

DEPARTMENT OF TRANSPORTATION

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March 4, 2008

SON101892
 SON-101-2.93
 SCI # 2006022107

Mr. Steve Dee
 Sonoma County PRMD
 2550 Ventura Avenue
 Santa Rosa, CA 95403

Dear Mr. Dee:

Dutra Haystack Landing (PLP04-0046) – Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the review process for this project. Our comments below are based on the review of the DEIR. As lead agency, Sonoma County is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, and implementation responsibilities as well as lead agency monitoring should be fully discussed for all proposed mitigation measures and the project's traffic mitigation fees should be specifically identified in the DEIR. Any required roadway improvements should be completed prior to issuance of project's use permits. An encroachment permit is required when the project involves work in the State's right of way (ROW). The Department will not issue an encroachment permit until our concerns are adequately addressed. Therefore, we strongly recommend that the lead agency ensure resolution of the Department's CEQA concerns prior to submittal of the encroachment permit application; see the end of this letter for more information regarding the encroachment permit process.

A6-1

Forecasting

The report assumes that all truck entries and exits will cease at 4:00 every day so they will have no effect on the PM peak hour traffic. This may be the usual operating procedure, but what assurance is there that the plant will not sometimes have extended hours of operations into the evening? It may sometimes be supplying a large project on a compressed schedule that continues operations into the evening. Also, the projects effect on traffic from 3:00 to 4:00 PM should be examined. While not the PM peak, traffic is certainly increasing at that time and the traffic patterns will differ from the AM peak such that the effects may be significant.

A6-2

Highway Operations

1. Page III-55: Proposed improvements include curbs along the northbound off-ramp. Curbs should not be used on ramps.

A6-3

2. Page V.J-1: Existing traffic volumes were derived between 2003 and 2004. Existing traffic data should not be more than three years old. Also, it is stated that the volumes were increased by two percent annually to account for traffic growth. Were these volumes validated and checked against the Department's most recent traffic data? A6-4
3. Figure V.J-1 (Location Map and Existing Turning Movements) and Appendix A:
 - The NB lane configuration at Petaluma Blvd South at the US 101 SB ramps does not match the lane configuration coding used in the calculation sheets of Appendix A. In addition, Table V.J-1 indicates a "NB ThruLeft" at this intersection. Which one is correct?
 - Petaluma Blvd South is a two-lane principal arterial roadway under existing conditions. It is not accurate to use the lane configuration as shown in this figure to calculate the level of service at Petaluma Blvd South/Landing Way, i.e. one-lane through and one-lane ThruLeft for NB direction, one-lane through and one-lane ThruRight for SB direction.A6-5
4. Table V. J-5 (Near-Term Cumulative Without Project Intersection LOS): There is no SB ThruLeft movement at Petaluma Blvd South/Landing Way. See the lane configuration in Figure V.J-2. A6-6
5. Page V.J-9: The statements in the written paragraph on this page are incorrect:
 - As shown on Table V.J-3, Highway 101 SB-South of Petaluma Blvd South operates at LOS F under existing conditions. Therefore, the statement "... degrade from LOS E to LOS F" is incorrect.
 - As shown on Table V.J-7, Highway 101 SB-North of Petaluma Blvd South and SB Off-Ramp operate at LOS F under near-term cumulative conditions. Therefore, the statement "... whereas other facilities appear to operate acceptably" is incorrect.A6-7
6. Figure V.J-3 (Cumulative 2020 Without Project Turning Movements): When comparing Figure V.J-2 and Figure V.J-3, the volumes of some movements are less under Cumulative 2020 Conditions than under Near-Term Cumulative Conditions. Please explain why. A6-8
7. Table V.J-8 (Cumulative 2020 Without Project Intersection LOS):
 - For consistency, the headline should be "Cumulative 2020 Without Project" instead of "Near-Term Cumulative Without Project".
 - There is no SB ThruLeft movement at Petaluma Blvd South/Landing Way. See the lane configuration in Figure V.J-3.
 - The NB Left delay at Petaluma Blvd South/Highway 101 NB On-Ramp is 8.3 seconds instead of 83.3 seconds.A6-9
8. Page V.J-12, last paragraph: It is stated that the SB segments north of Petaluma Blvd South would operate unacceptably during the AM peak hour. However, according to Table V.J-10, Highway 101 SB-North of Petaluma Blvd South operates at LOS D during the AM peak hour under cumulative 2020 conditions. (The minimum acceptable level of service threshold is LOS D, as listed in the "Highway Operations" section on Page V.J-4.) A6-10

9. Figure V.J-7 (Existing Plus Project Turning Movements): Petaluma Blvd South is a two-lane principal arterial roadway under existing conditions. It is not accurate to use the lane configuration as shown to calculate the level of service at Petaluma Blvd South/Landing Way, i.e. one-lane through and one-lane ThruRight for NB direction, one-lane through and one-lane ThruLeft for SB direction. A6-11
10. Page V.J-24 (Intersection LOS Criteria): It is stated in the third paragraph that "The County level of service standard for intersections is LOS D or better". However, on Page V.J-2 under section "Existing Levels of Service", paragraph 2 states that "According to the Sonoma County level of service policy, the threshold for intersection level of service is LOS E." Please clarify. A6-12
11. Table V.J-14 (Existing and Existing Plus Project Intersection LOS): There is no NB ThruLeft movement at Petaluma Blvd South/Highway 101 SB Ramps. See the lane configuration in Figure V. J-7. A6-13
12. Table V.J-16 (Existing and Existing Plus Project Highway Operations): The existing SB off-ramp operates at LOS F on Table V. J-16, while it operates at LOS C on Table V.J-3 (Existing Highway Operations). Additional traffic from the project degrades the SB off-ramp from LOS C to LOS F. This is a significant impact. What is the mitigation measure for this impact? A6-14
13. Page V.J-31 (Mitigation Measure TRANS-4): The proposed signal at the intersection of the project driveway and South Petaluma Blvd does not meet signal warrants. If signals are installed, include advance intersection warning sign and flashing beacon on the northbound off-ramp. A6-15
14. Figure V.J-9: Near-Term Cumulative with Project Turning Movements: By looking at the turning movements, it appears that mitigation is needed on Petaluma Blvd South. There are a significant amount of vehicles on the mainline with a speed "just below 60 MPH" (per Page V.J-2), which raises a capacity issue and a safety concern for left-turning vehicles. Heavy trucks and buses occupy a significant amount of the storage from the single through and left-turn lanes. Mitigation is needed for these specific conditions. A6-16
15. Page V.J-33 (Impact TRANS-6): In paragraph 3, it should be "... with 78.8 seconds of delay ..." according to Table V.J-17. A6-17
16. Table V.J-17 (Near-Term Cumulative Without and Plus Project Intersections Levels of Service): There is no SB ThruLeft movement at Petaluma Blvd South/Landing Way. See the lane configuration in Figure V.J-9. A6-18
17. Table V.J-20 (Cumulative 2020 Without and Plus Project Intersection Levels of Service):
 - There is no SB ThruLeft movement at Petaluma Blvd South/Landing Way. See the lane configuration in Figure V. J-10. A6-19

Cultural Resources

The Cultural Resource Studies conducted for this project do not include the areas for interchange improvements to US 101/Petaluma Boulevard South, right-of-way dedication, signal installation, acceleration/deceleration lanes.

Pursuant to CEQA, PRC 5024, and the Department's Environmental Handbook Vol. 2, should ground disturbing activities within the Department's ROW become a part of this project, the Department will require a Cultural Resource Study that includes the following before an Encroachment Permit can be issued:

- A current record search from the Northwest Information Center;
- An evaluation of the sensitivity for buried unrecorded sites within the area of impact.

If an archaeological site is identified within the Department's ROW, the following will be required:

- Effects evaluation of potential project impacts to the archaeological site;
- Mitigation plan per CEQA Guidelines 15126.4(b)(3);
- Evidence of consultation with the territorial Native American group(s) for the area pursuant to PRC 5097.

A6-24

The above report(s) are to be submitted to:

Office of Cultural Resource Studies, MS 8A
CA Department of Transportation
P.O. Box 23660
Oakland, CA 94623-0660

If an archaeological site is identified within State ROW, avoidance is the preferred mitigation for archaeological sites under CEQA; however, CEQA Guidelines 15126.4(b)(3) provides a discussion of archaeological mitigation. Archaeological monitoring is not appropriate mitigation prior to evaluation of a resource.

If a Cultural Resource Evaluation results in the finding of a historically or culturally significant resource, and based on the project impacts to this resource, a Data Recovery Plan may be necessary. This Plan must be approved by the Department's Cultural Resource Studies Office before an Encroachment Permit can be issued.

Encroachment Permit

Please be advised that any work or traffic control that encroaches on State ROW requires an encroachment permit issued by the Department. Further information is available on the following website: <http://www.dot.ca.gov/hq/traffops/devlopserv//permits/>. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address:

A6-25

- Under 2020 Plus Project Conditions, the intersection of Petaluma Blvd South/Highway 101 SB Ramps would operate with 59.7 seconds of delay at LOS F during AM peak hour. The increase in delay would be 6.4 seconds above conditions without the project. In the section "Intersection LOS Criteria" on Page V.J-24 it is stated that "If an intersection is already operating at LOS F, the project's impact is significant and cumulatively considerable if it causes the delay to increase by five seconds or more". Therefore, this is a significant impact.

A6-19
(cont'd)

18. Page V.J-39 (Mitigation Measure TRANS-10): According to comment #16, the statement "... Impact TRANS-10 was found to be less than significant ..." is incorrect. What are the mitigation measures for the significant impact?

A6-20

19. Page V.J-39 (Impact TRANS-11): It should state "... on the northbound approach ..." instead of eastbound approach in line 2.

A6-21

20. Table V.J-22 (Cumulative 2020 Without and Plus Project Highway Operations):

- Change the title to "2020 No Project" instead of "Near-Term" and "2020 Plus Project" instead of "Near-Term Plus Project".
- According to Table V.J-10, Highway 101 SB-South of Petaluma Blvd South would operate at LOS F under Cumulative 2020 Without Project conditions. Since "The project would add trips to congested segments of southbound Highway 101 south of Petaluma Blvd South during the AM Peak hour", why would the segment operate at better than LOS E under Cumulative 2020 Plus Project conditions?

A6-22

Visual Impacts

We agree with the findings of the DEIR regarding scenic vistas and visual characteristics, other than the use of redwoods for screening. If the project is to go ahead with construction, the Department would like to see that the following mitigation measures be implemented:

1. More landscape screening throughout the project site to further screen the proposed project.
2. Preserving existing trees between the project site and US 101.
3. Screen plantings shall be similar in form, line, color and texture of immediately surrounding trees and vegetation.
4. Exterior building surfaces shall match the hue, lightness and saturation of colors of the immediate surrounding trees and vegetation.
5. Area A and D shall not be used to store equipment, tools, aggregate, etc.
6. Areas B, C and D shall be free of trash, debris, non-operative vehicles and equipment, unless screened from off-site views.
7. Redwood trees are not recommended for screening next to Highway 101 as they are not native to this specific area. A palette of native inland trees is recommended instead.

A6-23

Mr. Steve Dee/ Sonoma County PRMD
March 4, 2008
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Julie Hsu, Branch Chief, Office of Permits
California DOT, District 4
P.O. Box 23660
Oakland, CA 94623-0660

A6-25
(cont'd)

Should you require further information or have any questions regarding this letter, please call or email Ina Gerhard of my staff at (510) 286-5737 or ina_gerhard@dot.ca.gov.

A6-26

Sincerely,

signed for Christian Bushong
LISA CARBONI
District Branch Chief
IGR/CEQA

c: State Clearinghouse