

To: Director Tennis Wick
CC: Dean Parsons, Jennifer Barrett, Planning Commissioner
County Transportation and Public Works

RE: PLP 14-0031 4603 Westside Road

The Transportation Department's (TPW) response did not answer our questions about compliance with the significance threshold and mitigations required for Discretionary Use Permit projects per the *Sonoma County Guidelines for Traffic Impact Studies*. A significant road safety impact exists, yet adequate measures to meet the thresholds have not been identified.

The TPW May 10th response stated that their practice is "to apply the AASHTO stopping sight distance values as the minimum sight distance requirement to private rural driveways..." This practice raises three serious issues:

1. Conflicts with *Sonoma County Guidelines for Traffic Studies* and totally ignores the safety issues associated with left turning movements;
2. Implies that a commercial project with 200 – 400 trips/ day is viewed as having the same safety impacts as a residential private driveway; and
3. Is inconsistent with recent Traffic Impact Studies.

First: As required by Section 6 of *Sonoma County Guidelines for Traffic Impact Studies*, projects requiring traffic impact studies must meet 11 thresholds of significance. This letter only refers to threshold 9) Sight Lines, although other Road Safety thresholds apply. The County document states:

"A project would have a significant traffic impact if it results in any of the following conditions:

9. Sight Lines: The project constructs an unsignalized **intersection (including driveways)** and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based on Caltrans criteria for state highway intersections and AASHTO criteria for County **roadway intersections**." (Emphasis added)

The plain reading of threshold 9 is that traffic impact study projects require the use of AASHTO criteria for County **roadway intersections**. Inclusion of the reference to driveways in this provision was to ensure that access to a project requiring a traffic analysis would be treated as an intersection, not simply as a driveway to a residence. This includes addressing left turning movements without on-coming traffic having to alter speed significantly.

Second: Any reasonable person would conclude that a project access road for a commercial use projected to generate from 186 to 274 new trips daily plus up to 400 turning movements on large event days is NOT a private driveway.

In a June 2014 memo, TWP stated, "North of the driveway, sight distance is substandard and can't be improved due to road geometry." This project provides access to the public, and sight distances must accommodate a significant number of vehicles, including turning movements by large, slow moving trucks entering or existing the project. Truck turning movements were not analyzed.

A Discretionary Use Permit project requesting significant public access with minimal stopping distance around a blind curve poses a far greater risk of accidents than merely a private driveway.

Our 3rd issue is the discrepancy between the TPW stated practice and recent traffic impact studies.

Although the 2014 traffic study inverted the left and right turn sight distances, it did base the analysis on AASHTO sight distance criteria for roadway intersections. Given the standard is 335 feet looking left and 290 feet looking right at 30 mph, the project could not meet the County standards for roadway intersections. The write-up considered the time to safely execute a left hand turn for assumed speed of 30 mph and discussed broadside and rear end accidents.

For the Belden Barns project, a different traffic-engineering firm performed the traffic study for this Discretionary Use Permit project consistent with the *Guidelines for Traffic Impact Analysis* threshold standards. This project is expected to generate only about one-third the daily trips projected for 4603 Westside. Although the analyses discussed prevailing speed and stopping distances, mitigation measures were included to meet AASHTO safe sight distances for roadway intersections. To meet the threshold of reducing the impact to less than significant at AASHTO standards for 40 mph, a mitigation was included to create safe sight distances: "The project would include vegetation removal to provide 445 feet of sight distance to the east and 385 feet of sight distance to the west..."

Unlike the Belden Barns study and previous 4603 Westside study, the 2016 Traffic Report removed all discussion of compliance with AASHTO intersection left turn and right turn criteria, which is neither appropriate nor consistent with the County's requirements for a roadway with up to 400 turning movements per day.

The May 2016 Traffic Report stated that the southbound 85th percentile "prevailing speed" was calculated at 35 mph, which requires a safe sight distance of around 390 feet. The 2016 study merely recommended moving the access road 20 feet to the south, with is inadequate to address intersection criteria for sight distance as required by the *Sonoma County Guidelines of Traffic Impact Studies*. The analyses merely rely on an exception to use minimum stopping distances for private driveways,

Road safety is a primary responsibility of the County, and for the public to have confidence that project decisions are based on accurate, verified studies, the County must explain the rationale for variances to its safety standards in cases where sharp curves and substandard road geometry exist. At a minimum, the discrepancies

between the two studies for this project, and lack of mitigation to meet the AASHTO thresholds for intersections as was done for the Belden Barns project must be addressed.

In addition, joint road use conflicts with large trucks and bicycles were not addressed at all. Westside Road is a heavily used bicycle route with a bicycle LOS E. The April 2017 Level of Service Analysis shows that Westside is already at Level of Service C, with at least three (3) known projects in addition to the subject project, the Level of Service Analysis should address cumulative impacts of existing and known projects.

Marc Bommersbach

From: Marc Bommersbach mbommersbach@att.net

Subject: Fw: 4603 Westside PLP14-0031

Date: May 8, 2017 at 4:29 PM

To: Judith Olney milestonesmet@gmail.com, Jim Dreisback jmdreisback@yahoo.com, William Fumich wmfumichjr@sbcglobal.net, McColgin - Meldau mmranch1@att.net

----- Forwarded Message -----

From: Marc Bommersbach <mbommersbach@att.net>

To: Dean Parsons <dean.parsons@sonoma-county.org>

Cc: Gary Broad <garybroad@comcast.net>

Sent: Monday, May 8, 2017 4:27 PM

Subject: 4603 Westside PLP14-0031

Dean,

After reviewing the MND for PLP14-0031 and the W-Trans May 11, 2016 traffic impact study, there is a significant traffic and road safety impact that cannot be mitigated related to sight distance for the proposed winery project.

The Sonoma County Department of Transportation in its May 2016 *Guidelines for Traffic Impact Studies Section VI Thresholds* (page 10-11) states:

"A project would have a significant traffic impact if it results in any of the following conditions:

9. Sight Lines: The project constructs an unsignalized intersection (including driveways) and/or adds traffic to an existing unsignalized intersection approach that does not have adequate sight lines based on Caltrans criteria for State highway intersections and AASHTO criteria for County roadway intersections."

Instead of using the AASHTO safe sight distances criteria as used in other winery use permits, the W-Trans 2016 study used **stopping distance** as the criteria, which they stated as 250 feet for a car traveling 35 mph. Looking left from the project access road (north), the AASHTO criteria for safe sight distances requires 335 feet for 30 mph and 445 feet for 40 mph. The W-Trans study states a sight line measurement of only 310 feet to the left.

W-Trans measurements indicates insufficient sight line to the left, creating a significant traffic impact under the County's DTPW guidelines.

Also, the October 8, 2015 WCA letter questions the accuracy of the 310 distance measurements in the W-Trans study.

In addition, the W-Trans study did not address the DTPW comments relative to substandard sight distance that cannot be improved due to road geometry.

Attached are the relevant pages from the May 16 Guidelines for Traffic Impact Studies and the AASHTO the Driveway Access Management Standards, and relative memos from the DTPW.

This is a serious deficiency that cannot be mitigated given the road configuration in the vicinity of the project.

Given the serious safety implication of this discrepancy, and that there is a hearing scheduled for June 1, it is imperative that this issue gets resolved immediately.

We are requesting a written explanation from the DTPW that demonstrates mitigations able to create safe sight distances at the project's entrance.

Marc