

ATTACHMENT 10

EL DORADO HILLS AREA PLANNING ADVISORY COMMITTEE (JANUARY 6, 2020) RESPONSE TO COMMENTS

These comments and responses are associated with the comments involving the original Draft EIR and original Final EIR.

Comment 1

FEIR Response I-17-7

The commenter notes the traffic impacts reprinted in this comment at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection, which as the commenter correctly notes, would be significant based on the original traffic analysis. A revised traffic analysis was prepared in 2017 to include improvements that had been completed since the circulation of the Draft EIR, to be consistent with the County's 2016 Capital Improvement Program, and to recognize the opening of the new Silva Valley Parkway Interchange. The 2017 updated traffic analysis, however, indicates that the project impacts at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection would be less than significant, and no mitigation would be required.

EDHAPAC Subcommittee Finding

On its face, this seems improbable - existing conditions result in significant queuing and stacking in left turn lanes on both northbound and southbound El Dorado Hills Blvd during peak AM and PM hours. With the imminent opening of the Saratoga Way connection to Iron Point Road in Folsom, and the build out of the Saratoga Estates residential development project, it seems inconceivable that the CEDHSP project would result in less than significant impacts at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection. This finding flies in the face of reason, and of current conditions as observed by El Dorado Hills residents.

Response

The commenter is concerned about the impact of the opening of the Saratoga Way Extension (CIP #71324) project to traffic and the impact of traffic from the planned Saratoga Estates residential development project on traffic operations at the El dorado Hills Boulevard/Park Drive/Saratoga Way intersection. The following outlines the General Plan Policy that guides the preparation of transportation impact analysis in El Dorado County, summarize the findings of the analysis of the project under existing baseline conditions, and summarizes the findings of the near-term conditions analysis that address traffic operations with the opening of the Saratoga Way Extension (CIP #71324) project to traffic and the impact of traffic from the planned Saratoga Estates residential development project.

Policy TC-Xd and Policy TC-Xe of the El Dorado County General Plan Transportation and Circulation Element, July 2004 (Amended September 2018), inserted below, defines LOS for County-maintained roadways (Policy TC-Xd) and the term "worsen" for the purpose of determining project-related impacts (Policy TC-Xe).

Policy TC-Xd Level of Service (LOS) for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in the Community Regions or LOS D in the Rural Centers and Rural Regions except as specified in Table TC-2. The volume to capacity ratio of the roadway segments listed in Table TC-2 shall not exceed the ratio specified in that table. Level of Service will be as defined in the latest edition of the Highway Capacity Manual (Transportation Research Board, National Research Council) and calculated using the methodologies contained in that manual. Analysis periods shall be based on the professional judgment of the Department of Transportation which shall consider periods including, but not limited to, Weekday Average Daily Traffic (ADT), AM Peak Hour, and PM Peak hour traffic volumes.

Policy TC-Xe For the purposes of this Transportation and Circulation Element, “worsen” is defined as any of the following number of project trips using a road facility at the time of issuance of a use and occupancy permit for the development project:

- A. A 2 percent increase in traffic during the a.m. peak hour, p.m. peak hour, or daily, or
- B. The addition of 100 or more daily trips, or
- C. The addition of 10 or more trips during the a.m. peak hour or the p.m. peak hour.

Consistent with Policy TC-Xd, level of service is defined by the County in the latest edition of the *Highway Capacity Manual* (Transportation Research Board, National Research Council) and calculated using the methodologies contained in that manual. Based on the methodologies delineated in the *Highway Capacity Manual*, level of service for signalized and all-way stop controlled intersections are based on the average control delay for the entire intersection. Consequently, intersection impact analysis for signal and all-way stop control intersections are based on average control delay for the entire intersection and not individual lane groups or movements. Vehicle queueing, on its own, may not indicate unacceptable operations or a significant impact.

As documented in the revised traffic analysis, the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection operates acceptably at LOS B during the AM peak hour and LOS C during the PM peak hour. The addition of the proposed project would increase delay at the intersection and result in LOS D during the AM peak hour and LOS C during the PM peak hour. However, the intersection would continue to operate acceptably (i.e. LOS E or better) during both peak hours.

The revised analysis also includes a near-term analysis scenario to address Voter Initiative Measure E. The near-term scenario represents conditions 10 years beyond the existing baseline (i.e., 2027), including land use growth and capacity-enhancing roadway projects from the County’s 2016 Capital Improvement Program. Specifically, the near-term analysis includes Phase 1 of the Saratoga Way

Extension (CIP #71324) and development in the proposed Saratoga Estates project that are referenced in the comment.

Between the existing baseline and near-term conditions, AM and PM peak hour traffic volumes through the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection are forecast to increase by an average of about 32 percent, with about 85 percent of that increase occurring to/from Saratoga Way (i.e., due to the Saratoga Way Extension project and due to planned growth in the Saratoga Estates development). As a result, the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection will operate unacceptably at LOS F during the AM peak hour without the project. The project will worsen unacceptable LOS F conditions, since it will add more than 10 trips to the intersection during the AM and PM peak hours, which is an impact based on the definition of worsen provide in General Plan Policy TC-Xe. The addition of a separate southbound right-turn lane would mitigate the impact and result in acceptable LOS E operation during the AM peak hour.

Comment 2

FEIR Response I-22-3

The commenter is concerned about cut-through traffic at the Raley's shopping center. Cut-through traffic is not anticipated due to its inefficiency. Park Drive, which provides access to the Raley's shopping center, is a public (i.e., County) road. The Park Drive extension, which is a County CIP project, would be a 2-lane roadway built to County standards. The extension would reach the existing Park Drive, approximately 350 feet from the El Dorado Hills Boulevard intersection. Cutting through the parking lot would require stopping at six stop signs prior to the intersection of Park Drive/El Dorado Hills Blvd/US Highway 50 westbound on-ramp. This route would take longer and result in more delays to the driver than using El Dorado Hills Boulevard. Therefore, it is unlikely to attract cut-through traffic. The facility will be designed to applicable County design standards and will accommodate all travel modes and users.

EDHAPAC Subcommittee Finding

This response indicates that due to the presence of 6 (six) stop signs in the Raleys shopping center parking lot, that access to the southern Park Drive signalized intersection at El Dorado Hills Boulevard and US50, makes it unlikely to attract cut-through traffic. There is a current route through the Raleys Shopping Center Parking Lot that would limit the number of stop signs encountered to 2 (two) stop signs by traveling at the western edge of the parking lot, instead of directly along the store-fronts.

In an analytical exercise such as an FEIR, citing an example such as the 6 (six) stop signs seems common sense - however in practical, real world conditions, most commuters intrinsically know that traffic, like water, will find the path of least resistance: 6 (six) stop signs or not. If drivers feel that the shopping center parking lot, with 6 (six) stop signs [or only two], will allow them to access the El Dorado Hills Boulevard/Park Drive/US 50 intersection more quickly than using the Park Drive/Saratoga Way/El Dorado Hills Boulevard intersection, then they will opt for the parking lot cut-through.

Additionally, some questions remain regarding the internal circulation behind the Raley's Shopping Center - labeled as "Saratoga Way" on the El Dorado County Assessor's GIS Map - a remnant of the previous Saratoga Way alignment prior to the WB US50 El Dorado Hills Blvd interchange improvements. Since no specific alignment or design is suggested in the CEDHSP project documents east of the Raley's Shopping Center, it remains unclear if the existing internal circulation roadway on the east side of the property will be incorporated as part of the Park Drive modification/extension. This will provide another internal route on the east and south sides of the Raley's Shopping Center main building, with a connection to the southern Park Drive/ WB US50 El Dorado Hills Boulevard Interchange. This provides the potential for additional cut-through-traffic to travel behind the Raley's between the Park Drive extension and the southern Park Drive/ WB US50 El Dorado Hills Boulevard Interchange.

Response

The commenter is concerned about the potential for traffic from the proposed project using internal roadways in the privately owned Raley's Shopping Center.

The extension of Park Drive, which is part of County CIP Project #36105007 (Country Club Drive Extension – El Dorado Hills Boulevard to Silva Valley Parkway) will be designed according to County standards that are specified in General Plan Policy TC-1a, which is included below for reference. Since the circulation of the Second RDEIR, and in response to public comments, a circulation option that would avoid the extension of Park Drive through the Raley's shopping center area has been evaluated (Fehr & Peers 2021 (RFEIR Appendix L-7), ICF 2021). Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Silva Valley Parkway (see Exhibit H-1 of Staff Report). The alignment through the parcel would be similar, as would the width of the roadway, and there would be no roundabout or intersection. This new roadway would include an emergency vehicle access connection to Park Drive at Raley's and La Borgata shopping centers. The analysis determined that no

new worsened impacts as compared to the proposed project would result from implementation of this option.

Policy TC-1a The County shall plan and construct County-maintained roads as set forth in Table TC-1. Road design standards for County-maintained roads shall be based on the American Association of State Highway and Transportation Officials (AASHTO) standards, and supplemented by California Department of Transportation (Caltrans) design standards and by County Department of Transportation standards. County standards include typical cross sections by road classification, consistent with right-of-way widths summarized in Table TC-1.

Detailed design of the roadway extension has not been completed and is not required for specific plan approval. Detailed design will be a condition of approval placed on the project and subject to County approval prior to development in the project that would need the extension of Park Drive for access. As outlined above, the design will be required to conform to County standards and will be developed in consultation with the owners of the Raley's and La Borgata Shopping Centers. Through this consultation, elements of the design will be addressed like the connections to existing internal roadways, including the internal access roadway on the east side of the Raley's Shopping Center.

Comment 3

Intersection Impacts

EDHAPAC Subcommittee Finding

El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection

The EDHAPAC Subcommittee feels that it is incomprehensible that the project results in less than significant impacts at the El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection. With the imminent connection of Saratoga Way in El Dorado Hills to Iron Point Road and access to the City of Folsom, the EDHAPAC Subcommittee believes that the actual impacts to the intersection cannot be known. Add to that, the unknown impacts of connecting Country Club Drive from Silva Valley Parkway to Park Drive. The traffic impacts from residential communities in the Silva Valley Parkway area of El Dorado Hills to the El Dorado Hills/Saratoga Way/Park Drive intersection are unknown, as Country Club Drive is envisioned as a parallel capacity roadway along US50.

Response

The commenter is concerned about the impact of the opening of the Saratoga Way Extension (CIP #36105034) project to traffic and the impact of traffic from the planned Saratoga Estates residential development project on traffic operations at the El dorado Hills Boulevard/Park Drive/Saratoga Way intersection. Please refer to Response to Comment 1 for a summary of traffic operations at the intersection with the addition of traffic from the proposed project.

Comment 4

From the perspective of the CEDHSP, no significant study has been made as to the impact of the proposed Park Drive extension from the other three Country Club Drive extension projects in the 2018 El Dorado County CIP from Bass Lake Road to El Dorado Hills Boulevard. This segment of Park Drive on the east side of El Dorado Hills Boulevard, is currently configured as an interior parking lot circulation roadway. The suggested designs for extending Park Drive appear to be not much more than that - a narrow roadway, constrained by two existing shopping centers. From a satellite map, the approximate distance from the realigned Park Drive to the northeast corner of the Raley's Shopping center building seems to be less than 30 feet - is this adequate for a parallel capacity roadway for US50? Will a roadway this narrow, with an alignment this convoluted, meet that purpose? What are the envisioned design speeds on this parallel capacity roadway? There seems to be no provision to ever be able to expand the Park Drive extension - as a parallel capacity roadway, increased traffic counts and growth are inevitable - Park Drive between the Raley's Shopping Center and the La Borgota Shopping Center begins as an already physically constrained segment due to the proximity of existing buildings and facilities to the roadway - is this really the best solution for a parallel capacity roadway?

Additionally, from a satellite map measuring tool, the first stop sign at Park Drive inside the Raley's Shopping Center parking lot appears to be less than 60 feet away from the proposed Park Drive alignment - that only allows stacking for approximately less than three cars. Similarly, the driveway entrance to the building housing Lyons Real Estate, and Vitek Mortgage in the Raley's Shopping Center (3900 Park Drive), are less than 20 feet from Park Drive now. Will left turn movements into and out of this small separate parking lot be restricted? Will a right out-only restriction force drivers into the main Raley's Shopping Center parking lot, and then onto the southern Park Drive intersection at El Dorado Hills Boulevard? Or will it force vehicles exiting the 3900 Park Drive parking lot into the La Borgota parking lot to turn around to continue west onto Park Drive?

Response

The commenter states that no significant study has been made as to the impact of the proposed Park Drive extension from the other three Country Club Drive extension project in the 2018 El Dorado County CIP from Bass Lake Road to El Dorado Hills Boulevard.

The cumulative conditions analysis (documented in in the original Draft EIR Chapter 5, Other CEQA Consideration) includes the analysis scenario reference by the commenter. Under cumulative conditions, the following 2021 County CIP projects related to the comment are included in the analysis:

- Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway (CIP #36105007)
- Country Club Drive – Silva Valley Parkway to Tong Road (CIP #36105008)
- Country Club Drive – Tong Road to Bass Lake Road (CIP #36105009)
- Country Club Drive Realignment – Bass Lake Road to Tierra De Dios Drive (CIP #36105010)
- Saratoga Way Extension – Phase 1 (CIP #36105034)

- Saratoga Way Extension – Phase 2 (CIP #36105035)

Detailed design of the roadway extension has not been completed and is not required for specific plan approval. Detailed design will be a condition of approval placed on the project and subject to County approval prior to develop in the project that would need the extension of Park Drive for access. The design will be required to conform to County standards and will be developed in consultation with the owners of the Raley's and La Borgata Shopping Centers. Through this consultation, elements of the design will be addressed like the connections to existing internal roadways, including the internal access roadway on the east side of the Raley's Shopping Center. As noted in Response to Comment 2, the applicant has analyzed a circulation option that would avoid the extension of Park Drive through the Raley's shopping center area. Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Silva Valley Parkway (see Exhibit H-1 of Staff Report). This new roadway would include an emergency vehicle access connection to Park Drive at Raley's and La Borgata shopping centers.

It should be noted the CIP Project No. 36105007 (Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway) is not part of the CEDHSP and is not needed as mitigation for the proposed project. CIP Project No. 36105007 will require CEQA analysis as part of the project development and approval process.

Comment 5

The current El Dorado Hills Boulevard - Park Drive - intersection configuration inside the Raleys Shopping Center is also a curve on a fairly significant grade. The entire concept of providing a parallel capacity roadway to US50 through this haphazard road segment seems ill conceived, and poorly planned.

Response

The commenter identifies that Park Drive east of El Dorado Hills has horizontal and vertical curves and questions the utility of the CIP Project No. 36105007 to provide parallel capacity to US 50.

Detailed design of the Park Drive (Country Club Drive) roadway extension has not been completed and is not required for specific plan approval. Detailed design will be a condition of approval placed on the project and subject to County approval prior to develop in the project that would need the extension of Park Drive for access. The design will be required to conform to County standards and will be developed in consultation with the owners of the Raley's and La Borgata Shopping Centers. Through this consultation, elements of the design will be addressed like the connections to existing internal roadways, including the internal access roadway on the east side of the Raley's Shopping Center. The reader is referred to Response to Comment 2 regarding the Country Club Drive Extension Circulation Option that would modify the alignment of this planned roadway.

The design of the CIP Project No. 36105007, which is not part of the CEDHSP and is not needed as mitigation for the proposed project, will also be designed to County standards that are specified in General Plan Policy TC-1a (included below).

Policy TC-1a The County shall plan and construct County-maintained roads as set forth in Table TC-1. Road design standards for County-maintained roads shall be based on the American Association of State Highway and Transportation Officials (AASHTO) standards, and supplemented by California Department of Transportation (Caltrans) design standards and by County Department of Transportation standards. County standards include typical cross sections by road classification, consistent with right-of-way widths summarized in Table TC-1.

Among many other considerations, the design of the project will consider terrain (i.e., horizontal and vertical curves) and the presence of sensitive environmental and/or cultural resources. These factors will influence the roadway design including the roadway design speed. Given the location of CIP Project No. 36105007 (Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway), which is north of US 50 and parallel to US 50, it will provide parallel capacity to US 50. It will also serve to increase the redundancy of the roadway network in the El Dorado Hills community, which would reduce the dependency on existing roadway facilities, and reduce out-of-direction travel. This redundancy provides alternatives to facilities like US 50 for shorter distance trips and is not intended to replace US 50 for longer commute trips that make up most of AM and PM Peak hour traffic.

Comment 6

Pointedly, when considering the El Dorado Hills Boulevard/Saratoga Way/Park Drive intersection, traffic impact analyses from multiple projects reviewed by EDH APAC over the past several years, including Saratoga Estates, El Dorado Hills Apartments at Town Center, and

Saratoga Retail Phase II, all proposed and studied in roughly a similar time frame, generally had inconsistent details and data between them about this intersection, traffic volumes, and turn movements - the exception being the final analysis result for each of the projects of less than significant impacts, or less than significant impacts with minor mitigation. This project as well seems to provide an almost engineered finding of a less than significant impact result - it seems to offer a desired conclusion.

Response

The commenter indicates that analysis of different project in the El Dorado Hills community has resulted in different analysis findings for the same study facilities. Consistent with the El Dorado County General Plan, the project is analyzed under existing (i.e., baseline) conditions, near-term conditions (i.e., 10 years from the existing baseline), and cumulative conditions (i.e., 20 years from existing baseline conditions). As such, the analysis of each project, even for the same study facility, will be different, since data collected for the existing baseline scenario will be different (i.e., collected a different times). This data includes traffic counts that vary day-to-day, signal timings that can change in response to changing traffic conditions, or even the number of pedestrian calls at the intersection. This type of variation is expected and desired, but does not indicate an error of deficiency in the analysis.

Comment 7

The left turn movement from northbound El Dorado Hills Boulevard to westbound Saratoga Way experiences stacking and queuing issues in the current peak PM hour.

Similarly, the left turn movement from southbound El Dorado Hills Boulevard to eastbound Park Drive experiences stacking and queuing issues in current peak AM hour, as well as other times of high traffic volume on El Dorado Hills Boulevard.

This will only be exacerbated with the buildout of Saratoga Estates, and the very imminent connection of Saratoga Way to Iron Point Road in Folsom.

Response

The commenter is concerned about the impact of the opening of the Saratoga Way Extension project to traffic and the impact of traffic from the planned Saratoga Estates residential development project on traffic operations at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection. Please refer to Response to Comment 1 for a discussion of the analysis of this intersection under near-term conditions, which includes the opening of the Saratoga Way Extension project to traffic and the impact of traffic from the planned Saratoga Estates residential development project on traffic operations at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection. Since the circulation of the Second RDEIR, and in response to public comments, a circulation option that would avoid the extension of Park Drive through the Raley's shopping center area has been identified. Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Silva Valley Parkway.

Comment 8

The proximity of the Park Drive/Saratoga Way intersection at El Dorado Hills Boulevard to the US50 interchange causes concern to the EDHAPAC Subcommittee. In comparison, the current close proximity of the existing Country Club Drive/Bass Lake Road intersection to the Bass Lake Road US50 Interchange in El Dorado Hills has forced the very expensive reconstruction and realignment of Country Club Drive approximately 1700 feet to the north of its current alignment. In comparison, the Saratoga Way/Park Drive/ El Dorado Hills Boulevard intersection is approximately 975 feet north of the US50 westbound on and off ramp/southern Park Drive/El Dorado Hills Boulevard intersection. The El Dorado Hills Boulevard/US50 roadway segment carries significantly higher traffic volumes than the Bass Lake Road/US50 interchange: an order of magnitude higher - is 975 feet an adequate distance for a parallel capacity roadway to intersect at El Dorado Hills Boulevard? Additionally, The US50 eastbound on and off ramp is located within 1700 feet of the Saratoga Way/Park Drive/El Dorado Hills intersection. Even with the addition of a shared onramp/through lane, is this enough capacity for current conditions, or the cumulative impacts of this project and other projects?

The EDHAPAC Subcommittee asks: Has any consideration been made instead for configuring the Country Club Drive extension from Silva Valley Parkway to El Dorado Hills Blvd to using an alternate alignment? Perhaps abandoning the Park Drive alignment in favor of an alignment bypassing Park Drive and connecting to Serrano Parkway near the Executive Golf Course Clubhouse, thereby moving the parallel capacity roadway traffic volume to a larger capacity roadway- Serrano Parkway - and moving the traffic volume further away from the US50/El Dorado Hills Boulevard interchange.

Response

The commenter is concerned about intersection spacing along El Dorado Hills Boulevard and adequacy of the corridor to accommodate traffic with the planned Saratoga Way Extension project.

The cumulative conditions analysis (documented in the original Draft EIR Chapter 5, Other CEQA Consideration) includes the analysis of El Dorado Hills Boulevard with the following 2021 County CIP projects:

- Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway (CIP #36105007)
- Country Club Drive – Silva Valley Parkway to Tong Road (CIP #36105008)
- Country Club Drive – Tong Road to Bass Lake Road (CIP #36105009)
- Country Club Drive Realignment – Bass Lake Road to Tierra De Dios Drive (CIP #36105010)
- Saratoga Way Extension – Phase 1 (CIP #36105034)
- Saratoga Way Extension – Phase 2 (CIP #36105035)

In addition, consistent with the County’s transportation impact analysis guidelines, the analysis of the corridor was conducted using microsimulation due to the intersection spacing to account for the interaction of the closely spaced intersections. All study intersections along the El Dorado Hills Boulevard corridor (White Rock Road to Serrano Parkway) would operate acceptably (LOS E or better) with the addition of the proposed project.

Since the circulation of the Second RDEIR, and in response to public comments, the applicant has analyzed a circulation option that would avoid the extension of Park Drive through the Raley's shopping center area. Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Country Club Drive.

Comment 9

Unanalyzed intersections

EDHAPAC Subcommittee Finding

With the connection of Country Club Drive from El Dorado Hills Boulevard to Silva Valley Parkway being provided by this project, has any study been made on the traffic and circulation impacts of this project via this new Country Club Drive segment to existing Silva Valley

Parkway, the Silva Valley Parkway-US50 Interchange, or White Rock Road intersections? Did the Traffic Impact Analysis consider just the project impacts to these intersections, but not the impacts to these intersections via the proposed extension of Country Club Drive between El Dorado Hills Boulevard and Silva Valley Parkway?

Significantly, these intersections include:

Silva Valley Parkway/Serrano Parkway

Silva Valley Parkway/Entrada Drive

Silva Valley Parkway/Oak Meadow Elementary School Driveway

Silva Valley Parkway/Clarksville Crossing (north and south connections)

Silva Valley Parkway/Tong Road

Silva Valley Parkway/US50 Interchange

White Rock Road/Valley View Parkway/Vine Street

White Rock Road/Hidden River Way

White Rock Road/Keagles Lane

White Rock Road/Monte Verde Drive

White Rock Road/Post Street

Response

The commenter is inquiring about analysis of area intersections with the implementation of the CIP Project No. 36105007 (Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway).

It should be noted CIP Project No. 36105007 is not part of the CEDHSP and is not needed as mitigation for the proposed project. The separate County CIP Project will require CEQA analysis as part of the project development and approval process.

PETER B. EAKLAND DECEMBER 11, 2019 LETTER RESPONSE TO COMMENTS

These comments and responses are associated with the comments involving the original Draft EIR and original Final EIR.

Comment 1

- Including a third westbound lane to create one left turn lane, one through lane, and one right turn lane in the project description and not listed as a mitigation measure. (Important Note: Figure 2-10 in the Draft EIR shows the new lane but the lane diagram for the Near Term + Project scenario instead shows the existing layout. Possibly the new lane actually may not be included in the project? If not, the inconsistency in documents should be addressed.) The Level of Service analyses for this intersection is not detailed enough to document the lane configuration actually included as the standard Synchro HCM are not included, only the results of SimTraffic post processing.

Response

The lane configuration referenced in the comment is the lane configuration analyzed under the cumulative conditions analysis scenarios. The cumulative conditions analysis (documented in the original Draft EIR Chapter 5, Other CEQA Consideration) includes Phase 2 of the Saratoga Way Extension project and a separate project category (i.e., Traffic Signal and Intersection Operational Improvements), which is used to fund various unspecified future intersection improvement projects in response to planned growth. Phase 2 of the Saratoga Way Extension project will widen Saratoga Way from two to four-lanes from the County line to El Dorado Hills Boulevard and modify the El Dorado Hills Boulevard/Saratoga Way intersection in response to changes in travel demand that would occur with the widening of Saratoga Way. Therefore, the cumulative conditions analysis includes improvements to the El Dorado Hills Boulevard/Saratoga Way intersection that would result from widening Saratoga Way, consistent with the County CIP.

Comment 2

- A connecting link from the project to Silva Valley Parkway has been included as a future option, with the project including funding for only the section to the east boundary of its property. Completion of this link certainly will affect traffic on the Park Drive extension. No traffic modeling was done to forecast the impacts.

Response

The cumulative conditions analysis (documented in Draft EIR Chapter 5, Other CEQA Consideration) includes forecasts based on the following 2021 County CIP projects related to the comment:

- Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway (CIP #36105007)
- Country Club Drive – Silva Valley Parkway to Tong Road (CIP #36105008)
- Country Club Drive – Tong Road to Bass Lake Road (CIP #36105009)
- Country Club Drive Realignment – Bass Lake Road to Tierra De Dios Drive (CIP #36105010)

- Saratoga Way Extension – Phase 1 (CIP #36105034)
- Saratoga Way Extension – Phase 2 (CIP #36105035)

Therefore, the operations analysis includes the effect of CIP Project No. 36105007 (Country Club Drive – El Dorado Hills Boulevard to Silva Valley Parkway), including changes in traffic volumes at the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection. Since the circulation of the Second RDEIR, and in response to public comments, a circulation option that would avoid the extension of Park Drive through the Raley’s shopping center area has been identified. Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Silva Valley Parkway.

CIP Project No. 36105007 is not part of the Central EDHSP and is not needed as mitigation for the proposed project. CIP Project No. 36105007 will require CEQA analysis as part of the project development and approval process.

Comment 3

Proposed Park Drive Extension (Reference Figure 2-10 in Draft EIR)

- The proposed design presents some significant issues with only a cursory inspection. They are as follows:

- a. The first driveway on the south side of Park Drive is only 165 ft. from the intersection but currently allows for all inbound and outbound movements and includes a pedestrian crosswalk. Even now, this arrangement is problematic for safety reasons, but with the project a five-lane cross-section will be developed that will essentially preclude all movements except inbound right turns. The gap in the median needs to be closed, the right turn movement needs to be channelized to prevent outbound turns, and a connection at the east end of the buildings to the large parking lot to the south needs to be opened.
- b. A 4-way stop intersection is proposed with modifications to the approaches from each direction. The intersection will be approximately 325 ft. from the signalized intersection. Its close proximity precludes a westbound flow of traffic consistent with the green time for the approach. The problem is compounded by three crosswalks that will disrupt the flow of movements. Furthermore, as vehicles on each approach move in turn, the intersection favors low volume movements. The EIR does not reflect inefficient traffic flows during peak periods of traffic that will lead to cumulative delays for a significant amount of traffic.
- c. Thirteen right-angle parking spaces have been added on the north approach to the four-way stop intersection to replace an equal number of spaces lost with the extension of Park Drive to the boundary of the new development. Located within 25 ft. of the intersection, they present a serious safety issue for vehicles both entering and leaving the spaces and should be removed from the plan. The southbound movement likely will block one or more spaces during peak traffic periods, and all vehicles entering or leaving spaces will conflict with vehicles entering the driveway. The lost spaces can be replaced elsewhere in the commercial area or if necessary within the project near its property line.
- d. Traffic flow inefficiencies also can occur when one lane diverges into two or more lanes as the possibility of blocking a lane can exist. In this case, one lane diverges into three lanes of equal 160 ft. length. If one of the lanes exceeds its capacity, i.e. more than seven vehicles, the other two lanes will be blocked.
- e. A final inefficiency factor is the steep upgrade on the westbound approach to El Dorado Hills Blvd. It reduces the capacity of each lane by at least three percent (assumes 6% grade).

Response

The comment identifies observations regarding the Park Drive Extension and the intersection illustrated on Figure 2-10 of the original Draft EIR.

Detailed design of the roadway extension has not been completed and is not required for approval of the CEDHSP. Detailed design will be a condition of approval placed on the project and subject to County approval prior to development in the project that would need the extension of Park Drive for access. The design will be required to conform to County standards and will be developed in consultation with the owners of the Raley's and La Borgata Shopping Centers. Through this consultation, elements of the design will be addressed like the connections to existing internal roadways, parking, access accommodations, and lane configurations.

The layout and control presented in the original Draft EIR Figure 2-10 (i.e., that shows four-way stop control) is conceptual and intended to illustrate the general nature of a connection, but does not represent the preferred or final design. Draft EIR Figure 2-10 is not a detailed design of the intersection that would be needed for approval by the County for construction.

Several different traffic control options were tested at the intersection to evaluate the feasibility of the intersection relative to traffic operations. This analysis is presented in the RFEIR (refer to Response to Comment I-11-72). A key consideration in the future detailed design is queue management, in addition to satisfying the County's intersection level of service policy requirements. Management of vehicle queuing is important due to the proposed intersection's proximity to El Dorado Hills. Specifically, vehicle queuing on the eastbound approach could impact El Dorado Hills Boulevard if not managed. As shown in Response to Comment I-11-72, a three-way stop controlled intersection would provide acceptable (LOS B or better) operation and manage vehicle queues on the eastbound approach.

As previously notes, the applicant has analyzed a circulation option that would avoid the extension of Park Drive through the Raley's shopping center area. Under the Country Club Drive Extension Circulation Option, Park Drive would not be extended and instead the north-south roadway from Serrano Parkway would curve to the east and extend to Silva Valley Parkway.

Comment 4

- The east approach serves Saratoga Way. As with the Park Drive road, a single lane widens into three lanes beginning approximately 220 ft. from the intersection. At that point, a second lane is added that then diverges into two lanes at 150 ft. from the intersection. Any lane backing up to 200 ft. (eight vehicles) will prevent vehicles from continuing to enter either of the other two lanes.
- South of the intersection, El Dorado Hills Blvd. has three lanes but is only fed by two southbound through lanes approaching Saratoga Way. A channelized westbound right turn lane into the added lane could be created. This minor improvement is not critical but would slightly reduce overall intersection delay.

Response

The commenter offers several observations of the eastbound approach to the El Dorado Hills Boulevard/Park Drive/Saratoga Way intersection, including the transitions of lanes from one approach lane to three turn lanes at the intersection. In addition, the commenter recommends the addition of a channelized eastbound right-turn lane to reduce delay at the intersection.

SimTraffic micro-simulation was used to analyze traffic operations on El Dorado Hills Boulevard and Latrobe Road to accurately analyze the effect of closely-spaced intersections that are characteristic of complex transportation systems under congested conditions, which can occur on the Latrobe Road/El Dorado Hills Boulevard corridor under existing conditions. The Federal Highway Administration *Traffic Analysis Toolbox*, (June 2004), offers the following guidance regarding the strengths and limitations of HCM analysis models.

6.0 Comparison of *Highway Capacity Manual (HCM)* and Simulation

The intent of this section is to compare the capabilities of HCM and traffic simulation tools and to provide additional guidance on assessing when traffic simulation may be more appropriate than HCM-based methods or tools.

6.1 HCM Strengths and Limitations

For many applications, HCM is the most widely used and accepted traffic analysis technique in the United States. The HCM procedures are good for analyzing the performance of isolated facilities with relatively moderate congestion problems. These procedures are quick and reliable for predicting whether a facility will be operating above or below capacity, and they have been well tested through significant field-validation efforts. However, the HCM procedures are generally limited in their ability to evaluate system effects.

Most of the HCM methods and models assume that the operation of one intersection or road segment is not adversely affected by conditions on the adjacent roadway. Long queues at one location that interfere with another location would violate this assumption. The HCM procedures are of limited value in analyzing queues and the effects of the queues.

The SimTraffic micro-simulation analysis applied the following best-practice methodology:

- The simulation was conducted for the entire peak hour (i.e., 60 minutes) using four 15-minute intervals with the peak hour factor applied in the second interval
- The results were based on the average of ten model runs using random seeding
- Each of the ten simulation runs applied a ten-minute seeding time

The existing conditions SimTraffic model was validated to field measured traffic volumes and observed maximum vehicle queue lengths.

Simulation also accounts for the operational characteristics identified by the commenter, including the length of lane transitions, since the methodology models individual vehicles traveling through the analysis network. Therefore, the operations analysis results (level of service and delay) include the effects of these types of geometric conditions.

Comment 5

- Attached are level of service results for the El Dorado Hills Blvd/Saratoga Way-Park Drive intersection as prepared for the 2017 Measure E analysis. It includes a summary of SimTraffic Post-Processor analyses and does not include lane configurations and signal timing data that are routinely provided for straight-forward Highway Capacity Manual (HCM) analyses conducted for most other intersections.

Response

The transportation analysis, including the SimTraffic micro-simulation, input assumptions were independently reviewed by the El Dorado County Department of Transportation. The transportation analysis methodologies and input assumptions for the Measure E analysis are documented in Chapter

3.14 of the original Draft EIR. Lane configuration for the Measure E analysis are shown on Figures 1, 2A, and 2B of the Memorandum – Central El Dorado Hills Specific Plan Measure E Analysis (June 22, 2017).

Comment 6

In both AM and PM peak hours, the green time allocations are well-balanced with the percentages of traffic demand for each movement in a narrow range between approximately 97% and 102%. In real practice, such a narrow range is rarely achieved if pedestrian crossings are considered, which certainly leads to a longer cycle time than has been selected.

Response

The commenter incorrectly associates served volume with the allocation of the traffic signal cycle length to individual turn movements. Specifically, the commenter references green time, which is the share of the traffic signal cycle length allocated to each turn movement when vehicles are allowed to travel through the intersection (i.e., with a green signal indication). Served volume is the number of vehicles that travel through an analysis intersection during the analysis period, relative to the demand for travel through the intersection. In addition, based on the incorrect understanding of served volume, the commenter insinuates that the analysis did not include pedestrian activity, which is not correct. The transportation analysis methodologies and input assumptions for the Measure E analysis are documented in Section 3.14 of Volume 1 of the RFEIR. Counted pedestrian and bicycle volumes were used in the analysis with a minimum of two pedestrians per approach per peak hour.

Comment 7

If the HCM analyses had been utilized for this intersection with consideration of pedestrian crossings, almost certainly LOS F would have resulted. Without providing justification for its use or even operational assumptions, the analysis obscures the absence of flexibility in addressing future conditions beyond 2025.

Response

Please refer to Responses to Comments 4, 5, and 6. Consistent with Federal Highway Administration guidance, HCM analysis models were not applied due to congested conditions that can occur on the Latrobe Road/El Dorado Hills Boulevard corridor under existing conditions, which is characterized by vehicle queue spillback that impacts operations at downstream intersections. Response to Comment 4 describes the Federal Highway Administration *Traffic Analysis Toolbox*, (June 2004) guidance regarding the strengths and limitations of HCM analysis models.

Since HCM analysis models are of limited use in analyzing system effects, like analyzing queues and the effects of vehicle queues that affect operations at adjacent intersections, application of HCM analysis models would be inappropriate for the conditions that exist in the study corridor and would result in inaccurate results, since the impact of vehicle queues on the system of traffic signals would not be included in the analysis results.

Comment 8

- The attached results for the Measure E traffic analysis state that the traffic signal with minor mitigations can operate at LOS E in the AM peak hour and D in the PM peak hour, but there are major warning signs. In the AM peak period, the approach with the largest traffic demand operates at LOS F, with the left turn lane only accommodating 98.9% of demand. For the PM peak period, each approach has at least one movement operating at LOS F, and both the eastbound and westbound approaches operate at LOS E. Although the analysis results technically meet EIR LOS thresholds, it actually shows that concerns already exist and likely will experience cycle failures with moderate additions of traffic on even one of the approaches. As the intersection has crosswalks on the southbound, eastbound, and westbound approaches, cycle failures are likely to occur frequently with appropriate signal controller settings for 2025 with project conditions.

Response 8

Please refer to response to Comments 4 through 7. The commenter correctly identifies that the southbound left-turn has a served volume of 98.9 percent. Demand for this movement is 110 vehicle per hour. Therefore, a served volume of 98.9 percent means that one of the 110 vehicles was not able to travel completely through the intersection during the peak hour. This outcome is reasonable as delay increases and queues develop, and is precisely why micro-simulation was used for analysis of the study corridor. The commenter also correctly identifies that the analysis results meet the County LOS thresholds for acceptable operations.