

# **EXHIBIT F**



January 5, 2017

Ms. Christina Caro  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080-7037

**Subject: Suncrest Dynamic Reactive Power Support Project DEIR**

Dear Ms. Caro:

Per your request, I reviewed Draft Environmental Impact Report (the "DEIR") for the Suncrest Dynamic Reactive Power Support Project (the "Project") in San Diego County (the "County"). My review is with respect to transportation and circulation considerations.

My qualifications to perform this review include registration as a Civil and Traffic Engineer in California and over 48 years professional consulting engineering practice in the traffic and parking field. I have both prepared and reviewed the transportation and circulation sections of environmental review documents. My professional resume is attached hereto. Technical comments follow:

**The Illustration of the Project in the Transportation and Traffic Chapter of the DEIR (Figure 19-1) Lacks Critical Details**

DEIR Figure 19-1 entitled "*Roadways in the Project Vicinity*" lacks critical details. It does not show the location of the gate that divides the portion of Bell Bluff Truck Trail to which the public has access from the portion to which access is restricted. Figure 19-1 also fails to show the locations of driveways to private residences accessed from Bell Bluff Truck Trail or Avenida de los Arboles, and does not show sufficient detail of the roadway network to disclose the fact that these residences have no alternate access routes. The text of the DEIR similarly fails to disclose the exact locations of residence access. These deficiencies render the DEIR inadequate as an informational document because the DEIR

fails to set forth the baseline residential access conditions that will be impacted by the Project.

### **Baseline Traffic Count and Residential Data is Deficient**

The DEIR presents no traffic data for Bell Bluff Truck Trail or Avenida de los Arboles, instead stating that "no traffic data are available". This statement demonstrates the DEIR's failure to collect the relevant data necessary to perform a meaningful analysis of traffic impacts, resulting in an overall lack of informed analysis in the DEIR. Construction impacts on traffic utilizing these roads is at the essence of why a traffic impact study is being performed as part of the DEIR. It is therefore incumbent upon the preparing agency to obtain accurate data on the traffic using the roads that will be impacted by the Project. If no current data is available from the public agencies that ordinarily maintain traffic count records, then due diligence requires that the lead agency retain a traffic counting service to make the counts necessary to support the DEIR's analysis. The DEIR's failure to include this threshold information regarding existing traffic in the Project area fails to comply with the information disclosure requirements of CEQA and renders the DEIR's conclusions unsupportable.

The DEIR also improperly relies on outdated 2008 traffic counts on Japatul Valley Road. The DEIR acknowledges that the Japatul counts are outdated, but erroneously contends that reliance on the 2008 counts is nevertheless remedied by citation to more recent 2009 and 2013 counts taken on other roads located several miles away from the Project's roads of concern, and which are therefore irrelevant to the DEIR's analysis of current conditions on Japatul Valley Road. The DEIR's traffic analysis should be revised to include current traffic counts on all roads relevant to the Project, including Japatul Valley Road. The lack of current traffic count data makes the DEIR deficient as an informational document under CEQA.

Finally, the traffic analysis also fails to disclose the number of residences that would have their traffic access and egress potentially disrupted by the Project's construction traffic. This information is fundamental to the DEIR's impact analysis. Its omission makes it impossible to reach an informed conclusion about the severity of the Project's construction traffic impacts.

### **The DEIR Traffic Analysis Understates the Amount of Construction Traffic**

The DEIR discloses that approximately 4030 cubic yards of excavated materials would need to be hauled from the site. The DEIR concludes that, over a 220-day construction period, this would only involve an average of 2 trips per day by trucks with a 10 cubic yard capacity. However, the DEIR's analysis ignores the fact that each load involves both a truck trip in and a truck trip out (in other words 2 loads means 4 total truck trips) and assumes the unlikely fact that excavation

and related hauling would take place evenly over every day of the 220-day construction period. There is no evidence in the DEIR's traffic analysis to support this assertion. Rather, the construction schedule described in the DEIR indicates that excavation, grading, and hauling activities are only likely to take place during the first 6.5 months of the 11-month construction period, whereas activities such as "testing and commissioning" and "restoration and cleanup" will occupy the remaining 4.5 months. See DEIR, p. ES-5 to 6.

The DEIR's traffic analysis also fails to account for bulking - the swell of excavated materials to a greater size than the size of the hole or holes that was or were dug. The amount of bulking depends on the material excavated. For instance, ordinary soil or dry gravel swells to a volume 20 to 30 percent greater than the size of the excavation; dolomite swells to a 50 to 60 percent greater volume than the hole; limestone and sandstone swell to volumes 75 to 80 percent greater than the size of the hole<sup>1</sup>. Since the DEIR discloses that some of the excavation might involve blasting, it is likely that much of the material hauled away will be rock materials that involve the highest swell factors. As a result, hauling activity would likely be much more intense on those days than disclosed in the DEIR. The DEIR also opines that the number of haul trips could be cut in half by using 20 cubic yard trucks instead of 10 cubic yard ones. However, this conclusion is unsupported and ignores the fact that such a substitution is improbable because of the difficulty of maneuvering the larger trucks on the subject roadways, particularly where Bell Bluff Truck Trail will be significantly narrowed by the excavation itself.

The DEIR discloses that a maximum of 64 workers would be on site during the construction period but claims that "*Typically, construction workers travel together to the work site*" and "*Even if each worker drove his or her own vehicle and traveled alone, based on the anticipated number of workers...the additional vehicle trips generated by construction would be negligible considering the average daily traffic and existing LOS on I-8 and local roadways*". These statements are unsupported and problematic on a number of levels. First, there is no evidence presented in the DEIR to support the conclusion that construction workers travel together. Rather, construction workers are widely recognized by traffic professionals as notorious solo commuters because they often carry personally owned tools with them in their vehicles to the work site. Second, even assuming (without evidence) that construction worker trips were minimal, the DEIR lacks evidence to conclude that construction vehicle trips would be negligible, and therefore have a less than significant impact, when compared to average daily traffic and existing LOS since the DEIR never measured existing daily traffic or related LOS. Finally, the DEIR fails to address the impacts of Project construction on local neighborhoods by failing to disclose that Project

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<sup>1</sup> For more extended information on bulking and swell of excavated materials see [www.engineeringtoolbox.com/soil-rock-bulking-factor-d\\_1557.html](http://www.engineeringtoolbox.com/soil-rock-bulking-factor-d_1557.html) .

construction traffic is likely to result in significant or complete blockage of access roads, and general disturbance of use and access to residences, located along Bell Bluff Truck Trail. The DEIR fails to analyze the impacts of this traffic obstruction in the local neighborhoods surrounding the Project site which depend entirely on the Trail for access, and the corollary impacts caused by obstructing emergency vehicle access to these residences.

In particular, the DEIR fails to address the following issues:

- **Construction Parking:** Will all of the construction workers be able to park within the "secured" portion of Bell Bluff Truck Trail, or will they be parking to the east of that area where they will be more visible and objectionable to neighbors?
- **Presence of Construction Vehicles in Residential Neighborhood:** Will heavy vehicles bringing construction equipment and supplies to the site be staged within the "secured" portion of Bell Bluff Truck Trail or will they be outside it where they will be more disruptive to the neighborhood?
- **Blocking Residential and Emergency Access:** Will residential driveways and emergency vehicle access be blocked by inappropriately parked construction worker vehicles or idling haul vehicles occupying the narrow Trail?

The DEIR should be revised to address these fundamental traffic-related issues.

### **Purported Mitigation Measures Are Ineffective**

Mitigation Measure TR-1: Maintain Traffic Flow states as follows:

*NEET West or their contractor(s) shall implement the following measures:*

- *To the extent feasible, work shall be staged and conducted in a manner that maintains two-way traffic flow on roadways in the vicinity of the work site.*
- *Heavy equipment and haul traffic shall be prohibited in residential areas to the greatest extent feasible. When no other route to and from the site is available, heavy equipment and haul traffic through residential areas shall be restricted to the hours of 8 a.m. to 5:30 p.m., Monday through Friday.*

This measure is infeasible, and not likely to be implemented in any meaningful way, because the only access to the Project site is via a single access road which passes through a residential neighborhood. It is therefore impossible for heavy equipment and haul traffic to be "prohibited in residential areas" as the Measure suggests, unless such equipment is eliminated from the Project altogether. Additionally, inclusion of the phrases "*to the extent feasible*" and "*to*

*the greatest extent feasible*" gut the effectiveness of the mitigation measure because they do not require any action if the developer decides it is "infeasible" to perform the required tasks.

Mitigation actions that would be helpful to the neighborhood, and which should be specifically defined in the measure, include requiring all worker vehicle parking to take place within the secured portion of Bell Bluff Truck Trail, and for all staging of heavy equipment and haul traffic to also take place within the same secured portion of Bell Bluff Truck Trail, thus avoiding substantial interference with residential access and use.

Mitigation Measure TR – 2: Minimize Effects of Temporary Roadway Disturbances states as follows:

- NEET West or their contractor(s) shall implement the following Measures:*
- *Prepare and implement a Traffic Control Plan (TCP) to describe procedures to guide traffic (such as signage and flaggers, safeguard construction workers, provide safe passage of traffic and minimize traffic impacts, as necessary, through the duration of construction. In the event that closure of any portion of Bell Bluff Truck Trail were to become necessary, notification shall be provided to SDG&E at least 5 days in advance of anticipated closures. In the event that road closure were to become necessary for any publicly-accessible road segment, notification shall be posted and/or circulated to the public at least 5 days in advance of the anticipated closure. NEET West shall employ adequate control devices, signage, a detour route and flaggers, as necessary, throughout the duration of the construction.*

Given that the Project site's sole access is via residential streets that also serve as the sole access to residential neighborhoods, compliance with the mitigation measure is infeasible, rendering the measure ineffective. First, there are no possible "detour routes" since the Project site may only be accessed by Bell Bluff Truck Trail and its extension, Avenida de los Arboles. Second, the DEIR fails to analyze, and the Mitigation Measure fails to mitigate, the impacts that complete road closure would have on either SD&E or local residents, given the fact that there are no alternative access routes available. For example, if a resident was scheduled to have a large wedding party (or similar social function) in their home and yard, 5 days advanced notice of a complete road closure blocking access to their home would be inadequate to mitigate the harm to the residents. Similarly, if an emergency vehicle were required to respond to an emergency along Bell Bluff Truck Trail or Avenida de los Arboles during a Project-related road closure, the emergency vehicle would have no alternate means of access to residences located along those roads. This could result in unabated fire or crime, failure of

an ambulance to timely respond to a health emergency, etc. These are significant impacts that the Mitigation Measure entirely fails to address or mitigate.

In order to be effective, this Mitigation Measure should instead require that no road closure may occupy more than the half-width of the publicly accessible portions of Bell Bluff Truck Trail or Avenida de los Arboles, and that the remaining half-width will be maintained accessible to two-way traffic by alternating one-way movements controlled by radio-equipped flaggers.

Mitigation Measure TR-3 Emergency Coordination And Access Considerations states as follows:

*NEET West or their contractor(s) shall implement the following measures:*

- *When work is conducted on roads and may have the potential to affect traffic flow, work shall be coordinated with local emergency service providers, as necessary, to ensure that emergency vehicle access and response is not impeded.*
- *Access for driveways and private roads shall be maintained to the extent feasible. If brief periods of construction work would temporarily block access, property owners shall be notified prior to construction activities.*
- *If closure of any portion of Bell Bluff Truck Trail is necessary during Project Construction, NEET West shall have staff available on-site at all times to place plates over open trenches, move construction equipment or clear any other obstructions to allow for 24 hour emergency vehicle access to SDG&E facilities.*

As discussed above, any complete road closure on Bell Bluff Truck Trail will impede emergency vehicle access. It logically follows that, if Project construction work is blocking traffic flow on a sole access road, a measure requiring that "work shall be coordinated with local emergency service providers to ensure that emergency vehicle access and response is not impeded" would have no practical effect, and would not mitigate this impact. It is also insufficient to have crews in place to allow for 24-hour emergency vehicle access solely to SDG&E facilities. The same should apply for any residential driveway or private roadway that might be temporarily obstructed. The Mitigation Measure should also define what is the acceptable duration for "brief periods of construction work that would temporarily block" driveway and private road access.

The DEIR's traffic mitigation measures must be revised to focus on protecting the safety and reasonable access needs of the residences that take their sole access via Bell Bluff Truck Trail and/or Avenida de los Arboles.

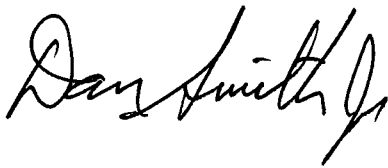
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## Conclusion

This completes my current comments on the Suncrest Dynamic Reactive Power Support Project DEIR. The DEIR's traffic impact study omits basic information that is critical to the public's analysis of the Project's traffic impacts, and fails to provide effective mitigation for admittedly significant traffic impacts. The DEIR's traffic analysis should be revised to include all relevant, missing information and recirculated in draft status.

Sincerely,

Smith Engineering & Management  
A California Corporation



Daniel T. Smith Jr., P.E.  
President





SMITH ENGINEERING & MANAGEMENT

**DANIEL T. SMITH, Jr.**  
**President**

**EDUCATION**

Bachelor of Science, Engineering and Applied Science, Yale University, 1967  
Master of Science, Transportation Planning, University of California, Berkeley, 1968

**PROFESSIONAL REGISTRATION**

California No. 21913 (Civil)                      Nevada No. 7969 (Civil)    Washington No. 29337 (Civil)  
California No. 938 (Traffic)                      Arizona No. 22131 (Civil)

**PROFESSIONAL EXPERIENCE**

Smith Engineering & Management, 1993 to present, President.  
DKS Associates, 1979 to 1993. Founder, Vice President, Principal Transportation Engineer.  
De Leuw, Cather & Company, 1968 to 1979. Senior Transportation Planner.  
Personal specialties and project experience include:

**Litigation Consulting.** Provides consultation, investigations and expert witness testimony in highway design, transit design and traffic engineering matters including condemnations involving transportation access issues; traffic accidents involving highway design or traffic engineering factors; land use and development matters involving access and transportation impacts; parking and other traffic and transportation matters.

**Urban Corridor Studies/Alternatives Analysis.** Principal-in-charge for State Route (SR) 102 Feasibility Study, a 35-mile freeway alignment study north of Sacramento. Consultant on I-280 Interstate Transfer Concept Program, San Francisco, an AA/EIS for completion of I-280, demolition of Embarcadero freeway, substitute light rail and commuter rail projects. Principal-in-charge, SR 238 corridor freeway/expressway design/environmental study, Hayward (Calif.) Project manager, Sacramento Northeast Area multi-modal transportation corridor study. Transportation planner for I-80N West Terminal Study, and Harbor Drive Traffic Study, Portland, Oregon. Project manager for design of surface segment of Woodward Corridor LRT, Detroit, Michigan. Directed staff on I-80 National Strategic Corridor Study (Sacramento-San Francisco), US 101-Sonoma freeway operations study, SR 92 freeway operations study, I-880 freeway operations study, SR 152 alignment studies, Sacramento RTD light rail systems study, Tasman Corridor LRT AA/EIS, Fremont-Warm Springs BART extension plan/EIR, SRs 70/99 freeway alternatives study, and Richmond Parkway (SR 93) design study.

**Area Transportation Plans.** Principal-in charge for transportation element of City of Los Angeles General Plan Framework, shaping nations largest city two decades into 21<sup>st</sup> century. Project manager for the transportation element of 300-acre Mission Bay development in downtown San Francisco. Mission Bay involves 7 million gsf office/commercial space, 8,500 dwelling units, and community facilities. Transportation features include relocation of commuter rail station; extension of MUNI-Metro LRT; a multi-modal terminal for LRT, commuter rail and local bus; removal of a quarter mile elevated freeway; replacement by new ramps and a boulevard; an internal roadway network overcoming constraints imposed by an internal tidal basin; freeway structures and rail facilities; and concept plans for 20,000 structured parking spaces. Principal-in-charge for circulation plan to accommodate 9 million gsf of office/commercial growth in downtown Bellevue (Wash.). Principal-in-charge for 64 acre, 2 million gsf multi-use complex for FMC adjacent to San Jose International Airport. Project manager for transportation element of Sacramento Capitol Area Plan for the state governmental complex, and for Downtown Sacramento Redevelopment Plan. Project manager for Napa (Calif.) General Plan Circulation Element and Downtown Riverfront Redevelopment Plan, on parking program for downtown Walnut Creek, on downtown transportation plan for San Mateo and redevelopment plan for downtown Mountain View (Calif.), for traffic circulation and safety plans for California cities of Davis, Pleasant Hill and Hayward, and for Salem, Oregon.

**Transportation Centers.** Project manager for Daly City Intermodal Study which developed a \$7 million surface bus terminal, traffic access, parking and pedestrian circulation improvements at the Daly City BART station plus development of functional plans for a new BART station at Colma. Project manager for design of multi-modal terminal (commuter rail, light rail, bus) at Mission Bay, San Francisco. In Santa Clarita Long Range Transit Development Program, responsible for plan to relocate system's existing timed-transfer hub and development of three satellite transfer hubs. Performed airport ground transportation system evaluations for San Francisco International, Oakland International, Sea-Tac International, Oakland International, Los Angeles International, and San Diego Lindberg.

**Campus Transportation.** Campus transportation planning assignments for UC Davis, UC Berkeley, UC Santa Cruz and UC San Francisco Medical Center campuses; San Francisco State University; University of San Francisco; and the University of Alaska and others. Also developed master plans for institutional campuses including medical centers, headquarters complexes and research & development facilities.

**Special Event Facilities.** Evaluations and design studies for football/baseball stadiums, indoor sports arenas, horse and motor racing facilities, theme parks, fairgrounds and convention centers, ski complexes and destination resorts throughout western United States.

**Parking.** Parking programs and facilities for large area plans and individual sites including downtowns, special event facilities, university and institutional campuses and other large site developments; numerous parking feasibility and operations studies for parking structures and surface facilities; also, resident preferential parking .

**Transportation System Management & Traffic Restraint.** Project manager on FHWA program to develop techniques and guidelines for neighborhood street traffic limitation. Project manager for Berkeley, (Calif.), Neighborhood Traffic Study, pioneered application of traffic restraint techniques in the U.S. Developed residential traffic plans for Menlo Park, Santa Monica, Santa Cruz, Mill Valley, Oakland, Palo Alto, Piedmont, San Mateo County, Pasadena, Santa Ana and others. Participated in development of photo/radar speed enforcement device and experimented with speed humps. Co-author of Institute of Transportation Engineers reference publication on neighborhood traffic control.

**Bicycle Facilities.** Project manager to develop an FHWA manual for bicycle facility design and planning, on bikeway plans for Del Mar, (Calif.), the UC Davis and the City of Davis. Consultant to bikeway plans for Eugene, Oregon,

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Washington, D.C., Buffalo, New York, and Skokie, Illinois. Consultant to U.S. Bureau of Reclamation for development of hydraulically efficient, bicycle safe drainage inlets. Consultant on FHWA research on effective retrofits of undercrossing and overcrossing structures for bicyclists, pedestrians, and handicapped.

### **MEMBERSHIPS**

Institute of Transportation Engineers Transportation Research Board

### **PUBLICATIONS AND AWARDS**

*Residential Street Design and Traffic Control*, with W. Homburger et al. Prentice Hall, 1989. Co-recipient, Progressive Architecture Citation, *Mission Bay Master Plan*, with I.M. Pei WRT Associated, 1984. *Residential Traffic Management, State of the Art Report*, U.S. Department of Transportation, 1979. *Improving The Residential Street Environment*, with Donald Appleyard et al., U.S. Department of Transportation, 1979. *Strategic Concepts in Residential Neighborhood Traffic Control*, International Symposium on Traffic Control Systems, Berkeley, California, 1979. *Planning and Design of Bicycle Facilities: Pitfalls and New Directions*, Transportation Research Board, Research Record 570, 1976. Co-recipient, Progressive Architecture Award, *Livable Urban Streets, San Francisco Bay Area and London*, with Donald Appleyard, 1979.

**ATTACHMENT**