

April 20, 2023

by email only Corinne Resha [corinne.resha@edcgov.us]

Ms. Corinne Resha
Senior Planner
County of El Dorado
Planning and Building Department
2850 Fairlane Court, Building C
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RE: Cameron Meadows Tentative Subdivision Map (File # TM23-0003)
Comments on Draft Transportation Studies

Dear Ms. Resha:

I was engaged by Rescue Rasmussen Pond Alliance to review and comment on the Draft Transportation Impact Study (TIS) and Draft Vehicle Miles Traveled (VMT) Analysis for the Cameron Meadows Tentative Subdivision Map project.¹ This letter presents my summary qualifications and comments on each of these documents. The words below convey my opinion of matters that require revision to provide clear, complete descriptions and details of the analyses conducted.

Summary of Qualifications

I am a registered Civil Engineer and Traffic Engineer in California and have over 40 years of diverse experience covering all phases of project delivery, including preliminary assessment, conceptual planning, feasibility, design, and construction. I have demonstrated expertise in transportation, traffic, and transit planning, engineering, and design related to transit-oriented development, transit facilities, parking facilities, roadway and highway improvements, large and small development projects, neighborhood, community, downtown, city, subarea, county, and sub-regional plans, and transit and highway corridors. Finally, I have authored and managed dozens of transportation and circulation studies supporting environmental impact reports for transportation improvements and development projects of all kinds and sizes.

Comments on Draft TIS

1. (p. 7) The number of dwelling units, 173, should be reconciled with the value in the Project Description, 161, and reported in the Final TIS. The Final TIS should also address the estimated trip generation of the 16 accessory dwelling units (“ADUs”).
2. (p. 7) A “Silva Valley Parkway” - a roadway apparently outside of the study area - is described in the paragraph about Meder Road.

¹ Documents reviewed: [Transportation Impact Study \(TIS\), Cameron Meadows, El Dorado County, California](#) (Kimley-Horn, Draft, September 22, 2022) and [Cameron Meadows - DRAFT VMT Analysis](#) (Kimley-Horn, September 22, 2022).

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3. (p. 10) The discussion of project area roadways should include critical streets serving the Proposed Project, including Mira Loma Drive and Carousel Lane, and Ponderosa Road, connecting Meter Road to US 50. Similarly, this discussion should describe the freeway facilities listed.
4. (p. 13) The El Dorado County Travel Demand Model (TDM) and its geographic extents, parts, nomenclature, and procedures should be described to give the reader a clear understanding of context, procedures, and typical outputs. Here, the “select-zone analysis” used to develop critical trip forecasts should be explained and documented to effectively “show the work.” It is noted that the Draft VMT Analysis states on page 4 that “...the Project is not captured in the County’s future land use projections.” This apparent fact should have been documented and discussed in this Draft TIS, along with details about any other projects not included in said projections. See comment five below, which is directly relevant to this point.
5. (p. 26) The development of Existing (2022) Plus Proposed Project Conditions should be explained and documented to give the reader a clear understanding of context, procedures, and results.
6. (p. 30) The development of Near-Term (2032) Conditions should be explained and documented to give the reader a clear understanding of context, procedures, and results. This should include a complete summary of approved but not completed projects and their respective trip generation and accumulative sum, which should be compared and contrasted to similar results.
7. (p. 36) The development of Near-Term (2032) Plus Proposed Project Conditions should be explained and documented to give the reader a clear understanding of context, procedures, and results.
8. (p. 41) The development of Cumulative (2042) Conditions should be explained and documented to give the reader a clear understanding of context, procedures, and results.
9. (p. 47) The development of Cumulative (2042) Plus Proposed Project Conditions should be explained and documented to give the reader a clear understanding of context, procedures, and results.
10. (p. 58) The intersection queuing results show the impacts of the Proposed Project at three intersections (#1, #5, #11), and no improvements are stated. The TIS should include specific modifications required for the Proposed Project.
11. (p. 63 number 1) The discussion about accident history, which indicates specific study area sites of concern, should include more explanation of context (what is it and why is it important) as well as particular facts cited in the referenced study that resulted in a “None Required” label under “Identified Action” in Table 28.
12. (p. 63 number 2) The basis for the finding of sufficiency regarding access points should be documented. For example, what analysis was done according to which standards and vehicle types?
13. (p. 63, number 3) The basis for the finding regarding parking should be documented. For example, what is the anticipated parking demand compared to the proposed parking supply? Also, does the proposed roadway design allow for on-street parking?
14. (p. 63, number 4) The basis for verifying adequacy regarding circulation by all vehicle types should be documented. For example, what analysis was done according to which standards and vehicle types?

15. (p. 63, number 5) The basis for the finding of adequacy regarding sight distance on-site should be documented. For example, what analysis was done according to which standards?
16. (p. 64) The basis for the adequacy finding regarding emergency vehicle access should be documented. For example, what analysis was done according to which standards and types of emergency vehicles?
17. (p. 64) The basis for the finding of adequacy regarding circulation by delivery vehicles should be documented. For example, what analysis was done according to which standards and delivery vehicle types?
18. (p. 64) The evaluation of access to public transit services should document the approximate walking distance from the Proposed Project to the bus stops cited. Also, any other non-fixed route transit services, such as paratransit and dial-a-ride, available to the Proposed Project residents should be documented.
19. (p.64) The discussion about travel demand associated with the Proposed Project should explain the context related to the noted goal to reduce travel demand and quantify the net increase in travel demand compared to the total travel demand on the County's road system.
20. (p.64) The discussion of non-motorized transportation should discuss the relevant attributes of the Proposed Project in addition to the mere connection to the external system.
21. (p.64) The discussion of complete streets implementation should address the Proposed Project. That is, was complete streets implementation considered and included in the design and, if so, how; and, if not, why?
22. (p. 65) The discussion of the Caltrans-required US-50 Safety Evaluation should be expanded to give the reader a clear understanding of the context, procedures, and results relating to the estimated Proposed Project effects on the freeway facilities.
23. (p. 65) The Conclusions section merely states two findings (facts) and a narrowly-defined conclusion. It should be expanded to give the reader a complete summary of key findings and a professional opinion or judgment about the Proposed Project in the context of transportation impacts.

Comments on Draft VMT Analysis

1. (p. 1) The number of dwelling units stated herein, 173, should be reconciled with the value in the Project Description, 161, and reported in the Final VMT Analysis. The Final VMT Analysis should also address the expected VMT associated with the 16 ADUs included.
2. (p. 1) The resolution number cited in the last paragraph (141-202003) differs slightly from the citation in the first paragraph of Methodology and Assumptions on page 2 (141-2020).
3. (p. 2) The last paragraph of Purpose and Analysis, at the top of page 2, should include supportive procedures and guidance extracted from the SB 743 Implementation Plan cited, giving the reader a clear understanding of the County's VMT thresholds and metrics established. Also, a simple illustration of the calculation of the residential threshold cited should be included to "show the math" (i.e., " $22.5 - (0.15 \times 22.5) = 19.1$ ").
4. (p. 2) The Methodology and Assumptions section needs to give a complete and clear picture of this critical topic. The El Dorado County Travel Demand Model (TDM) and its geographic extents, parts, nomenclature, and procedures should be described to give the reader a clear understanding of context, procedures, and typical outputs. This section should include critical assumptions and procedures, including the following.

1. Why only the base year version of the model was used
 2. More details of the VMT estimation tool and how it works
 3. What are trip lengths and why are they important, and why do they need adjustment?
 4. What intrazonal trips are, why they are essential, and how they were calculated.
 5. Use of Roman numerals to label specific trips.
 6. Context and use of the California Statewide Travel Demand Model (CSTDM) and California Household Travel Survey (CHTS) to support the analysis using the VMT estimation tool
 7. Details (location and specific content) of the separate Traffic Analysis Zone (TAZ) created for the Proposed Project
5. (p. 2) In the last paragraph, the derivation of the proposed project's estimated population must be clarified. The second sentence should be reviewed and rewritten, and the actual calculation should be shown.
 6. (p. 3) The second paragraph, which discusses the derivation of VMT for the Proposed Project, should include the actual calculation. As mentioned in 4.7. above, no available information clearly shows the "Project TAZ." Also, the last sentence says "detailed" VMT outputs are shown in Appendix B, whereas the data in Appendix B is a summary of results with no details of the calculations. The calculations should be conducted.
 7. (p. 3) The Cumulative Analysis should include the actual calculation of VMT for the Proposed Project. Also, as noted above for the 2018 Plus Project case, Appendix C has no detailed VMT outputs. The measures should be shown.
 8. (p. 4) The Final VMT Analysis should include a discussion of the development and impacts of mitigations for the significant implications noted for the 2018 Plus Project condition.
 9. (p. 4) The first two sentences under the second bullet in Findings are related to analysis and should not be included here. They would be better understood (refined to fit, of course) in the Cumulative Analysis section on page 3.

Conclusion

The Draft TIS and the Draft VMT Analysis do not sufficiently document context, procedures, and results and therefore do not provide suitable data and facts to allow the public and County officials to render necessary judgments regarding their adequacy.

Please get in touch with me if you have any questions or other requests.

Sincerely,
KRUPKA CONSULTING

Paul J. Krupka, PE
Sole Proprietor
Registered Professional Engineer in California
Civil C 47497, Traffic TR 1574

cc: Rob Harris (by email only)