby (San Luis Obispo County 2008, Final Environmental Impact Report for Santa Margarita Ranch 2008:4.12-9). The Santa Margarita Ranch Final EIR identified mitigation measures for this impact including installing radar feedback signs and advisory speeds on each approach to the 90-degree curve on SR 58 near J Street (San Luis Obispo County, Final EIR for Santa Margarita Ranch 2008:4.12-25, and Conditions of Approval for Tract 2586, Condition 3.1. on page 13)****. The original mitigation measure also included widening both sides of SR 58 along this segment to provide four-foot shoulders and/or bike lanes in accordance with County standards; but at the time the project was approved this widening requirement along with other improvements within the Caltrans right-of-way was determined to be infeasible (San Luis Obispo County, 2008, Santa Margarita Ranch CEQA Findings: page 55).*

• No definition of infeasible as it applies to this mitigation measure has been provided.
• Who made the determination that mitigation for the benefit of public safety was infeasible?
• Is infeasible being used to pre-determine a financial evaluation for an applicant's benefit? Is it appropriate in the context of an EIR to assign consideration to the profit margin of a private business entity when defining mitigation to maintain public safety?
• Given the impact was already clearly identified within an EIR for a project now approved, if a PCE of 3.0 or greater were applied to a reasonable worst case truck count, the J Street curve must be identified as a significant impact within this DEIR.

4.11.1 pg. 5 *Level of Service for Roadways*

Comments

• LOS is not an appropriate metric as employed, and fails to address the fundamental safety concerns expressed by residents in over 200 scoping letters.
• More applicable metrics need to be applied for the conclusions to be meaningful to the specific problematic conditions of a rural route never suited to incur this level of truck traffic. The concern of residents who actually know and use the road is that SR58 was never designed or

intended to serve as an industrial transportation corridor. This seemingly obvious deficiency failed to be adequately addressed.
• The traffic impacts disclosed in the DEIR and Traffic Impact Study are understated by not using a passenger car equivalency (PCE) factor. Application of a PCE factor for project trucks significantly increases traffic and elevates the significance of the associated impacts.

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pg 4.11-17 *(Table 4.11-8) Revised Project Trip Generation*

Comments

Table A – Project Trip Generation Comparison

Land Use	Size	Daily	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
[redacted]								
Employees	495,000 TPY	10	5	0	5	0	5	5
Trucks		273	19	19	38	15	15	30
• *PCE adjustment for trucks (3.0)*		*819*	*57*	*57*	*114*	*45*	*45*	*90*
Total w/ PCE		**829**	**62**	**57**	**119**	**45**	**50**	**95**
[redacted]								
Single-Family Residential	112 DUs	**1,154**	**22**	**66**	**88**	**75**	**44**	**119**
[redacted]								
Trip Generation		**-325**	**+40**	**-9**	**+31**	**-30**	**+6**	**-24**

• As shown in Table A (submitted as part of a peer review of the TIS by Arch Beach Consulting), the actual trip count with inclusion of PCE is 829.
• This table assumes that Section 2.3.3 Trip Generation and Truck Traffic (pg.2-9) is an accurate foundation. Much of 2.3.3 relies on unsupported underlying assumptions.
• No evidence to support the applicant's "belief" that there would be no net increase in truck traffic has been provided in support of the backhauling assumption.
• No evidence to support the assertion that a 50 percent backhauling assumption would constitute a "conservative or reasonable worst case assumption" has been provided.
    • Provide comparison data from truck logs of other pavement recycling facilities in the region and elsewhere to support assumptions.
• <u>There are a number of variables that can affect the trip count arrived at in 2.3.3 of the DEIR without changing the underlying assumption values of 250 days per year and 20.2 tons of material per truck load or the stated operating hours.</u>
    1. 1500 tons of recycled material per day appears as a value in 2.3.3.
        • This figure does not appear in other locations within the DEIR.
        • This figure is not defined in the application for waiver to LUO 22.30.380.
        • What is the origin of this figure?

• Where in the project application is this figure defined?

2. The input side of the "recycling" operation has not been adequately described, but assuming we accept the 75 additional truck trips per day as a "conservative" estimate, other factors equally affect the total.

• Applicant has stated that winters will have long periods of inactivity due to market cycles associated with inclement weather. This would likely create a higher level of activity during favorable weather.

• Any combination of adjustments to the tonnage amount of broken concrete and asphalt hauled in, increasing the backhaul assumption, etc. would also increase the trip counts.

3. Additional transportation impacts created by reaching storage amount and time limits for processed and non-processed (recycled) material at peak demand times for mined material have not been addressed.

4. Further adjustment of assumption values as described and otherwise would escalate the trip count well beyond 829.

5. An increased trip count has a global effect on the entirety of this DEIR as it affects a variety of key impact areas.

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*(**pg. 2-9** Project Description) It is also possible that for specific projects,these average numbers of trips per day may be exceeded for short periods. Up to 800 truck trips per day may be anticipated for a large project.*

Comments

• This scenario would create 293% more truck trips than using the figure of 273 arrived at in 2.3.3. The cumulative level of increase in impact significance would likely be much greater than that.

• If 800 truck trips is being presented as a worst case scenario, why is an average being used for the purpose of evaluating impacts?

• Practical mitigation solutions include making the necessary improvements to the existing highway in order for it to function properly or developing an alternative haul route utilizing privately built and maintained roads.

• Associated factors being overlooked within this DEIR are impacts upon rural character all these trucks introduce and the impacts that passenger vehicles create by taking alternative routes to avoid being behind trucks. H and I Streets are obvious short-cuts that would increase traffic impacts within residential settings.

***pg. 4.11-22** SR 58 Curve on J Street:*

The issue of truck traffic from the proposed Oster/Las Pilitas Quarry, and its potential effect on the SR 58 and other roadways, was considered by reviewing agencies during the scoping period for this EIR and during preparation of the EIR itself. Although residents and others have raised a concern about the safe operation of trucks through the 90-degree curve, for several reasons the quarry related truck traffic represents a less than significant effect relative to traffic operations at this curve location. For these reasons (1-4 below), the effect of the project related truck traffic on the safe highway operations at the 90-degree curve are considered less than a significant impact:

1. The radius of curvature for the roadway at this location is adequate to accommodate large trucks within the travelled lanes, with possible use of the paved shoulder by some trucks, without "offtracking" outside of the travelled lanes (see Figure 4.11-5).

Comments

• Off-tracking is defined as the difference in the paths of the inside front wheel and of the inside rear wheel as a vehicle or combination negotiates a curve. Another commonly used definition is the difference in the paths of the centerline of the front and rear axles.
• Caltrans provides a similar definition; "off-tracking is the tendency for rear tires to follow a shorter path than the front tires when turning". Or further explained, when a tractor trailer (or any vehicle with a trailer) turns, the tires of the trailer do not follow the same course as the tires on the truck, but instead follow the turn radius of the truck (power unit).
• The "tendency" is clearly a well studied and defined geometric relationship that is possible to predict with accuracy.
    • No clear definition or calculations quantifying the extent of off-tracking at various PM locations along the currently proposed haul route have been provided in the DEIR.
    • Calculations at numerous problematic locations need to occur and be part of the EIR.

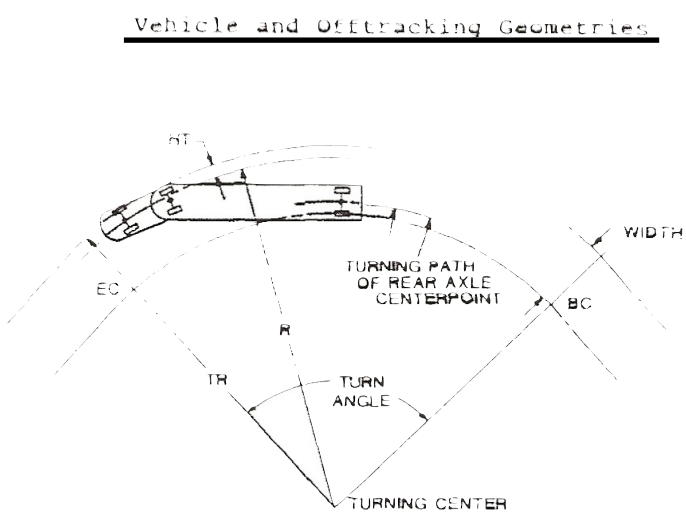

Figure MP 4.11-7

Calculations and methodology utilized to arrive at *"the radius of curvature for the roadway at this location is adequate to accommodate large trucks within the travelled lanes"* **has not been defined:**

•Without the results of some combination of off-tracking equations, development of a scale model, field observation, algorithmic computer simulation, etc., the conclusion as presented is inadequate.
• For turns of 120 degrees or less, the clean geometric relationships that exist make it possible to readily quantify off-tracking. The Western Highway Institute (WHI) off-tracking formula[3] and others provide relatively straightforward methodology.
• Applying more than one method of analysis has the most likelihood of accurately predicting reasonably foreseeable events. Of the alternatives, field observation is probably the easiest to pair with geometric equation.
• As noted, many in the community have valuable field data (video and photographs)[4] documenting an ongoing "field observation" that has been occurring daily since construction began on the solar projects on the Carrizo.
• Data gathered by residents is an essential feature of CEQA. In fact, the California Supreme Court[5] has stated that members of the public hold a "privileged position" in the process and often are able to compile much more thorough information than what limited time and local knowledge allows outside consultants.
• Although the large truck traffic volumes are far less for the solar projects[6], Figures MP4.1-10 thru 13 provide a few examples of what residents are currently experiencing at J Street.
• Figure 4.11-5 as presented provides no mathematical justification for the projected lines drawn.
    • It does serve to illustrate how out of scale and poorly designed events associated with this project proposal are within the context of a neighborhood and the rural character preferred by residents and communicated within the Santa Margarita Design Plan (refer to 4.14 Land Use).
• The treatment given to this core safety issue fails to adequately address the long term level of impacts that would be introduced by approval of this project as proposed. The community finds this unacceptable.

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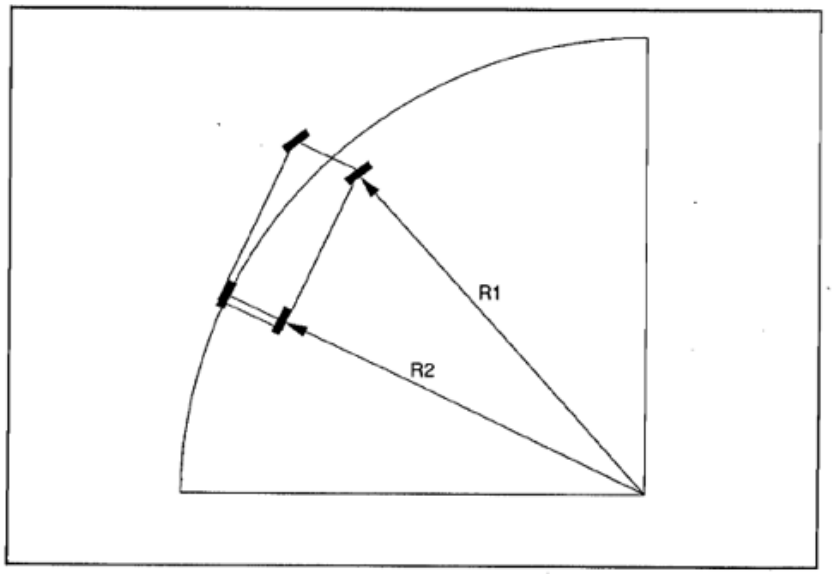
[3] Transportation Research Record N1052, Symposium for Geometric Design for Large Trucks

[4] Samples of this library are presented within these comments.

[5] Concerned Citizens of Costa Mesa v. 32nd District Agricultural Association (1986) 42Cal. 3d 929

[6] ATE prepared and provided the Traffic Management Plans (TMPs) for the solar projects currently underway. It is assumed logs exist.



Definition of Off-tracking
Figure MP 4.11- 8

Figure MP 4.11-9 PM 1.9

The geometry of off-tracking dictates the path a truck and trailer combination will follow, is predictable, and is physically pre-determined.

• Figure MP 4.11-10 thru13 clearly illustrate geometric relationships that are predictable.
  • Driving skills do not overcome geometric constraints.
• Figures MP 4.11-10 and 11 are nearly identical units driven by separate drivers (from separate trucking companies) that follow a nearly identical path of travel.
• Although 10 and 11, are the types of equipment haulers we've been seeing frequently associated with the solar projects, they appear to track very similarly to the double gravel trucks that would be generated by this proposal.
• The photos were taken over a two year period and were made possible because of the solar projects occurring on the Carrizo.
• Random study over a long period of time by individuals without financial interest in the outcome should be considered reliable and useful field observation.
• It should also be noted that the solar projects are not generating anywhere near the volume of truck traffic on the section of Hwy. 58 this project proposes to.
• What were relatively infrequent events during field observation associated with a temporary construction project would be happening every couple of minutes for the next 28-58 years.

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2. The truck traffic volume from the proposed quarry would contribute approximately 38 ***peak hour truck trips.***

<u>Comments</u>

• At an average rate of one truck every 1.57 minutes, it is reasonably foreseeable that multiple trucks will often be running end to end through the J-Street curve during peak hour and otherwise.
• Trucks passing through the curve simultaneously in opposing directions during peak hour (east and westbound) is also reasonably foreseeable during peak hour and otherwise.
• Figures MP4.11-14 thru 16 illustrate multiple gravel trucks running in succession to temporarily serve the solar construction projects.
• The far lower truck count to the solar plants and the far greater distance (elapsed time of trip cycle) further support the likelihood that this event will frequently occur at peak hour and otherwise as a direct result of this project proposal.
• Potential for accidents and fatalities not occurring at peak times has not been given adequate consideration.
• Consideration of reasonably foreseeable events is not adequately considered, nor is the weight proportionately allocated to each of these events disclosed in arriving at the conclusion that a less than significant impact to the safety of nearby residents, pedestrians, bicyclists, or the motoring public exists.

3. Truck traffic is generally slower than the passenger vehicles from residential uses.

Comments

• Slower traffic ahead increases congestion.
• Passenger vehicles will re-route through the residential neighborhoods existing on H and I Streets due to this event.
• The impacts associated with this event have not been adequately considered or analyzed.
• This impact needs to be addressed in detail in the Traffic Control Management Plan. H and I Streets will need to be declared off-limits to trucks and the measures to achieve this must be effective and enforceable.

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4. Truck drivers have an elevated driving position providing better forward vision when compared to most passenger vehicles.

Comments

• Better forward vision associated with an "elevated driving position" could be an advantage under certain circumstances.
• Introduction as further justification for the conclusion presented for the J-Street curve is oddly placed and lacks relevance.
• Evaluation within the context of the geometry of that passage would be necessary in order to begin to determine whether an elevated driving position offsets the public safety concerns being expressed.
• What values for the relationship between the proportional difference in a driver's elevation and any increase in visibility, the stopping distance of a 72' long, 80,000 lb. gravel truck relative to that of a passenger vehicle, etc. have been used?

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pg. 4.11-23 *Access, Parking, and Internal Traffic Under normal operations,* ***no more than a few trucks are expected at the quarry site at any one time. Intersection analysis indicates that under both existing and future conditions, the proposed driveway access on SR 58 will function adequately without additional highway widening, dedicated turn lanes, or other improvements****.*

Emergency service in the area is provided by Cal Fire from the Parkhill Road station, which is about 1.5 miles east of the project site. ***The proposed access drive would provide a paved road with two 12-foot travel lanes suitable for use by emergency vehicles if necessary.*** *It would not alter or interfere with access to the existing residences and ranch structures elsewhere on the property. Thus, the project effects relative to emergency access would not be significant.*

Specific construction projects or contracts may require larger volumes of aggregate material in shorter times, and these occurrences may lead to a larger number of trucks at the site simultaneously. The particular concern in this regard is the queuing or parking of trucks in nearby areas prior to the quarry opening in the mornings, or if sufficient parking is not available on-site. In addition to designated employee parking, the project design shows sufficient flat area in the vicinity of the scale house and office for parking six large aggregate trucks, without interfering with the loop road through the processing and stockpile area where trucks would be loaded. ***If trucks were also to be lined up on the paved access road, another 20 trucks could be accommodated. Thus, the issue related to off-site parking would be associated with early morning truck arrivals prior to the quarry opening. Potential disturbances to residential neighborhoods from off-site truck parking could occur if trucks arrive before the quarry opens, but it can be minimized through appropriate scheduling and operational controls at the quarry.*** *The quarry operator can identify suitable off-site parking areas, or exclusion areas where parking of heavy trucks should not occur, and provide this information to all truck drivers dealing with the quarry. Such a procedure should also include publicizing the information to the community and providing communication points to receive complaints in response to illegal truck parking.*

Comments

• No evidence to support the statement that *no more than a few trucks are expected at the quarry site at any one time* is provided.

- Observation of operations at the nearby Santa Margarita and Rocky Canyon Quarries indicate that trucks back up many more than a few at a time routinely.
- What measures will be in place to ensure that queuing of trucks would not occur in a similar manner to what is routinely observed at other local quarries?

• Early in the project, left-turn channelization (left-turn lane) was present at the entrance into the project.

- What happened to this critical safety feature?
- Was Caltrans included during preparation of the DEIR on this critical public safety feature of the project?

• Entrance Road as designed does not adequately accommodate staging (refer to the Engineered Drawings 08-23, sheets 2 & 3 of 20, Appendix B, and reproduced in Section 4.1 (Aesthetics/ Visual Resources).

- Physical constraints make it <u>not</u> possible to stage anywhere near 20 trucks along this access road.
- This is before discussion of what constitutes a reasonably foreseeable need for staging.
- The other two existing local quarries have much greater ability to stage internally within their operations, but even so, we see staging occurring wherever space exists.
- Access for emergency vehicles is at odds with fouling the inbound lane with trucks awaiting entry into the loading and scale area. (4.7 Hazards)
    - What mitigation is being proposed to address delayed emergency response in this scenario?

<u>Where exactly will trucks be staged?</u> An answer to this question must be provided in the EIR. The impacts associated with the insufficient staging currently identified need to be quantified and mitigated.

• Not identifying staging at this time in the process amounts to project segmenting and is not acceptable because it avoids the CEQA public review process.

Figure MP 4.11-17
Rocky Canyon trucks staged in a county park nearby to the quarry

Figure MP 4.11-18
Truck staged @ PM 3.2 turnout waiting for others in fleet

pg. 4.11-25 *The project is about one-half mile from the existing Hanson Santa Margarita Quarry. Both quarries are within the EX1 Extractive Resource Combining Designation, as shown on Figure 3-1. In this region, the EX1 Combining Designation is placed over the La Panza Granitics, a large area that is classified as MRZ-2 by the California State Geological Survey (1989:9). Since this Combining Designation is specifically intended to preserve mineral resources and protect mineral extraction, it is reasonable to expect that future quarries will be approved and constructed in this area.*

Comments

• The existence of the Hanson Santa Margarita Quarry comes with existing impacts that community members are aware of and that must be incorporated into all baseline data for evaluating the impacts of this proposal.
• The EX1 Extractive Resource Combining Designation is discussed in Section 4.11 as it has been in numerous other sections of this DEIR.
• Combining designations are applied in addition to other requirements within a particular land use category.[7]
• The relevance of the EX1 Extractive Resource Combining Designation to the Transportation and Circulation Section and other areas of the DEIR is not clear.
• As noted in Section 2.0 and other Comment Sections, the EX1 Combining Designation should be removed from any and all further discussions, descriptions, and related EIR materials.

• The existence of the Hanson Santa Margarita Quarry and it's current application for expansion remove the need for additional aggregate supply in this area for some time to come.
• Removing aggregate from the location being proposed by Las Pilitas Resources will only be made possible in the future by introduction of a suitable industrial transportation corridor.
• The purpose of an EIR is not to predict the future, but to evaluate the impacts of what is being proposed and measure them cumulatively with existing and approved projects.

Additions/Revisions to Mitigation Measures for 4.11

MM Traffic-1a for Impact Traffic-1a

- No methodology for determining the applicant's fair share of the cost of these improvements has been provided. No definition of a "suitable financial guarantee" has been provided.
- Have the necessary additional factors for heavy large trucks been applied?
- Has the more than 5000 times of additional road wear a gravel truck exerts been factored in?

[7] How to Use the LUE & LUO System, SLO County Department of Planning and Building pg. 2

MM Traffic-1b for Impact Traffic-1b

- This MM will need to be re-visited when the appropriate vehicle count is determined and inserted into the methodology utilized to arrive at the original conclusion.

MM Traffic-2a for Impact Traffic-2a

- This MM will need to be re-visited when the appropriate vehicle count is determined and inserted into the methodology utilized to arrive at the original conclusion.
- An applicant proposed MM of avoiding school times creates the need to evaluate the additional traffic created at other times by doing so. Also, the elementary school is only one component of the activities that take place on weekdays.
- Appropriate mitigation is an alternative haul route that does not pass the elementary school.
- If for any reason, the proposed haul route is maintained, the applicant must install a pedestrian bridge at the Elementary School Crossing.
- It is unacceptable to the community for safety to not be the over-riding consideration.

MM Traffic-2b for Impact Traffic-2b

- This MM must be funded before issuance of any use permits.
- This MM will need to be re-visited when the appropriate vehicle count is determined and inserted into the methodology utilized to arrive at the original conclusion.
- Additional features of the Margarita Design Plan should be implemented as the need for traffic slowing and calming measures increases with an accurate trip count.

MM Traffic-3a for Impact Traffic-3a

- The MM at the access shall include a left-turn lane (left-turn channelization). The impacts at this location were considered significant by Caltrans.

MM Traffic-3b for Impact Traffic-3b

- Sufficient evidence that Internal Traffic and Parking exists has not been provided. (For a detailed graphic representation of the proposed access road , refer to Section 4.1 Aesthetics and Visual Resources)
- The impacts associated with staging are significant and are not confined to only early mornings. When a project is underway, the same trucks will come and go all day as many times as the job requires. The inability of the site to safely accommodate that level of activity will be present at all times of the day. Jobs being nearby (local) magnifies the problem due to reduced length of time for trip cycles.
- MM Traffic-3b is completely inadequate on several levels even should the erroneous assumption that 20 trucks can accumulate on the access road is accepted.
- Mitigation must be effective and enforceable, therefore independent monitoring shall be required.

- The Traffic Control Management Plan must be defined and included in the DEIR. Developing it at a time after public comment period has expired is not acceptable and will not conform to CEQA guidelines.
- The Planning Dept. has no special capability in either traffic control management or validation of controls, but cannot escape it's responsibility for ensuring adequacy of the Traffic Control Management Plan program. Any TCMP shall be managed by an independent consulting firm.
- The public must also be informed of what the mitigations are and for how long they will be maintained and by whom they will be enforced.

MM Traffic-4 for Impact Traffic-4

- The applicant's "fair share" for these improvements seems drastically low for the severity of the impacts being created.
- How was the applicant's fair share determined?
- Because of the similarity of impacts, we recommend that the DEIR be revised to incorporate similar impact and MM statements as found within the EIR for the SMR Agriculture Residential Cluster Subdivision.

MM's not listed

- A maximum number of daily truck trips entering and exiting the project site.
- Alternative haul route not utilizing any portion of Hwy. 58. (Figure MP 6.0-1, Section 6.0 Comments, provides one such example)
- No jake (compression) brakes along any portion of the haul route or along project entrance/ access road.

Additional Comments - Section 4.11

1. Hwy. 58 is a popular route for bicyclists, yet the DEIR fails to address the significant impacts to the safety of cyclists that would be introduced.
2. Hwy. 58 is a popular route for motorcyclists yet the DEIR fails to address the significant impacts to the safety of motorcylists that would be introduced.
3. Hwy. 58 was never designed or intended to function as a de-facto industrial transportation corridor.
   - We cannot support the use of Hwy. 58 as a transportation corridor for this proposed operation.

4. There needs to be a left-turn lane into the project entrance traveling east as travelers come off the bridge.
   - Caltrans did not respond to the NOP, and does not appear to have offered adequate input at the administrative phase of the DEIR document.
5. There needs to be an extended exit lane out of the project entrance westbound.
6. The westbound line of sight from PM6 to PM5 needs further evaluation with verified field dimensions. From Parkhill Rd., there is a dip in the road that prolongs the inability to see oncoming traffic around the blind corner.
7. Level of Service (LOS) is not an appropriate metric capable of quantifying the impacts to public safety on a rural haul route (with a Ca. Yellow Advisory already in place) that passes a school, a park, a railroad crossing, pedestrians, and bicyclists.
8. The DEIR and Traffic Impact Study failed to adequately address potential impacts and needed mitigation measures at the at-grade railroad crossing at El Camino Real/Estrada Avenue. The EIR for the SMR Ag Cluster found significant impacts and provided appropriate mitigation.
9. No consideration has been given to the operating value of Structure 49 0237 (Salinas River Bridge). (Refer to the specifications in Section 4.7 Hazards and Hazardous Materials)

Misc. Field Observations pgs. 18 - 24

Figure MP4.11-2 Eastbound PM2.15

Figure MP4.11-3 Westbound PM 3.5

Figure MP4.11-4 Eastbound travel @ PM 4.4 (view from east side of blind

Figure MP4.11-5 Westbound travel @ PM 4.4 (view from east side of blind curve)

Figure MP4.11-6 Westbound travel @ PM 4.4
(viewed from west side of blind curve)

J Street

Figure MP 4.11-10

Figure MP 4.11-11

Westbound at J Street, the power unit is over the centerline while the trailer is all the way into the shoulder. Different day, different truck, different driver, almost identical outcome.

Figure MP 4.11-13

Figure MP4.11-14 PM3.65

Figure MP4.11-15 PM3.4

Figure MP4.11-16