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<b>Project Title:</b>	Fountain Wind Project
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<b>Organization:</b>	Stantec Consulting Services, Inc.
<b>Submitter Role:</b>	Applicant Consultant
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Data Request Identifier	Request Source	Topic	Information	Adequate	Information Required To Make AFC Conform With Regulations	Applicant Response
	Deficiency Letter Matrix	Traffic and Transportation	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	No	<b>Please expand the analysis of Impact 3.14-2.</b> Impact 3.14-2 of Section 3.14.3 (Direct and Indirect Effects) presents the analysis of the project relative to CEQA Guidelines Section 15064.3(b), which relates to the evaluation of a project's transportation impacts. Specifically, analysis using vehicle miles of travel (VMT) is identified as the most appropriate measure for the analysis of transportation impacts. The analysis of Impact 3.14-2 relies on GHG analysis in Sections 3.10, GHG Emissions, since the intent of SB 743 is to encourage land use and transportation planning decisions and investments that reduce VMT threshold, the County decided to rely on an established environmental standard that is protective of resources of legislative concern. The less-than-significant impact finding is in part a result of a potential net offset of annual CO2e emissions with implementation (i.e., due to ongoing power generation). The VMT analysis demonstrates that the project will result in a short-term increase in VMT during construction. However, no discussion or analysis is presented of potential TDM strategies (carpooling, ridesharing, etc) or other measures that could be implemented to reduce VMT during construction, although identified in Appendix H, Page 17.	See Section 8.1 of the Updated TIA for discussion of carpooling as a means to reduce construction-related VMT.
	Deficiency Letter Matrix	Traffic and Transportation	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	No	<b>Please update Section 3.14.1.3 (Regulatory Setting) of the DEIR Transportation Section.</b> The Regulatory Setting should include reference to the Regional Transportation Plan & Sustainable Communities Strategy for the Shasta Region and Caltrans Transportation Concept reports for each State route in the study area. Also please verify the scale of Exhibit 1 of the Traffic report.	The Regulatory Setting section of the CEC EIR made a reference to the Regional Transportation Plan and Sustainable Communities Strategy for the Shasta Region (2015) and the Route 299 TCR (210). Links to these documents are provided here: <a href="https://dot.ca.gov/-/media/dot-media/district-1/documents/Signed-FINAL-299-TCR-12_10_a11y">https://dot.ca.gov/-/media/dot-media/district-1/documents/Signed-FINAL-299-TCR-12_10_a11y</a> and <a href="https://www.srta.ca.gov/142/Regional-Transportation-Plan">https://www.srta.ca.gov/142/Regional-Transportation-Plan</a> . Table 1.2 of the Updated TIA for more information about the functional classification, truck route designations, and weight and load limitations of California State Route 299. Exhibit 1 is scaled as printed.
TRAF-004	Deficiency Letter Matrix	Traffic and Transportation	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	No	<b>Please expand the description of regional and local roadways affected and/or serving the proposed project.</b> For logical study segments, the descriptions should summarize the roadway functional classification number of directional travel lanes, posted speed limits, average daily traffic volumes served, applicable weight restrictions, and truck route designation. Also please verify the scale of Exhibit 1 of the Traffic report.	The requested information is included in Tables 1.1 and 1.2 of the revised report. Each exhibit is scaled as printed.
TRAF-005	Deficiency Letter Matrix	Traffic and Transportation	Road classification and design capacity;	No	<b>Please update the capacities documented in Table 3.14-2.</b> The hourly capacities presented are base capacity values, representative of ideal conditions. Base capacities do not account for the impacts of heavy vehicles, grades or other sources of friction that will lower the capacity of a freeway or highway lane.	The capacities have been updated in Table 1.1 of the revised report as requested.
TRAF-006a	Deficiency Letter Matrix	Traffic and Transportation	Current daily average and peak traffic counts;	No	<b>Please collect new average daily vehicle traffic counts.</b> Traffic data from Caltrans Traffic Census Program, representing 2017 conditions, is documented. The data provided through the Caltrans Traffic Census Program are traffic volume estimates and not actual counts. In addition, the data is pre COVID-19 Pandemic and does not capture post pandemic changes in travel behavior. 24-hour vehicle classification traffic counts should be collected (in 15-minute increments) for a minimum three days (Tuesday, Wednesday, Thursday), during a representative time of year.	Average Daily Vehicle Traffic Counts have been collected near the projected access locations and are presented in Table 1.1 of the report. Raw traffic data is included in Appendix B of the report.
TRAF-007	Deficiency Letter Matrix	Traffic and Transportation	Current and projected levels of service before project development, during construction, and during project operation;	No	<b>Please update roadway capacity and intersection operations analysis.</b> As outlined above, the roadway capacity analysis was conducted using base capacity values that do not account for the impacts of heavy vehicles, grades or other sources of friction that will lower the capacity of a freeway or highway lane. In addition, the analysis needs to be updated based on new traffic count data.	The analyses have been revised as requested. Results are presented in Table 1.1 and Appendix D of the Updated TIA.
TRAF-008	Deficiency Letter Matrix	Traffic and Transportation	Weight and load limitations;	No	<b>Please expand the description of regional and local roadways affected and/or serving the proposed project.</b> Identify weight and load limitations on study roadways.	The requested information is included in Table 1.2 of the revised report.
TRAF-009	Deficiency Letter Matrix	Traffic and Transportation	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	No	<b>Please collect new average daily vehicle traffic counts.</b> The heavy vehicle percentages from Caltrans Traffic Census Program on SR 299 are provided. The data is pre COVID-19 Pandemic and does not capture post pandemic changes in travel behavior. 24-hour vehicle classification traffic counts should be collected (in 15-minute increments) for a minimum three days (Tuesday, Wednesday, Thursday), during a representative time of year when construction is anticipated.	Average Daily Vehicle Traffic Counts have been collected near the projected access locations and are presented in Table 1.1 of the report. Raw traffic data is included in Appendix B of the report.
TRAF-010	Deficiency Letter Matrix	Traffic and Transportation	An identification of any road features affecting public safety.	No	<b>Please collect collision records on study roadways.</b> Collect and map the most recent 3- year collision data available for the study corridors to identify locations where road features or characteristics may be affecting public safety. Expand impact discussion Impact 3.14-3 to incorporate relevant findings of collision analysis.	The requested information is included in Table 1.2 of the revised report.

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TRAF-006b	Deficiency Letter Matrix	Traffic and Transportation	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(C). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(C).	No	Please see above.	Please refer to Table 1.1 and Section 8.0 of the Updated TIA.
	Deficiency Letter Matrix	Traffic and Transportation	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.	No	<b>The Law, Ordinance, Regulation, or Standard Consistency Matrix (TN 248290) does not identify the specific Shasta County Code ordinances or standards that are applicable during construction and operation of the proposed facility.</b>	See Section 8.1 of the Updated TIA; Please also see LORS Matrix submitted as TN# 249636.
	Deficiency Letter Matrix	Traffic and Transportation	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	No	<b>Please provide agency contact information. The DEIR list of federal, state, and local agencies consulted does not include the contact's phone number, address, email address, or the subject matter relevant to the contact. The list does not indicate who should serve as the contact person for Commission staff.</b>	N/A. Applicant to provide requested information outside of traffic study. Please see table with local agency contact information submitted as TN# 249533.
TRAF-004	Follow-up Questions	Traffic and Transportation	A description of the methodology applied and the software used to complete the capacity analysis is missing.	No	<b>Not provided by CEC with follow-up questions</b>	Roadway capacity analysis was performed with HCS Software for the pre-construction, construction, and post-construction scenarios. Traffic data collected by Caltrans in 2020 and roadway characteristics observed from desktop review (i.e., speed limit, number and width of lanes, etc.) were used to calculate roadway capacity. Project access Level of Service (LOS) methodology is described in Section 8.2.
TRAF-010	Follow-up Questions	Traffic and Transportation	An analysis of the collision records is missing. Table 1.2 of the revised report (TN# 250644) includes total number of collisions. However, no information is provided relative to how the collision rates compare to statewide averages for similar facilities or how the characteristics of the roadway that may be affecting public safety or contributing to the reported collisions?	No	<b>Not provided by CEC with follow-up questions</b>	Noted. To facilitate statewide crash averages for similar facilities in California, crash comparisons were initially performed for the most recent year, 2020. However, due to the Covid-19 pandemic, Westwood expanded crash data analysis to include the years 2018, 2019, and 2020 to ensure any pandemic outliers did not skew data analysis. To include the expanded data set, Table 1.2 was updated and Table 1.3 was added to reflect additional crash analysis within boundaries of the project site commuter and delivery routes, in conjunction with statewide data (see Appendix C). The crash rates along the roadway segments of SR 299 are less than the statewide averages for similar 4-lane divided and 2/3-lane facilities.
TRAF-001	Follow-up Questions	Traffic and Transportation	Thank you for providing the inputs for the VMT calculation in Exhibit 4. Please confirm the total VMT calculation, which shows 4,766,749. It appears that the Total Aggregate for Compaction Deliveries may have been double counted.  However, Exhibit 4 of the updated Traffic Impact Analysis (TN# 250985) does not quantify the potential reduction in VMT through implementation of carpooling.  Also, the calculation of VMT per capita in the 4th paragraph Section 8.1 (Page 16) of the revised report (TN# 250985) should identify the assumed vehicle occupancy. It appears to be 2 employees per vehicle. Please conform and update the analysis accordingly.	No	<b>Not provided by CEC with follow-up questions</b>	I thank you for the comment. The VMT for the Total Aggregate for Compaction Deliveries has been double counted. The revised VMT is 4,283,329. A revised Exhibit 4 is included in the attached revised traffic impact analysis.  The VMT assumes a vehicle occupancy of 2 full time employees per truck. The 36,966 two-way truck trips that were calculated from the developer's full time labor calculations were derived with this assumption. Please refer to the revised Exhibit 4.  The calculation of post-construction VMT per capita in Section 8.1 has been updated to identify the originally assumed vehicle occupancy of 2 full time employees per truck.
TRAF-004	Follow-up Questions	Traffic and Transportation	Please describe in the text of Section 8.2 of the updated Traffic Impact Analysis (TN# 250985) which Highway Capacity Manual (HCM) methodologies were applied using the Highway Capacity Software (HSC).	No	<b>Not provided by CEC with follow-up questions</b>	A description of the methodology applied and the software used to complete the roadway capacity analysis was added to Section 3.0 of the report.  The LOS analyses for the project accesses in Synchro/SimTraffic are based on the Two-Way Stop Control (TWSC) methodology from the 6th edition of the Highway Capacity Manual (HCM). This description has been added in Section 8.2 of the report.
TRAF-010	Follow-up Questions	Traffic and Transportation	The comparison of the collision rates to statewide averages was responsive to the request.  Please review the statewide averages that are being used for the comparison to make sure the correct rates are applied, relative to the area type that the roadways are located (i.e., Urban vs. Rural). In addition, the conclusion of the analysis presented in Applicant Response No.2 should be incorporated into the text to discuss the conclusions of the analysis presented in Table 1.3 of the updated Traffic Impact Analysis (TN# 250985).  The characteristics of the collisions (i.e., primary collision factors) and any characteristics of the roadways that may be affecting public safety was not addressed.	No	<b>Not provided by CEC with follow-up questions</b>	Noted.  Based on roadway geometry and proximity to urban centers, the following segments are characterized as "Urban": I-5 to Hawley Road, Hawley Road to Old Oregon Trail, Tamarack Road to Elm Street, and Elm Street to Plumas Street. All other segments not specified above are characterized as "Rural". The conclusion of the analysis presented in Applicant Response No. 2 has been incorporated into Section 3.0 of the text.  Of the 81 crashes observed along SR-299, of which were 7 fatal crashes, 40% had an "Improper Turning" Primary Crash Factor (PCF). For fatal crashes, the predominant PCF, comprising of 43% of all fatal crashes was due to "Improper Turning". 75% of all crashes occurred under daylight conditions, and 99% of crashes occurred on roads with "No Unusual Conditions". Based on these results, the crashes observed along SR-299 appear to be due to driver behavior instead of roadway characteristics.