

COUNTY OF EL DORADO DEPARTMENT OF TRANSPORTATION

INTEROFFICE MEMORANDUM

Date:July 7, 2020To:Board of SupervisorsFrom:Natalie K. Porter, P.E., T.E.
Senior Traffic EngineerSubject:Dollar General Traffic Supplemental Discussion

BACKGROUND

On May 28, 2020, the Planning Commission heard and approved the Design Review Permit for the Cool General Retail project ("Dollar General" or "Project"). Subsequent to the meeting, questions arose from Planning Commissioners regarding the traffic data contained in the *Traffic Impact Analysis for Cool Dollar General Store*, dated March 9, 2020, ("Traffic Study") and analysis of the General Plan TC-x policies.

On May 27, 2020, the day before the Planning Commission hearing for the Project, Planning staff was made aware that the July 2019 version of the Traffic Study was inadvertently uploaded to Legistar and circulated with the Initial Study/Mitigated Negative Declaration ("IS/MND"), instead of the more recent March 2020 version. The IS/MND was updated to include the March 2020 version. The updated March 2020 version of the Traffic Study was uploaded to Legistar at approximately 8:39 a.m. on May 28, 2020, which was before the hearing on the Design Review Permit had commenced, but after the Planning Commission meeting had begun. Given this timing, the updated version was discussed at the Planning Commission hearing and staff recommended that the Planning Commission "[i]nclude revised Exhibit K and Appendix G as provided in Staff Memo dated 05/28/2020." This action was ultimately included in the motion and action approved by the Planning Commission.

Given the timing, however, the Planning Commissioners were not able to review the updated March 2020 version of the Traffic Analysis in advance of hearing the item. This memorandum thus provides an overview of the additions to the March 2020 Traffic Study, responds to questions and public comment received after the Planning Commission hearing, and provides further explanation of the Department of Transportation conclusions and recommendations regarding traffic for the Project.

The primary differences between the July 2019 version of the Traffic Study and the March 2020 version are:

- (1) Addition of analysis of the level of service of roadway segments for the Project.
- (2) Addition of analysis of the intersection peak hour queues for the Project.
- (3) Addition of the anticipated truck delivery route for the Project.

Staff discovered that the July 2019 version had been inadvertently uploaded and circulated based on the addition of the third item in the March 2020 version (i.e., the anticipated truck delivery route). More specifically, at 10:30 p.m. on May 26, 2020, the County received a public comment that the intersection of SR 49 and Northside Drive is insufficient to accommodate the turning radius of larger delivery trucks when those trucks would turn eastbound on SR 49. Under the March 2020 Traffic Study, it was clear that the truck delivery route identified on page 149 of attachment 13, titled "Delivery Truck Route – Cool Dollar General" included two areas of "truck route avoidance" (M- Staff Memo 05-28-20 (Revised Exhibit K and Appendix G) PC 05-52-20) that prevented trucks from attempting to make this turning movement. At the hearing, the applicant also discussed the truck turn exhibit (see Exhibit A, attached), which confirmed the adequacy of the turning movements for all delivery trucks provided that the turning movements were consistent with the truck delivery route.

In preparing to identify this exhibit to respond to the public comment at the Planning Commission hearing, the applicant discovered that the July 2019 version had inadvertently been uploaded and circulated because the July 2019 version does not have a similar restriction for the truck delivery routes. By the time staff was notified of this error on Wednesday, May 27, 2020, staff with capabilities of uploading to Legistar were no longer available to upload the document that evening.

It is also worth noting that this restriction in turning movements was discussed at the Planning Commission and added as a condition of approval at the Planning Commission hearing. Specifically, Condition of Approval 14 was amended at the hearing to include, in relevant part: "Delivery trucks for the project shall only access the property via right-in turns from SR 49 to Northside Drive and exit the property via left-out turns from Northside Drive to SR 49." The applicant also showed the analysis at the hearing confirming that, with the restricted movements, the intersection could handle any size delivery truck. This exhibit is attached to this memorandum as Exhibit A.

Lastly, as the IS/MND states, information on Level of Service (LOS) was included in the IS/MND "for informational purpose only." Pursuant to Public Resources Code section 21099(b)(2) of the California Environmental Quality Act ("CEQA"), "level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division." Thus, the discussion of LOS in the IS/MND, Traffic Study, and this memorandum are intended to address the General Plan LOS policies that remain in place independent of the CEQA.

General Plan Findings

Attachment B – Findings PC 05-28-20 detail the Planning staff findings for Design Review DR19-0006/Cool General Retail. The document lists the General Plan policies that are applicable to the Project and the specific findings for the Project in relation to the policies.

As detailed below, TC-X policies were not included in the Findings as they were either not applicable or they were addressed in the Department of Transportation approved Traffic Study. The Department of Transportation analysis for the TC-X policies was as follows:

Policy TC-Xa:

(1). "Traffic from <u>residential</u> development projects of five or more units or parcels of land shall not result in, or worsen, Level of Service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county." (<u>emphasis</u> added). This policy applies to residential development and the Project is not a residential development, therefore it is not applicable to the discussion.

(2). "The County shall not add any additional segments of U.S. Highway 50, or any other highways and roads, to the County's list of roads from the original Table TC-2 of the 2004 General Plan that are allowed to operate at Level of Service F without first getting the voter's approval."

This is not applicable as the Project is not requesting any modifications to Table TC-2.

(3) and (4). Intentionally blank as noted in the General Plan.

(5). "The County shall not create an Infrastructure Financing District unless allowed by a $2/3^{rd}s$ majority vote of the people within that district."

This is not applicable as the Project is not requesting the County create an Infrastructure Financing District.

(6). Intentionally blank as noted in the General Plan.

(7). "Before giving approval of any kind to a <u>residential</u> development project of five or more units or parcels of land, the County shall make a finding that the project complies with the policies above. If this finding cannot be made, then the County shall not approve the project in order to protect the public's health and safety as provided by state law to assure that safe and adequate roads and highways are in place as such development occurs." (<u>emphasis</u> added).

This policy applies to residential development and the Project is not a residential development, therefore it is not applicable to the discussion.

Policy TC-Xb: Not applicable as this policy refers to the County preparing a Capital Improvement Program (CIP), preparing a Traffic Impact Mitigation (TIM) Fee Program, and monitoring traffic volumes.

Policy TC-Xc: Not applicable as this policy directs how the County will pay for building the necessary road capacity.

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 judgement 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."

The Project is in a Rural Center and thus the applicable LOS under TC-Xd is LOS D for all intersections and road segments except for road segments specified in Table TC-2 are allowed to operate at LOS F.

The applicant, WoodCrest Companies, hired KD Anderson & Associates, Inc., a transportation consultant, to collect traffic data and prepare a Traffic Study for the Project. The traffic analysis was completed with guidance provided by El Dorado County Transportation staff, DKS Associates (the County's peer review consultant), and Caltrans. Kenneth D. Anderson, P.E. of the KD Anderson & Associates, Inc. firm that prepared the Traffic Study provided the following clarification: "The March 2020 traffic study addressed LOS on the segments of SR 49 north and south of SR 193 as well as on SR 193 east of SR 49 based on the measures in the Highway Capacity Manual (i.e., travel speed and the percent time following other vehicles). The current conditions are LOS D in the p.m. peak hour, with the exception of northbound traffic on SR 49 north of SR 193 towards Auburn that operates at LOS E. Those Level of Service are not changed as a result of the Dollar General project's traffic. Under the cumulative scenario LOS D conditions continue, except that SR 49 north of SR 193 operates at LOS E in both directions in the p.m. peak hour. Again, the Dollar General project does not change the Level of Service. In both cases, the amount of traffic added on each segment by the Dollar General Store project falls below the 10 vehicles per hour significance criteria identified under El Dorado County traffic study guidelines, and the project's impact under those guidelines would not be significant."

The road segment of SR 49 north of SR 193 is identified in the Traffic Study as operating at LOS E for southbound traffic in the p.m. peak hour under existing conditions without the Project (see Table 5, on page 11 of the Traffic Study). The segment will continue to operate at LOS E under existing conditions with the Project (see Table 10, on page 19 of the Traffic Study). Under 2040 cumulative conditions, the segment will operate at LOS E for both directions with and without the Project. This segment of SR 49 is included in Table TC-2 of the El Dorado County General Plan as a road segment that is allowed to operate at Level of Service F:

Road Segment(s)		Max. V/C ²
Cambridge Road	Country Club Drive to Oxford Road	1.07
Cameron Park Drive	Robin Lane to Coach Lane	1.11
Missouri Flat Road	U.S. Highway 50 to Mother Lode Drive	1.12
	Mother Lode Drive to China Garden Road	1.20
Pleasant Valley Road	El Dorado Road to State Route 49	1.28
U.S. Highway 50	Canal Street to junction of State Route 49 (Spring Street)	1.25
	Junction of State Route 49 (Spring Street) to Coloma Street	1.59
	Coloma Street to Bedford Avenue	1.61
	Bedford Avenue to beginning of freeway	1.73
	Beginning of freeway to Washington overhead	1.16
	Ice House Road to Echo Lake	1.16
State Route 49	Pacific/Sacramento Street to new four-lane section	1.31
	U.S. Highway 50 to State Route 193	1.32
	State Route 193 to county line	1.51

The Traffic Study was reviewed and approved by the County. The results of the analysis show the Project complies with the requirements of this policy.

The v/c ratio for the SR 49 segment north of SR 193 was calculated for the traffic study. The technical appendices contain the following calculated v/c ratios for the segment of SR 49 north of SR 193:

Existing conditions with and without the project:

Northbound PM Peak = 0.22

Southbound PM Peak = 0.39

2040 conditions with and without the project:

Northbound PM Peak = 0.31

Southbound PM Peak = 0.49

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."

The approved Traffic Study analyzed intersections and road segments that serve 10 or more project trips. The 10 or more peak hour trips criteria is the criteria used to analyze LOS. The

HCM analysis for LOS is based on peak hour volumes, not daily volumes. The analysis did not identify any transportation impacts directly related to the Project.

General Plan Policy TC-XeC is the criteria used in the transportation analysis to determine an impact. The 10 or more peak hour trips is triggered first, of the three, and is the data directly used to analyze LOS. General Plan Policy TC-Xd states that the LOS will be as defined in the latest edition of the Highway Capacity Manual, which is currently the 6th edition. The Traffic Study cites the 6th edition as the LOS analysis techniques used to calculate LOS (see page 5 of the Traffic Impact Analysis for Cool Dollar General Store). Transportation and Circulation consistency requirements are related to LOS. As required by the General Plan, LOS is determined by a <u>peak hour</u> analysis – in this instance the P.M. peak hour as dictated by Caltrans and concurred with by County Transportation staff. Prevailing best practices to determine the appropriate number of lanes for a roadway is to use peak hour volumes and LOS calculations as roadways are designed to accommodate the peak hour. The analysis to determine LOS is performed using peak hour volumes; the analysis of peak hour would also cover the other two criteria.

The math is presented here to illustrate the analysis process. The main road network studied for this Project is Caltrans facilities and is not under the jurisdiction of the County. Caltrans publishes traffic counts for State Routes. The annual average daily traffic (AADT) for State Route 49 near State Route 193 in Cool is 8,800. The counts collected by the consultant indicate that during the p.m. peak hour there were 866 cars going through the intersection of SR 49 and Northside Drive.

Criteria A – is a two percent increase in traffic during the a.m. peak hour, p.m. peak hour or daily. Table 6 on page 14 of the Traffic Study indicates total new trips during the a.m. peak hour to be 19 trips, the p.m. peak hour to be 42 trips, and 382 daily trips.

Two percent of 866 are 17 trips. LOS is determined using peak hour volumes. The Project is expected to generate 42 new p.m. peak hour trips. After the distribution, the larger number was analyzed for the road segments and intersections to determine potential impacts.

Criteria B – the addition of 100 or more daily trips. As is noted in Table 6 of the Traffic Study, the project is expected to generate 382 new daily trips. As 382 is larger than 100, the threshold is met to perform an analysis. LOS is determined using peak hour volumes. A conservative assumption is 10% of daily trips are in the p.m. peak hour, the 382 daily trips would be the equivalent of 38 p.m. peak hour trips. The Traffic Study analyzed 42 p.m. peak hour trips. The larger number was used to determine potential impacts.

The Traffic Study clearly shows that more than 10 project generated trips pass through intersections south of the Project. Ten trips are the criteria to perform an analysis at subject intersections. Based on the trip distribution of new trips (see Table 7 in the Traffic Study), 10% of new project trips will use the segment of SR 49 north of Northside Drive. This equates to four new project trips (42 new trips x 0.10 = 4.2 which is rounded to 4). Two trips are identified as turning into intersection #3 and two accessing intersection #3, with the remaining 34 trips

shown passing through the intersections of SR 49/SR 193. As shown in the Traffic Study, an analysis, consistent with General Plan Policy TC-Xd, was completed for the intersections and no significant impact was identified. Consistency with the LOS requirements in TC-Xd is determined using peak hour volumes not daily volumes.

Policy TC-Xf, second paragraph: "For all other discretionary projects that worsen (defined as a project that triggers Policy TC-Xe [A] or [B] or [C]) traffic on the County road system, the County shall do one of the following: (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element; or (2) ensure the construction of the necessary road improvements are included in the County's 20-year CIP."

As shown above, all three minimum criteria are met that requires an analysis of LOS for intersections and road segments in the vicinity of the Project. The analysis was performed using the HCM methodology, as required by the County's General Plan, using peak hour data. However, even if the Project "worsened" traffic by meeting one or more criteria under TC-Xe, TC-Xf requires the construction of improvements or inclusion of the necessary road improvements in the 20-year CIP only if the Project, including cumulative conditions, result in an unacceptable LOS. TC-Xf is limited to projects that are necessary to maintain the LOS established by the General Plan. Here, the Project does not change the LOS for any of the intersections or roadway segments and all intersections and roadway segments will remain at the LOS allowed in the General Plan with the Project. The Traffic Study did not identify any instance where the Project worsens the LOS to be inconsistent with the General Plan Policy TC-Xd.

The first paragraph of TC-Xf anticipates a near-term (10-year) analysis only for residential projects. The policy does not contain a 10-year analysis requirement for all other discretionary projects. A 10-year near term analysis was done for the Chik-fil-A that was proposed off of Saratoga Way in El Dorado Hills. It was deemed prudent to perform this analysis as Saratoga Way would shortly become a new connection to the City of Folsom. That is not the case for the Dollar General store – no new roadway connections are proposed in or around the Project that would redistribute traffic. Department of Transportation thus concluded that, consistent with the TC-Xf, a near-term (10-year) analysis was not appropriate for this Project.

Policy TC-Xg: "Each development project shall dedicate right-of-way, design and construct or fund any improvements necessary to mitigate the effects of traffic from the project. The County shall require an analysis of impacts of traffic from the development project, including impacts from truck traffic, and require dedication of needed right-of-way and construction of road facilities as a condition of the development. This policy shall remain in effect indefinitely unless amended by voters."

This policy is not applicable as no transportation impacts were identified in the approved Traffic Study.

Policy TC-Xh: The Project will be required to pay TIM Fees.

Policy TC-Xi: Not applicable as this policy is direction to County agencies.

Additional Traffic Analysis Beyond the TC-X Policies

95th Percentile Queues in Table 12

The March 2020 Traffic Study included analysis of gueues. The 95th percentile gueue measurement is the length in feet of the queue length that are exceeded 5% of the time. As indicated in Tables 9 and 12, the storage length for the southbound left turn lane at SR 49/SR 193 intersection has 200' of dedicated storage for the left turn. Under existing conditions, the southbound left turn lane at SR 49/SR 193 may see an increase in the queue of 10' due to the addition of the project. As stated in the discussion on 95th percentile queues on page 17 of the traffic study, the additional 10' is accommodated in the current storage length. Table 9 incorrectly states that it does not. KD Anderson pointed out the error in an email (see Exhibit B, attached). In 2040 without the Project, the needed storage for 5% of the time is 300'. If you add the Project an additional 20' is needed 5% of the time. North of the intersection, a twoway left turn pocket is striped with a 65' transition area between the left-turn pocket and the two-way left turn pocket. These could act as the default storage for the additional 100' that is needed without the Project or 120' with the Project. The additional 120' does not block the commercial driveway, identified as intersection #3 in the traffic study. SR 49 is a Caltrans facility; it would be their determination if they would require restriping to accommodate the extra dedicated left turn storage in the 2040.

Traffic Signal Warrant for the Intersection of SR 49/SR 193

As stated in the July 2019 and March 2020 traffic studies, the intersection of SR 49/SR 193 meets a peak hour "warrant" criterion for a signal. A warrant is a set of criteria that can be used to define the relative need for, and appropriateness of, a particular traffic control device (e.g., STOP or YIELD sign, traffic signal, etc.). Warrants are usually expressed in the form of a numerical requirement such as the volume of vehicular or pedestrian traffic.

Warrants should be viewed as guidelines, not as a final determination. The warrant analysis process is just one of the tools to be used in determining if a traffic signal is necessary. The California Manual of Uniform Traffic Control Devices (CA MUTCD) states, "Satisfaction of one or more warrants does not in itself require the installation of a traffic signal" and "an engineering study of traffic conditions, pedestrian characteristics, and physical characteristics of the location shall be performed to determine whether installation of a traffic control signal is justified at a particular location." However, a traffic signal should not be installed if it does not satisfy any of the warrants.

The Traffic Study indicates that the intersection of SR 49/SR 193 meets the peak hour warrant for a signal under existing conditions with the project. However, the intersection of SR 49/SR 193 operates at LOS C under existing conditions without the Project and continues to operate at LOS C with the addition of the Project. There is not a LOS deficiency at the intersection that demonstrates a need for a signal to improve the LOS. As indicated in the Traffic Study, the Project does not cause an impact to the LOS at the intersection. Table 8 of the Traffic Study (page 18) shows that the LOS of the intersection remains at LOS C with the Project and the Project adds only an additional 1.1 second delay to the intersection. Moreover, the Project only adds 34 trips to the intersection.

Nor is there an identified safety deficiency that would necessitate a signal installation at this location. See Collision History discussion in the traffic study on page 13. The statewide collision rate for rural three-lane roads (i.e., with a two-way left turn lane) is 0.94 per Million Vehicle Miles (MVM). Over the three years of data collected for the study, the rate for the SR 49 segment is 0.42 per MVM.

Based on the data, Transportation would not recommend the addition of a signal if this intersection was a County facility. Ultimately, however, this is a Caltrans intersection and the determination of improvements to the intersection must come from Caltrans. Because there is no current plan for an intersection improvement, there would be no means by which to calculate the Project's fair share toward any such improvement, which would be based on the Project's addition of 34 trips to that intersection.

Truck turning analysis

A truck turning analysis was completed and was presented at the Planning Commission meeting and is attached hereto as Exhibit A. The attached drawing used the turning radius for a WB-67 AASHTO 2011 size truck. This truck is significantly larger than any standard delivery truck that Dollar General anticipates using at this location.

Drainage

Caltrans commented, "The addition of Type E Dike along SR 49 will change the existing drainage patterns." This comment was based on a prior version of the project, when it was anticipated that a Class IV bike lane would be constructed along the project frontage. In accordance with the County's Active Transportation Plan, the project is conditioned to construct a Class II bike lane, which may or may not include Type E Dike. Should a Type E Dike be built, it will be designed and constructed to all applicable standards, thus will be engineered not to have a significant effect on existing drainage.

A Type E Dike is an asphalt concrete curb used to control drainage on highway projects. It is 1'-4" from front to back, 4" high and the face is battered at 4:1 so it is considered "Mountable," that is, it is easy to drive over. It is included on the California State Department of Transportation (Caltrans) Standard Plan A87B.

The project hydrology report analyzed the impact of the project on increased runoff, and a detention pond is proposed to prevent additional peak flows and runoff volumes from entering SR 49 roadway downstream. The bike lane consists of re-grading and paving the existing shoulder areas adjacent to SR 49. Any bike path construction will occur under the authority of the Caltrans and will be reviewed and constructed under an encroachment agreement with Caltrans. Applicable sections of the Caltrans Highway Design Manual will be followed, specifically, Chapters 800 – 890 that address Hydrology and Hydraulics. It is common practice

to provide design studies and calculations that satisfy these concerns during the design and construction phases of a project.

Generally, it is very difficult to truly change drainage patterns because water flows downhill. After review of this project, it is the opinion of the Department of Transportation that drainage associated with this improvement will be easily addressed at the design phase. Moreover, an Encroachment Agreement would need to be obtained from Caltrans and thus the plans (including any drainage facilities) would be reviewed by Caltrans and approved by Caltrans prior to execution of the Encroachment Agreement to ensure the plans comply with all standards and ensure there would not be an impact to drainage.

Traffic volumes, congestion and pedestrian safety

Public comment was received regarding the addition of project trips to the road network, the potential for hindering response time from the Cool Fire Station 72, and an impact to pedestrian safety.

The commenter did not consider the pass-by-trips or how the trips are distributed on the transportation network. The added trips produced by the Project are shown in Figure 4 of the traffic study. All the trips were considered in the analysis in the traffic study. The traffic engineer analyzed all access points and driveways, including the fire station access and found no location requiring mitigation.

The Project will contribute toward the construction of the Class II bike lane as a condition of approval. The Class II bike lane on the east side of SR 49 is consistent with the Active Transportation Plan developed by the El Dorado County Transportation Commission in 2019.

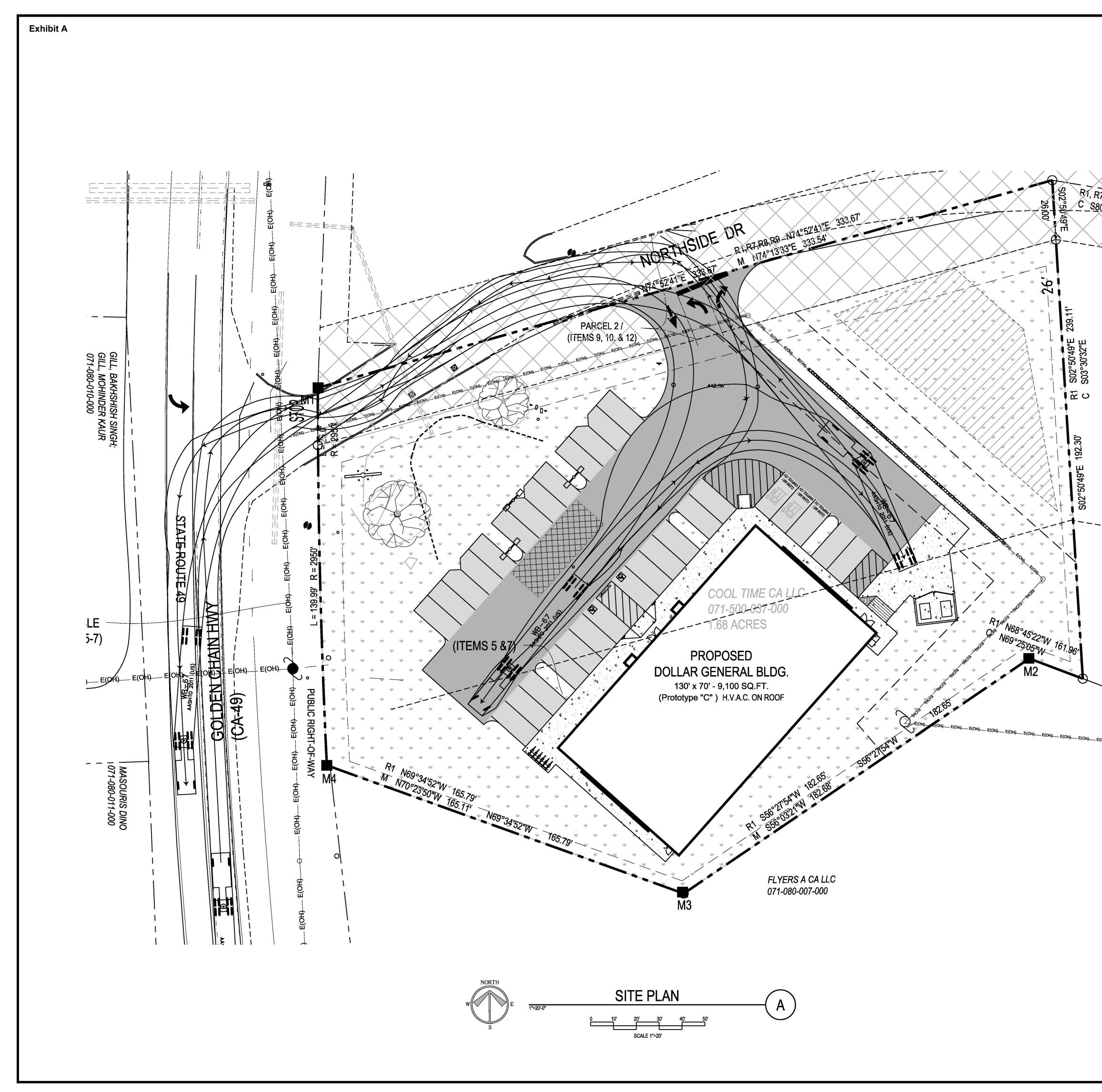
The traffic study did include a discussion on the history of collisions in the vicinity, see page 13 of the traffic study. The statewide collision rate for rural three-lane roads (i.e., with a two-way left turn lane) is 0.94 per Million Vehicle Miles (MVM). Over the three years of data collected for the study, the rate for the SR 49 segment is 0.42 per MVM.

The intersection of SR 49/SR 193 contains crosswalks on two of the four legs. The crosswalks are typically placed to guide pedestrians to the safer location to cross the roadway. There are no sidewalks in the vicinity. The installation of a Class II bike lane on the east side of SR 49 will provide additional width for bicycle and pedestrians.

The El Dorado County Transportation Commission's 2019 Active Transportation Plan provided the guidance for staff's condition of approval addressing non-motorized, i.e., bicycles and pedestrians, pathways. The Plan considers the need and safety of bicycles and pedestrians in conjunction with the requirements of road improvements. The Class II lane will require a Caltrans encroachment permit. Caltrans will ensure the appropriate design standards are implemented with the construction of the Class II lane. The PM peak counts collected for the traffic study, indicate one bicycle and no pedestrians were counted at the intersection of SR

49/SR 193. Also, no bicycle or pedestrians were counted at the intersection of SR 49/Northside Drive. The count sheets are included in the technical appendices of the traffic study.

Northside Drive is a private roadway but the County did require widening for the Project frontage consistent with the fire safe codes. The two driveways onto Northside Drive were appropriately spaced and analyzed as separate entrances.



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Natalie Porter <natalie.porter@edcgov.us>

FW: Cool Dollar General appeal.

1 message

 Ken Anderson
 KAnderson@kdanderson.com>
 Fri, Jun 12, 2020 at 3:51 PM

 To: Natalie Porter <natalie.porter@edcgov.us>, Tia Raamot <tia.raamot@edcgov.us>, Dave Spiegelberg
 <dave.spiegelberg@edcgov.us>

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Natalie Porter, Tia Raamot and Dave Spiegelberg:

It has come to my attention that County staff has been tasked to prepare responses to some of the public comments regarding the traffic analysis for the Cool Dollar General Store IS/MND. To facilitate that effort I would like to identify two issues that may need to be addressed which have no effect on the significance of project impacts but may provide clarity.

- 1. Table 9 on page 19 of the March 9, 2020 traffic impact analysis incorrectly concludes that the Southbound left turn lane on SR 49 at the SR 193 intersection is not adequate. Comparison of the available storage (i.e., 200 feet and the forecast 95th percentile queue length (180 feet) indicates that under County guidelines because the queue length does not exceed the storage, the lane is actually adequate.
- 2. On page 5 of the traffic impact analysis notes the minimum LOS standard for roadways and intersection as LOS E in Urban areas and Community Centers and as LOS D in Rural Centers and Regions except as specified in the General Plan. I should have noted that on page 71 of the amended General Plan Circulation Element the General Plan identifies those roads that are allowed to exceed the minimum LOS standard and operate at LOS F. The segments of SR 49 from US highway 50 to SR 193 and SR 49 from SR 193 to the county line are listed. The document should indicate that LOS F is the applicable standard for SR 49.

Thanks

Ken

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