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**Subject:** Soitec - Traffic EIR section  
**Date:** Wednesday, August 28, 2013 2:00:35 PM  
**Attachments:** [Ch 2.13 Traffic.doc](#)

Hi Ashley & Mindy,

Attached is the Traffic EIR section, and below are our responses to the County's comments. We anticipate your review to be complete by September 11<sup>th</sup>.

Please let us know if you have any questions.

Thanks,  
Megan

16 - 1	Chapter 2.13- Transportation Traffic	The traffic estimates are based on a 30% reduction in construction worker traffic. This was also included in the air quality section and must appear as an implementable pdf or mitigation measure. Traffic estimates are also based on preliminary off-site water needs which may need to be updated prior to finalizing the analysis.	As stated in Chapter 2.3, Air Quality, Project Design Feature (PDF) AQ-2 includes mandatory implementation and participation in a construction worker ridership program that would achieve a 30% reduction in single-occupancy vehicle trips. The reporting protocol for the ridership program is discussed in Chapter 2.3, Air Quality.  Trips associated with off-site water needs are incorporated into the ADT and AM Peak Hour characterization of construction traffic presented in Section 2.13.	5/31/2013	
16 - 2	Chapter 2.13- Transportation Traffic	Application of County Guidelines of Significance is required. Significance conclusions are for the whole project. Be sure that there is evidence to logically conclude that the impacts do not exceed the guideline. Compliance with the County's Community Trails Master Plan must be addressed.	The analysis has been revised to incorporate County Guidelines of Significance. In addition, County provided direction regarding the application of County guidelines to the analysis of the Proposed Project (Traffic section of the Sugarbush Residential Development Project EIR was provided to Dudek by the County on 08/07/2013).  Per County meeting on 7/3 and concurrence from County legal counsel, proposed trails and pathways in the Boulevard Community Trails and Pathways Plan will not be analyzed for impacts.	5/31/2013	
16 - 3	Chapter 2.13- Transportation Traffic	Page 2.13-3: The document does not need to demonstrate whether or not the individual project sites needed a TIS. However, outside of the DEIR, the 4 projects together must have reasonable traffic projections to determine if a TIS is warranted.	Construction and operational traffic assumptions are included in Section 2.13 Transportation and Traffic. Traffic numbers are based on data provided by the applicant and used to approximate air quality and GHG impacts.	5/31/2013	
16 - 4	Chapter 2.13- Transportation Traffic	Page 2.13-24: Since the construction schedules are projected for 2 of the 4, determine if there would be significant impacts with both construction schedules. Explain that the schedules for LanE and LanW are planned for after the first two and project a relative level of significance for these two projects as if they were constructed together. It is also possible to have a condition of approval or pdf to require separate construction schedules in order not to exceed the guideline.	A worst case traffic scenario regarding traffic anticipated during the most intense phases of construction when schedules for the Tierra del Sol and Rugged solar farm projects could overlap is presented in Section 2.13.	5/31/2013	
16 - 5	Chapter 2.13- Transportation Traffic	Provide a section on glare as a potential road safety hazard. It may be best to discuss it under the Guideline: "Include a design feature or a physical configuration of its access roads that may adversely affect the safe movement of all users along the roadway."	A discussion regarding potential glare impacts on motorists in the vicinity of the solar farm projects has been incorporated into Section 2.13 within the traffic hazards due to a design feature guideline for determining significance.	5/31/2013	
16 - 6	Chapter 2.13- Transportation Traffic	A project specific cumulative analysis may be required. The section now concludes significance without any analysis (significance cannot be assumed). Perhaps we can approach this as if the projects' contribution could not be substantial (for some particular factual reasons) or that cumulative impacts are less than significant per the traffic report requirements.	The cumulative analysis has been revised to include an analysis of future projects in the area (for construction traffic) and for operational traffic.	5/31/2013	
16 - 7	Chapter 2.13- Transportation Traffic	Staff will discuss required changes to this section at a scheduled meeting.	Understood .	5/31/2013	

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