



August 16, 2024

Chuck Beatty
Amador County Planning Director
810 Court Street
Jackson, CA 95642
(planning@amadorgov.org)

SENT: VIA EMAIL

RE: Wicklow Way Specific Plan Draft Environmental Impact Report

Dear Mr. Beatty,

The Amador County Transportation Commission (ACTC) appreciates the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Wicklow Way Specific Plan (WWSP). The ACTC understands that this effort by the County to initiate the Specific Plan process on this County-owned property allows an opportunity for prospective investors to obtain pre-approved environmental clearances and development guidelines.

The DEIR identifies potential impacts were a project to be developed pursuant to the land use designations described within the WWSP. The DEIR also includes reasonable mitigation measures designed to minimize environmental impacts. The Final EIR would approve those mitigation measures as entitlement conditions to be included in all potential applicant(s) project proposals.

The following are ACTC's comments on the DEIR.

- ACTC recommends that the County make clear the requirement for a prospective project proponent to pay mitigation fees into the Regional Traffic Mitigation Fee program pursuant to its approved fee schedule.
- As stated on page 4.14-14, "as conditions of approval for individual developments with the Project area", applicants will be required to pay a fair share contribution to the following improvements:
 - Wicklow Way at SR 88 – Installation of a traffic signal ...
 - Wicklow Way at the Main Walmart Entrance – Installation of a traffic signal"
- ACTC supports these mitigation measure requirements.



- At the intersection of the proposed Wicklow Way Extension to Stony Creek, the DEIR concludes on Page 4.14-12 that a “Side Street Stop” configuration will result in LOS “B” with an estimated 11.5 second delay.
 - The DEIR may be underestimating the functionality of the Wicklow Way Extension as a ‘bypass’ route shifting traffic from SR 88. In particular, the proposed plans calling for a consolidated high school at the current Argonaut High location may see a considerable travel demand from students travelling from the Ione and Sutter Creek directions. The DEIR should condition individual development approvals with ‘fair share’ contributions at this location to ensure the intersection configuration adequately addresses traffic safety.

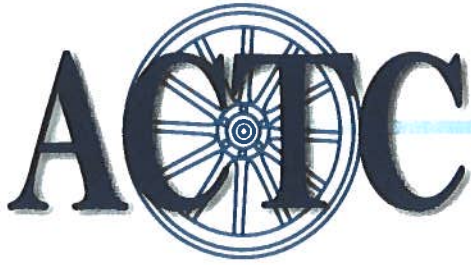
While Vehicle Miles Travelled (VMT) has replaced Level of Service (LOS) as the appropriate traffic impact analysis for California Environmental Quality Act (CEQA) compliance, Public Resources Code section 21099(b)(3), added to CEQA as part of Senate Bill 743 which established VMT, expressly provides:

This subdivision [establishing VMT as the metric to study traffic impacts] does not relieve a public agency of the requirement to analyze a project’s potentially significant transportation impact related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.

In short, a public agency remains expressly required to continue to analyze safety impacts independent of VMT and a public agency is expressly prohibited from relying exclusively on VMT to side step analysis of, among other things, impacts to traffic safety.

Conducting traffic safety analysis is important since:

- a project’s impacts may lengthen the queues at an intersection to the point where queues may extend past the existing turn pockets, the line of queued vehicles will spill over into the travel lanes. Having stationary, queued vehicles on a roadway where traffic typically moves at 45 mph would greatly heighten the risk of rear-end collisions.
- Drivers get impatient when waiting in long queues, and are more likely to engage in risky behavior as a result. This includes turning into gaps in the opposing traffic that the driver might otherwise reject as insufficient, crossing the centerline (i.e., into the opposing direction of travel) to cut the queue to the left, or driving onto the shoulder to cut the queue to the right.



It is not enough for the County to condition an applicant to pay its 'fair share' toward improvements. What Section 21099(b)(3) requires is for the County to analyze traffic safety impacts to ensure appropriate mitigation measures are in place to address opening day impacts. To address impacts as development projects proceed (however incrementally), traffic safety impact thresholds must be identified. These impact threshold 'trigger' points clearly enumerate timeframes for implementation of appropriate mitigation improvements. For these specific improvements then, 'fair share' financial contributions and construction implementation responsibilities must be clearly identified.

To adequately study traffic safety, the County must undertake Traffic Queueing analysis. (The Highway Capacity Software analysis included in Appendix F does not adequately study queueing.) The queue analysis, at a minimum, needs to provide the following:

- Existing turning movement traffic counts
- Trip generation and trip distribution of the proposed project
- Synchro/SimTraffic analysis

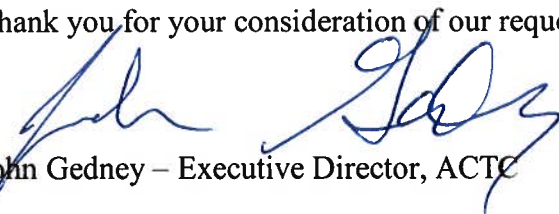
Additionally, the proposed design for Wicklow Way within the proposed development plan calls for single 14' travel lanes in each direction along with preservation of Right-of-Way (ROW) for median, greenway, and class I bikeway/pedestrian spaces. Due to the maximum allowable buildout of the Specific Plan, the functionality of the Wicklow Way Extension as a 'bypass' of SR 88, the future plans for the consolidation of Argonaut High School, along with continuing concerns with fire safety and evacuation route planning, the WWSP and DEIR should preserve additional ROW along the proposed Wicklow Way extension corridor for transportation-related purposes, including the potential for an additional thru travel lane.

Finally, the WWSP mitigation plan does not discuss the potential Sutter Street Extension Project as it relates to the Wicklow Way Extension and its potential to function as a 'bypass' of SR 88 relieving regional traffic impacts.

Given that the WWSP does not yet have an applicant to pursue a project, the above-detailed traffic safety study requirements may be deferred until such time as an applicant comes forward with a development proposal within the parameters of the Specific Plan. We recommend the County amend the DEIR mitigation measures to include this additional Traffic Safety Analysis as a future condition of project approval.

We hope the County will consider the issues raised in this comment letter and will incorporate meaningful analysis and mitigation measures into the final EIR.

Thank you for your consideration of our request.



John Gedney – Executive Director, ACTC