Appendix F
Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review and Peer Review

URBAN CROSSROADS

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June 12, 2013

Mr. Eric Flodine
STRATA EQUITY GROUP
4370 La Jolla Village Drive, Suite 960
San Diego, CA 92122

Subject: Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review

Dear Mr. Flodine:

INTRODUCTION

The firm of Urban Crossroads, Inc. is pleased to submit this letter summarizing our review of the previously published traffic studies, environmental document, and data related to current study area conditions, regulations, and project description. As described hereafter, our review indicates that the previously completed traffic analysis continues to provide an adequate and defensible basis for considering potential project impacts in the context of the California Environmental Quality Act (CEQA).

DATA REVIEW

This letter reviews the current project description, environmental regulations, and study area conditions in the context of those conditions that were in place at the time that the primary project traffic study (Hacienda at Fairview Valley Traffic Impact Analysis (Revised), May 26, 2009, Urban Crossroads, Inc.) that was included in and referenced by the environmental document that was circulated in Fall of 2009 and the subsequent supplemental traffic analysis (Hacienda at Fairview Valley Existing Plus Project Conditions Supplemental Traffic and Air Quality Analysis, November 30, 2011, Urban Crossroads, Inc.) were prepared. The subsequent supplemental traffic analysis concluded that no additional impacts beyond those already identified in the circulated environmental document are expected based upon analysis of Existing Plus Project conditions.

Project Description

The project description in the published traffic study reports consist of 299 dwelling units of single family housing, 2,815 dwelling units of senior (active) adult housing, and 15 acres (up to 200,000 square feet) of neighborhood/community commercial retail center, and various parks/open space on 1,557 acres. The project description used in the published traffic study reports is consistent the current project description.

Environmental Regulations

The key environmental regulations related to traffic in place at the time that the project traffic analysis was completed include the California Environmental Quality Act (CEQA) and the traffic study requirements (guidelines) utilized by the County of San Bernardino and other potentially impacted agencies, such as the California Department of Transportation (CALTRANS). The traffic study guidelines used by the County of San Bernardino and CALTRANS have not been updated since the traffic study analysis was prepared.

The most recent substantive change in CEQA is related to recent court decisions indicating the need to include evaluation of "Existing Plus Project" analysis in the environmental documentation. The supplemental report published in 2011 includes this analysis and indicated that no additional impacts beyond those already identified in the environmental document circulated in late 2009 are anticipated.

Environmental Setting

Potential changes in the environmental setting for the traffic analysis could occur in two primary areas, the roadway system and / or in traffic volumes using or anticipated to use the roadway system. Urban Crossroads, Inc. staff performed a field visit in May, 2013 and inventoried all of the roadway segments and intersections that were analyzed in the previously published traffic study reports. The results of the 2013 field inventory are presented on Exhibit A. The following roadway segments changed compared to the data presented in the previously published traffic study report(s):

- Navajo Road from SR-18 to just south of Waalew Road has been widened from a 2 lane undivided roadway to a 2 lane divided roadway.
- Central Road from Cahuilla Road to "S" Road (south of Waalew Road) has been widened from a 2 lane undivided roadway to a 3 lane (2 northbound through lanes and 1 southbound through lane) divided roadway .
- Central Road from Sitting Bull Road to Ottawa Road has been widened from a 2 lane undivided roadway to a 2 lane divided roadway.

Three analysis intersections have also been improved to provide additional intersection approach lanes:

- Dale Evans Parkway at Waalew Road – The northbound approach has been widened to provide separate left and right turn lanes (previously a single shared lane).
- Navajo Road at Thunderbird Road - The northbound and southbound approaches have been widened to provide an exclusive left turn lane and a shared through-right turn lane (previously a single lane was shared for all three movements [left turns, through traffic, and right turns]).
- Central Road at Ottawa Road – The The northbound and southbound approaches have been widened to provide an exclusive left turn lane and a shared through-right turn lane (previously a single lane was shared for all three movements [left turns, through traffic, and right turns]).

These improvements all serve to provide additional roadway capacity in the study area. Therefore, the impacts identified in the published environmental document which assumed that these improvements were not yet in place are more conservative (i.e., provide a worst-case reporting of potential impacts) than what the current existing conditions reflect. Therefore, if the traffic technical analysis were to be revised, the end result would be to show lesser impacts than are identified in the current traffic study report and EIR.

Similarly, current traffic volume data has been obtained from databases maintained by CALTRANS for SR-18, which is the primary traffic route through the study area and the best available indicator of traffic volume trends in the study area from 2007 (when the traffic count data included in the environmental document that was circulated was collected) to 2011 (the

latest year for which data is available). The CALTRANS data is provided in Attachment A to this letter. The CALTRANS data has been used to prepare a traffic volume growth trend summary along SR-18 within the vicinity of the study area. The traffic volume growth trend summary is presented on Table 1. As shown on Table 1, traffic volumes along SR-18 throughout the study area have decreased by between 8 and 13 percent, with a total overall decrease of 11%. The decrease in traffic volumes could be related to current economic conditions, or other factors such as higher gas prices or changes in travel behavior due to increased emphasis on alternative modes of transport or an aging population that travels less. Therefore, the data contained in the traffic study is conservative (worst-case) compared to more recent (2011) conditions. If the traffic technical analysis were to be revised, the end result would be to show lesser impacts than are identified in the current traffic study report.

SUMMARY AND CLOSING

Based upon our review of the previously published traffic studies, environmental document, and data related to current study area conditions, regulations, and project description, the previously completed traffic analysis continues to provide an adequate and defensible basis for considering potential project impacts in the context of the California Environmental Quality Act (CEQA).

Urban Crossroads, Inc. is pleased to provide this review of the adequacy of the published traffic technical analysis for your use. If you have any questions regarding the information provided, please call me at (949) 660-1994, ext. 210.

Sincerely,

URBAN CROSSROADS, INC.

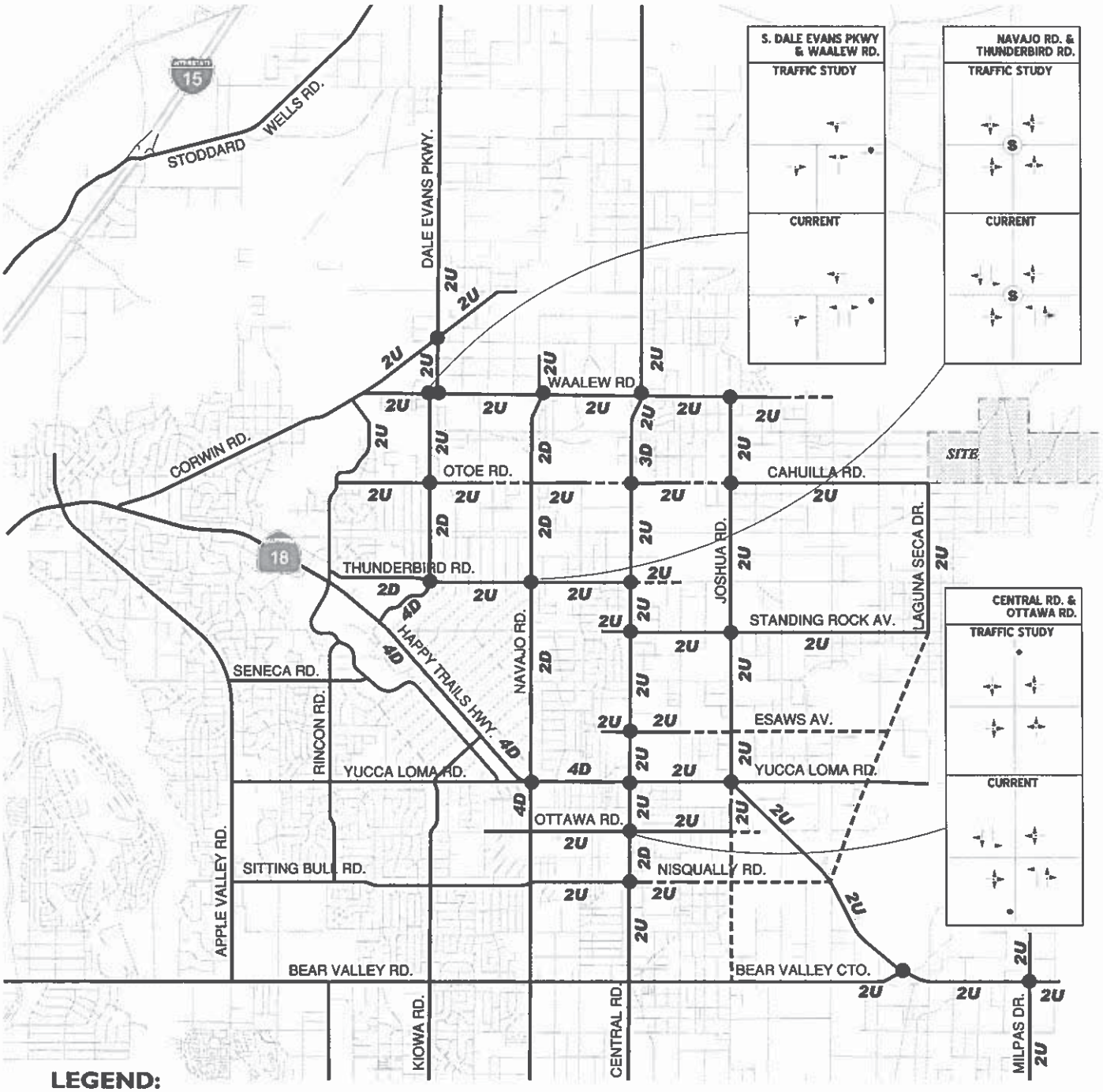
Carleton Waters, P.E.
Principal

CW:
JN:04946-43 Hacienda SP Traffic Analysis Adequacy Review.docx

Attachment

EXHIBIT A

EXISTING NUMBER OF THROUGH LANES AND INTERSECTION CONTROLS



LEGEND:

- ● = INTERSECTION ANALYSIS LOCATION
- ---- = DIRT ROAD
- *4* = NUMBER OF LANES
- *D* = DIVIDED
- *U* = UNDIVIDED
- (S) = ALL WAY STOP
- • = STOP SIGN

TABLE 1

TRAFFIC VOLUME GROWTH TREND SUMMARY

LOCATION	2007 DAILY VOLUME	2011 DAILY VOLUME	DIFFERENCE	% DIFFERENCE
SR-18 west of Bear Valley Cut-Off	5,500	5,000	-500	-9%
SR-18 west of Navajo Road	13,000	12,000	-1,000	-8%
SR-18 west of Dale Evans Parkway	27,000	23,500	-3,500	-13%
TOTAL	40,000	35,500	-4,500	-11%

U:\UcJobs_04600-05000_04900\04946\Excel\[caltrans volumes along sr-18.xlsx]1

ATTACHMENT A

CALTRANS TRAFFIC VOLUME DATA

2007 Data

District	Route	Rte Suf	County	PM Pre	Postmile	Description	Back Peak Hour	Back Peak Month	Back AADT	Ahead Peak Hour	Ahead Peak Month	Ahead AADT
8	18		SBD	T	6.179	SAN BERNARDINO, JCT. RTE. 30				2550	31500	30000
8	18		SBD	T	7.117	SAN BERNARDINO, PARKDALE DRIVE	2400	29500	28000	2150	26000	24500
8	18		SBD	T	7.548	SAN BERNARDINO, 40TH STREET	2150	26000	24500	1600	19300	18000
8	18		SBD	T	8.264	SAN BERNARDINO, SIERRA WAY	1600	19300	18000	1700	18800	17500
8	18		SBD		9.150	WATERMAN CANYON ROAD	1700	18800	17500	1650	18300	17000
8	18		SBD	R	13.285	WATERMAN CANYON ROAD INTERCHANGE	1650	18300	17000	1650	18300	17000
8	18		SBD	R	17.732	JCT. RTE. 138 NORTH	1650	18300	17000	900	9700	9000
8	18		SBD		20.612	JCT. RTE. 189 NORTH	900	9700	9000	1050	10700	7200
8	18		SBD		23.382	DALEY CANYON ROAD	1050	10700	7200	1600	12800	11100
8	18		SBD		24.712	JCT. RTE. 173 NORTH	1600	12800	11100	1300	10400	9000
8	18		SBD		25.810	KUFFEL CANYON ROAD	1150	9200	8000	1100	8600	7500
8	18		SBD		31.651	WEST JCT. RTE. 330	1100	8600	7500	1000	8100	7000
8	18		SBD		31.903	JCT. RTE. 330 SOUTH	1000	8100	7000	1550	12800	10500
8	18		SBD		34.520	GREEN VALLEY LAKE ROAD	1100	9200	7500	860	7100	5800
8	18		SBD		44.319	JCT. RTE. 38 NORTHEAST	920	7600	6200	670	5600	4600
8	18		SBD		46.550	BIG BEAR LAKE, BLUE JAY ROAD	680	5700	4700	880	7700	6300
8	18		SBD		48.070	BIG BEAR LAKE, MILL CREEK ROAD	1250	12000	9800	1100	10100	8300
8	18		SBD		48.362	LAKEVIEW DRIVE	1100	10100	8300	1350	12800	10500
8	18		SBD		49.117	BIG BEAR BL AT PINE KNOT	1700	13900	13000	4200	34000	32000
8	18		SBD		50.820	MOONRIDGE ROAD	4050	33000	31000	3000	24500	23000
8	18		SBD		51.610	STANFIELD CUTOFF	3000	24500	23000	2600	21300	20000
8	18		SBD		53.917	JCT. RTE. 38 EAST	2100	17000	16000	1450	11800	11000
8	18		SBD		54.537	JCT. RTE. 38 WEST	1450	11700	11000	530	5700	5500
8	18		SBD		58.160	HOLCOMB VALLEY ROAD	380	4150	4000	240	2600	2500
8	18		SBD		58.440	BALDWIN LAKE ROAD	240	2600	2500	290	3100	3000
8	18		SBD		65.756	MARBLE CANYON ROAD	290	3100	3000	360	3950	3800
8	18		SBD		73.783	LUCERNE VALLEY, JCT. RTE. 247	530	5700	5500	930	10100	9700
8	18		SBD		84.325	BEAR VALLEY CUTOFF	930	11200	10600	480	5800	5500
8	18		SBD		88.871	APPLE VALLEY, YUCCA LOMA-NAVAJO ROAD	1150	13700	13000	1800	22100	21000
8	18		SBD		90.936	APPLE VALLEY INN ROAD	2300	27500	27000	2900	35000	34000
8	18		SBD		94.390	APPLE VALLEY ROAD	2900	35000	34000	4100	49000	48000
8	18		SBD		95.220	VICTORVILLE, STODDARD WELLS ROAD	4100	49000	48000	3850	46000	45000
8	18		SBD		95.790	VICTORVILLE, SEVENTH STREET	3150	38000	37000	2750	33000	32000
8	18		SBD	R	96.577	VICTORVILLE, NORTH JCT RTE 15, BARSTOW FREEWAYJCT. RTE. 15	2400	28500	28000	4100	47000	44000
8	18		SBD		97.001	VICTORVILLE, AMARGOSA ROAD	4100	47000	44000	2950	34000	32000
8	18		SBD		100.956	JCT. RTE. 395	1750	20300	19000	960	11200	8700
8	18		SBD		115.910	SAN BERNARDINO/LOS ANGELES COUNTY LINE	750	7100	6700			
7	18		LA		0.000	SAN BERNARDINO/LOS ANGELES COUNTY LINE				750	7100	6700
7	18		LA		4.500	JCT. RTE. 138, PEARBLOSSOM/ANTELOPE HIGHWAY	710	7200	6700			

2011 DATA

Dist	Route	CO		Postmile	Description	Back Peak Hour	Back Peak Month	Back AADT	Ahead Peak Hour	Ahead Peak Month	Ahead AADT	
8	18	SBD	T	6.179	SAN BERNARDINO, JCT. RTE. 30				2400	29500	28000	
8	18	SBD	T	7.117	SAN BERNARDINO, PARKDALE	2200	27500	26000	2000	24400	23000	
8	18	SBD	T	7.548	SAN BERNARDINO, 40TH ST	2000	24400	23000	1500	18100	16900	
8	18	SBD	T	8.264	SAN BERNARDINO, SIERRA	1500	18100	16900	1650	17700	16500	
8	18	SBD		9.15	WATERMAN CANYON RD	1650	17700	16500	1600	17100	16000	
8	18	SBD	R	13.285	WATERMAN CANYON RD	1600	17100	16000	1600	17100	16000	
8	18	SBD	R	17.732	JCT. RTE. 138 N	1600	17100	16000	800	8600	8000	
8	18	SBD		20.612	JCT. RTE. 189 N	800	8600	8000	1200	8900	8000	
8	18	SBD		23.382	DALEY CANYON RD	1200	8900	8000	1500	11100	10000	
8	18	SBD		24.712	JCT. RTE. 173 N	1500	11100	10000	1200	8900	8000	
8	18	SBD		25.81	KUFFEL CANYON RD	1100	8000	7200	1050	7800	7000	
8	18	SBD		31.651	W JCT. RTE. 330	1050	7800	7000	1050	7800	7000	
8	18	SBD		31.903	JCT. RTE. 330 S	990	7300	6600	1550	11500	10000	
8	18	SBD		34.52	GREEN VALLEY LAKE RD	1200	8500	7400	960	7800	6000	
8	18	SBD		44.319	JCT. RTE. 38 NE	960	7800	6000	750	6100	4700	
8	18	SBD		46.55	BIG BEAR LAKE, BLUE JAY	770	6200	4800	910	8500	6500	
8	18	SBD		48.07	BIG BEAR LAKE, MILL CREEK	1350	12700	9800	1250	11700	9000	
8	18	SBD		48.362	LAKEVIEW DRIVE	1250	11700	9000	1450	13400	10300	
8	18	SBD		49.117	BIG BEAR/PINE KNOT	1550	13500	13000	3500	30500	29300	
8	18	SBD		50.82	MOONRIDGE RD	3600	31000	30000	2650	23100	22200	
8	18	SBD		51.61	STANFIELD CUTOFF	2650	23100	22200	2300	20000	19200	
8	18	SBD		53.917	JCT. RTE. 38 E	1850	16200	15600	1100	11100	10700	
8	18	SBD		54.537	JCT. RTE. 38 W	1100	11100	10700	500	5000	4900	
8	18	SBD		58.16	HOLCOMB VALLEY	380	3800	3700	240	2350	2300	
8	18	SBD		58.44	BALDWIN LAKE	240	2350	2300	270	2700	2600	
8	18	SBD		65.756	MARBLE CANYON	270	2700	2600	370	3700	3600	
8	18	SBD		73.783	LUCERNE VALLEY, JCT. RTE. 247	540	5400	5200	900	9000	8700	
8	18	SBD		84.325	BEAR VALLEY CUTOFF	930	9700	9400	450	5300	5000	
8	18	SBD		88.871	APPLE VALLEY, YUCCA LOMA-NAVAJO	1100	12700	12000	1700	20200	19000	
8	18	SBD		90.936	APPLE VALLEY INN RD	2100	24900	23500	2700	32000	30000	
8	18	SBD		94.39	APPLE VALLEY RD	2700	32000	30000	3950	46500	44000	
8	18	SBD		95.22	VICTORVILLE, STODDARD WELLS	3950	46500	44000	3600	42500	40000	!!
8	18	SBD		95.79	VICTORVILLE, SEVENTH ST	2950	35000	33000	2700	32000	30000	
8	18	SBD		96.571	VICTORVILLE, N JCT. RTE. 15	2400	28000	26500	3800	41500	40000	
8	18	SBD		97.001	VICTORVILLE, AMARGOSA	3800	41500	40000	2850	31000	30000	
8	18	SBD		100.96	JCT. RTE. 395	1850	20100	19500	970	9000	8500	
8	18	SBD		115.91	SAN BERNARDINO/LOS ANGELES CO LINE	560	5700	5000				
7	18	LA		0	SAN BERNARDINO/LOS ANGELES CO LINE				560	5700	5000	

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MEMORANDUM

To: Kari Cano – RBF Consulting

From: Bob Davis – RBF Consulting

Date: July 22, 2013

Subject: Peer Review of *Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review*

As requested, we have completed our peer review of the *Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review prepared by Urban Crossroads, June 12, 2013*, and offer the following comments and suggestions:

1. We concur with the Urban Crossroads finding concerning the" Project Description" and "Environmental Regulations."

2. We concur that potential changes in the environmental setting for the traffic analysis could occur in two primary areas including the roadway system and the existing traffic volume using the existing roadway system and/or the projected volumes using the roadway system.

3. We concur that it was necessary to update the inventory of the existing roadway system characteristics and to identify recent roadway and intersection improvements. While the improvements clearly provide additional roadway capacity, we do not agree that the conclusion made by Urban Crossroads that the impacts identified in the published environmental document are more conservative since the analysis assumes that improvements are not in place yet. This would only be valid if the existing traffic volumes have not increased in a manner that would offset the increase in capacity. If it can be demonstrated that traffic has not increased significantly at these locations, then the finding could be made that the original analysis was more conservative. I suggest that Urban Crossroads move their conclusion discussion to the end of the section after the discussion of changes in existing traffic volumes.

4. The findings regarding the comparison of traffic volumes on SR-18 are helpful in showing a decrease in volume between 2007 and 2011; however, it raises the question of how the volume has changed between 2011 and 2013. Within the last year or two the economy has

shown signs of improvement and may have resulted in an increase in traffic. I would strongly suggest that current traffic counts be taken on SR-18 to confirm and bolster this argument.

5. Similar to Comment #4, I would strongly suggest that additional traffic counts be taken in the area including some select roadway segments and at intersections that will carry the highest project-related traffic volumes. Traffic counts could also be taken at the intersection where capacity improvements were noted. With the updated counts, Urban Crossroads would be able to analyze the data and make a much more defensible conclusion.

6. Another comparison that could be made is related to "Other Planned Development." It may be helpful to review the list of other planned area development that was identified in the Traffic Impact Analysis." If it can be shown that very few of the projects have been built or if it can be shown that area traffic volume has decreased even though some of the projects have been built, this would help demonstrate that conditions are similar to what was assumed in the traffic study.

7. Since most traffic studies performed today use a 2035 long range traffic forecast, it may be necessary for Urban Crossroads to address this issue before it is raised by others.

URBAN CROSSROADS

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August 21, 2013

Mr. Eric Flodine
STRATA EQUITY GROUP
4370 La Jolla Village Drive, Suite 960
San Diego, CA 92122

Subject: **Response to Comments by Bob Davis from RBF Consulting, on July 22, 2013, regarding the Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review, prepared on June 12, 2013**

Dear Mr. Flodine:

The firm of Urban Crossroads, Inc. is pleased to submit the following responses to the comments provided by RBF Consulting, on July 22, 2013, regarding the Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review, prepared on June 12, 2013. The comment memorandum is provided in Attachment A of this letter.

Comment 1

We concur with the Urban Crossroads finding concerning the" Project Description" and "Environmental Regulations."

Response to Comment 1

Comment noted.

Comment 2

We concur that potential changes in the environmental setting for the traffic analysis could occur in two primary areas including the roadway system and the existing traffic volume using the existing roadway system and/or the projected volumes using the roadway system.

Response to Comment 2

Comment noted.

Comment 3

We concur that it was necessary to update the inventory of the existing roadway system characteristics and to identify recent roadway and intersection improvements. While the improvements clearly provide additional roadway capacity, we do not agree that the conclusion made by Urban Crossroads that the impacts identified in the published environmental document are more conservative since the analysis assumes that improvements are not in place yet. This would only be valid if the existing traffic volumes have not increased in a manner that would offset the increase in capacity. If it can be demonstrated that traffic has not increased significantly at these locations, then the finding could be made that the original

analysis was more conservative. I suggest that Urban Crossroads move their conclusion discussion to the end of the section after the discussion of changes in existing traffic volumes.

Response to Comment 3

An EIR's evaluation of environmental impacts should normally measure the changes a project will make in physical conditions in the area affected by the project as they exist when the notice of preparation is published. (State CEQA Guidelines, § 15126.2(a); *Communities for a Better Env't v. South Coast Air Quality Mgmt. Dist*. (2010) 48 Cal.4th 310, 320.) Although recent case law supports the use of a future baseline for the assessment of environmental impacts, such a baseline is appropriate only if some unusual aspect of the project at issue or the surrounding circumstances justifies the use of the future baseline. No such unusual circumstances or conditions are present here. Therefore, reference to the conditions at the time the NOP was published, here, is the baseline against which the environmental impacts of the Project were assessed. With the addition of the improvements in the interim, the EIR therefore offers a conservative analysis of the Project's traffic impacts as it does not account for these improvements, but rather assumes the maximum traffic impacts resulting from the Project. Furthermore, although updated traffic data was not required, updated traffic data was provided in 2011 and included in a memorandum to the County. The memorandum confirms the adequacy of the EIR's analysis in light of the current traffic data and improvements.

Comment 4

The findings regarding the comparison of traffic volumes on SR-18 are helpful in showing a decrease in volume between 2007 and 2011; however, it raises the question of how the volume has changed between 2011 and 2013. Within the last year or two the economy has shown signs of improvement and may have resulted in an increase in traffic. I would strongly suggest that current traffic counts be taken on SR-18 to confirm and bolster this argument.

Response to Comment 4

Please see the response to Comment #3.

Comment 5

Similar to Comment #4, I would strongly suggest that additional traffic counts be taken in the area including some select roadway segments and at intersections that will carry the highest project-related traffic volumes. Traffic counts could also be taken at the intersection where capacity improvements were noted. With the updated counts, Urban Crossroads would be able to analyze the data and make a much more defensible conclusion.

Response to Comment 5

Please see the response to Comment #3.

Comment 6

Another comparison that could be made is related to "Other Planned Development." It may be helpful to review the list of other planned area development that was identified in the Traffic Impact Analysis." If it can be shown that very few of the projects have been built or if it can be shown that area traffic volume

has decreased even though some of the projects have been built, this would help demonstrate that conditions are similar to what was assumed in the traffic study.

Response to Comment 6

Similar to the response to Comment #3, the list of planned area development was developed in cooperation with County of San Bernardino and other local agency staff at (or around) the time of publication of the project environmental document NOP. This is the appropriate time frame as defined by CEQA and the CEQA guidelines. Also, the analysis in the report utilized the most current available data from the California Department of Transportation (CALTRANS) to reach the exact conclusion suggested in the comment (that area traffic volume has decreased). CALTRANS traffic count data is typically not available until 1-1/2 to 2 years later, which is why data from 2011 (the most current available data) was used in the analysis.

Comment 7
Since most traffic studies performed today use a 2035 long range traffic forecast, it may be necessary for Urban Crossroads to address this issue before it is raised by others.

Response to Comment 7

As with the previous comments, the suggestion that 2035 long range traffic forecasts be used is inconsistent with the requirements of CEQA and the CEQA guidelines that state that the environmental analysis should be based on baseline conditions as they stand at the time of the publication of the NOP. Only 2030 conditions data was available at this time. Therefore, no additional analysis is required by CEQA.

CLOSING

Urban Crossings, Inc. is pleased to provide this response letter for your use. If you have any questions regarding the information provided, please call me at (949) 660-1994, ext. 210.

Sincerely,

URBAN CROSSROADS, INC.

Carleton Waters, P.E.
Principal

CW:rd

JN:04946-45 Response to Comments.doc

Attachments

ATTACHMENT A

RBF Consulting Comment Memorandum, July 22, 2013

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MEMORANDUM

To: Kari Cano – RBF Consulting

From: Bob Davis – RBF Consulting

Date: July 22, 2013

Subject: Peer Review of *Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review*

As requested, we have completed our peer review of the *Hacienda at Fairview Valley Specific Plan Traffic Analysis Adequacy Review prepared by Urban Crossroads, June 12, 2013*, and offer the following comments and suggestions:

1. We concur with the Urban Crossroads finding concerning the" Project Description" and "Environmental Regulations."

2. We concur that potential changes in the environmental setting for the traffic analysis could occur in two primary areas including the roadway system and the existing traffic volume using the existing roadway system and/or the projected volumes using the roadway system.

3. We concur that it was necessary to update the inventory of the existing roadway system characteristics and to identify recent roadway and intersection improvements. While the improvements clearly provide additional roadway capacity, we do not agree that the conclusion made by Urban Crossroads that the impacts identified in the published environmental document are more conservative since the analysis assumes that improvements are not in place yet. This would only be valid if the existing traffic volumes have not increased in a manner that would offset the increase in capacity. If it can be demonstrated that traffic has not increased significantly at these locations, then the finding could be made that the original analysis was more conservative. I suggest that Urban Crossroads move their conclusion discussion to the end of the section after the discussion of changes in existing traffic volumes.

4. The findings regarding the comparison of traffic volumes on SR-18 are helpful in showing a decrease in volume between 2007 and 2011; however, it raises the question of how the volume has changed between 2011 and 2013. Within the last year or two the economy has

shown signs of improvement and may have resulted in an increase in traffic. I would strongly suggest that current traffic counts be taken on SR-18 to confirm and bolster this argument.

5. Similar to Comment #4, I would strongly suggest that additional traffic counts be taken in the area including some select roadway segments and at intersections that will carry the highest project-related traffic volumes. Traffic counts could also be taken at the intersection where capacity improvements were noted. With the updated counts, Urban Crossroads would be able to analyze the data and make a much more defensible conclusion.

6. Another comparison that could be made is related to "Other Planned Development." It may be helpful to review the list of other planned area development that was identified in the Traffic Impact Analysis." If it can be shown that very few of the projects have been built or if it can be shown that area traffic volume has decreased even though some of the projects have been built, this would help demonstrate that conditions are similar to what was assumed in the traffic study.

7. Since most traffic studies performed today use a 2035 long range traffic forecast, it may be necessary for Urban Crossroads to address this issue before it is raised by others.