

California Department of Transportation

OFFICE OF THE DISTRICT 10 RURAL PLANNING
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August 15, 2024

Ms. Krista Ruesel, Planner
Amador County Planning Department
810 Court Street
Jackson, CA 95642

AMA-88-PM 15.25
Wicklow Way Specific Plan
(WWSP)
Draft Environmental Impact
Report (DEIR)
SCH 2023010563

Dear Ms. Ruesel,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the proposed Wicklow Way Specific Plan (WWSP) project. The WWSP establishes a development framework for land use, circulation, utilities and services, resource protection, and implementation. All subsequent development projects and related activities are required to be consistent with the WWSP.

The Plan is the primary land use, policy, and regulatory document used to guide overall development of the 201-acre County-owned site situated between Walmart and Argonaut High School, within the Martell Regional Service Center. The Plan would provide space for the following land uses:

A total of 700 residential units with a range of densities on approximately 80 acres that would accommodate approximately 1,800 residents:

- 26 acres for community commercial and civic uses
- 46 acres of open space
- 7 acres for parks and recreation
- 42 acres for public uses

The site is located one (1) mile west of the intersection of State Route (SR) 88 and SR 49, situated between Walmart and Argonaut High School within the Martell Regional Service Center in the City of Jackson on Assessor Parcel Numbers (APN) is 044-100-027.

Caltrans at this time has the following comments:

Environmental

If any physical construction activities encroach into the State Right-of-Way (ROW), the project proponent must apply for an Encroachment Permit with the Caltrans District 10 Encroachment Permit Office. They must submit all the required California Environmental Quality Act (CEQA) documentation, supporting technical studies, and their Encroachment Permit Application. These studies will analyze potential impacts to any cultural sites, historic properties, biological resources, hazardous waste locations, scenic highways, and/or other environmental resources within State ROW at the project site(s). Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents for approval of encroachment in the State ROW. If there are mature trees within and/or near State ROW that could provide a suitable nesting habitat. If work occurs between February 1 and September 30 of any year, a qualified biologist must conduct a pre-construction bird survey before the start of any construction-related activities within the State ROW.

A protective buffer must be established around the nest if an active nest is observed per California Department of Fish and Wildlife (CDFW) guidelines. No work is allowed within the protective buffer limits until the young have fledged and until authorized by the Caltrans District 10 Environmental Office. Results of the pre-construction bird survey(s) must be provided to the Caltrans District 10 Environmental Office prior to the start of construction. If there are impacts to protected water resources within State ROW, Caltrans will need to see the correspondence with the permitting authorities CDFW, United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQC) and/or be provided copies of any required permits prior to the start of any construction in State ROW.

The DEIR indicates there are potential affects to federally listed and proposed species/critical habitats. If there is encroachment into State ROW, evidence of Section 7 consultation or conferencing with the U.S. Fish & Wildlife Service and/or National Marine Fisheries Service must be submitted with the Encroachment Permit Application. In addition, the applicant must provide the National Environmental Policy Act (NEPA) document for review. The Encroachment Permit will not be approved until CEQA and National Environmental Policy Act (NEPA) compliance is demonstrated.

Hydrology

The proposed site development is adjacent to the state route. The developer needs to ensure that the Project will not significantly impact the existing State drainage facilities. If historical undeveloped topography shows, drainage from this site flowed

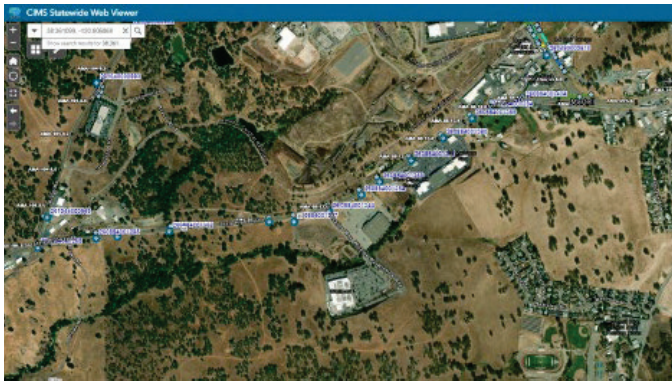
into the State ROW, it may continue to do so with the conditions that peak flows may not be increased from the pre-construction quantity and the site runoff be treated to meet present stormwater quality standards. If historical undeveloped topography shows drainage from this site did not flow into the State ROW, then it will not be allowed to flow into the State ROW.

As described in the preceding impact discussions, the proposed Project would alter the site's existing drainage pattern in several ways, most notably by adding impervious surface area with full buildout.

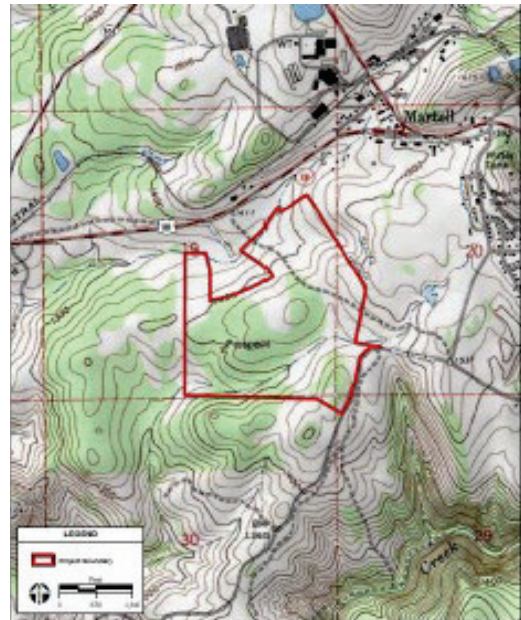
Each aspect of this significance criterion, with respect to construction, operation, and final, needs to be evaluated.

The supporting documents below, previously requested in our February 10, 2022, letter, have not been received. The comments below are still applicable. Additional review will be required once the project development plans, including but not limited to, Drainage and Grading Plans and drainage calculations are submitted.

- The proposed expansion on the parcels mentioned above has indicated an increase in the imperious (paved) and pervious (unpaved) stormwater runoff area. If historical undeveloped topography shows drainage from this site flowed into the State ROW, it may continue to do so with the conditions that peak flows may not be increased from the pre-construction quantity. Any increase in runoff generated by the proposed development should be stored/mitigated onsite.
- There are ten (10) existing State cross culverts within the proposed expansion vicinity (See attachment). Caltrans would not allow additional runoff draining into the State R/W nor significantly impact these existing drainage facilities or flow patterns.
- Caltrans would like to review the pre- and post-construction stormwater runoff calculations for two (2) 10-year/24-hour storm event and Drainage and Grading Plans showing the flow patterns. The applicant needs to ensure that the existing State drainage facilities will not be significantly impacted by the project. Additional review will be required once the project development plans, including but not limited to, Drainage and Grading Plans and drainage calculations are submitted.



**10 Impacted Caltrans Culverts
within the project limits**



Topographical Map



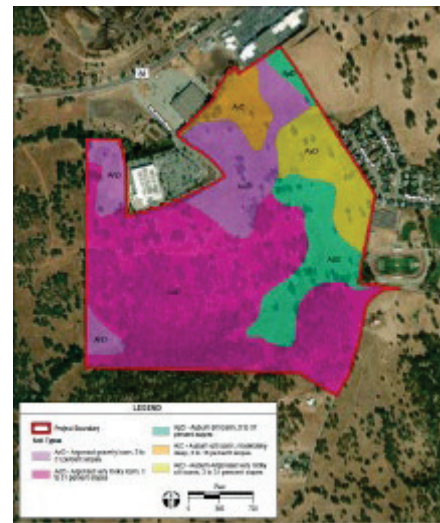
Project site and vicinity



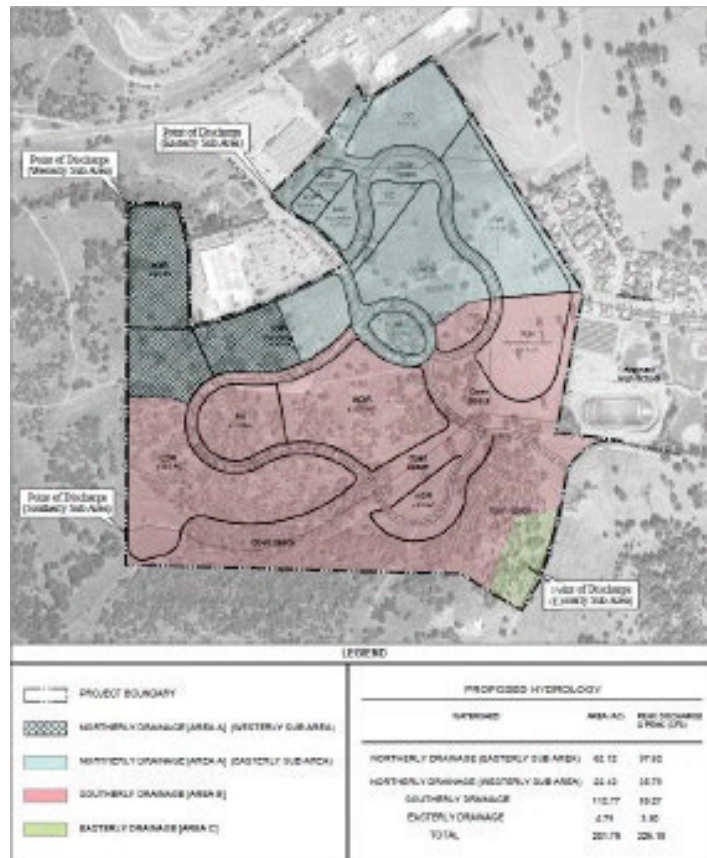
Specific Plan Land Use

LAND USE DESIGNATION	APPLIED ZONING DISTRICT	ACRES	% OF TOTAL ACRES	UNITS	% OF TOTAL UNITS
Residential					
LDK Low Density Residential	FD-R1	43.1	20%	280	40%
MDR Medium Density Residential	FD-R2	37.6	14%	220	31%
HDR High Density Residential	FD-R5	9.6	4%	200	29%
Subtotal		77.7	39%	700	100.0%
Commercial/Office					
CC Commercial	FD-CC	12.0	6%		
PQP Civic Center	PQP	12.4	6%		
Subtotal		24.4	12%		
Open Space and Public					
OS Open Space	OS	53.7	27%		
PR Parks and Recreation	PR	10.0	5%		
Subtotal		63.7	32%		
PQP					
Electric Substation	PQP	1.6			
Sewer Lift Station	PQP	1.6			
Fire Station	PQP	3.6			
Wastewater Treatment	PQP	9.3			
Elementary School	PQP	9.8			
Major Streets	PQP	13.9			
Subtotal		36.0	17%		
Total		201.8	100.0%	700	100.0%

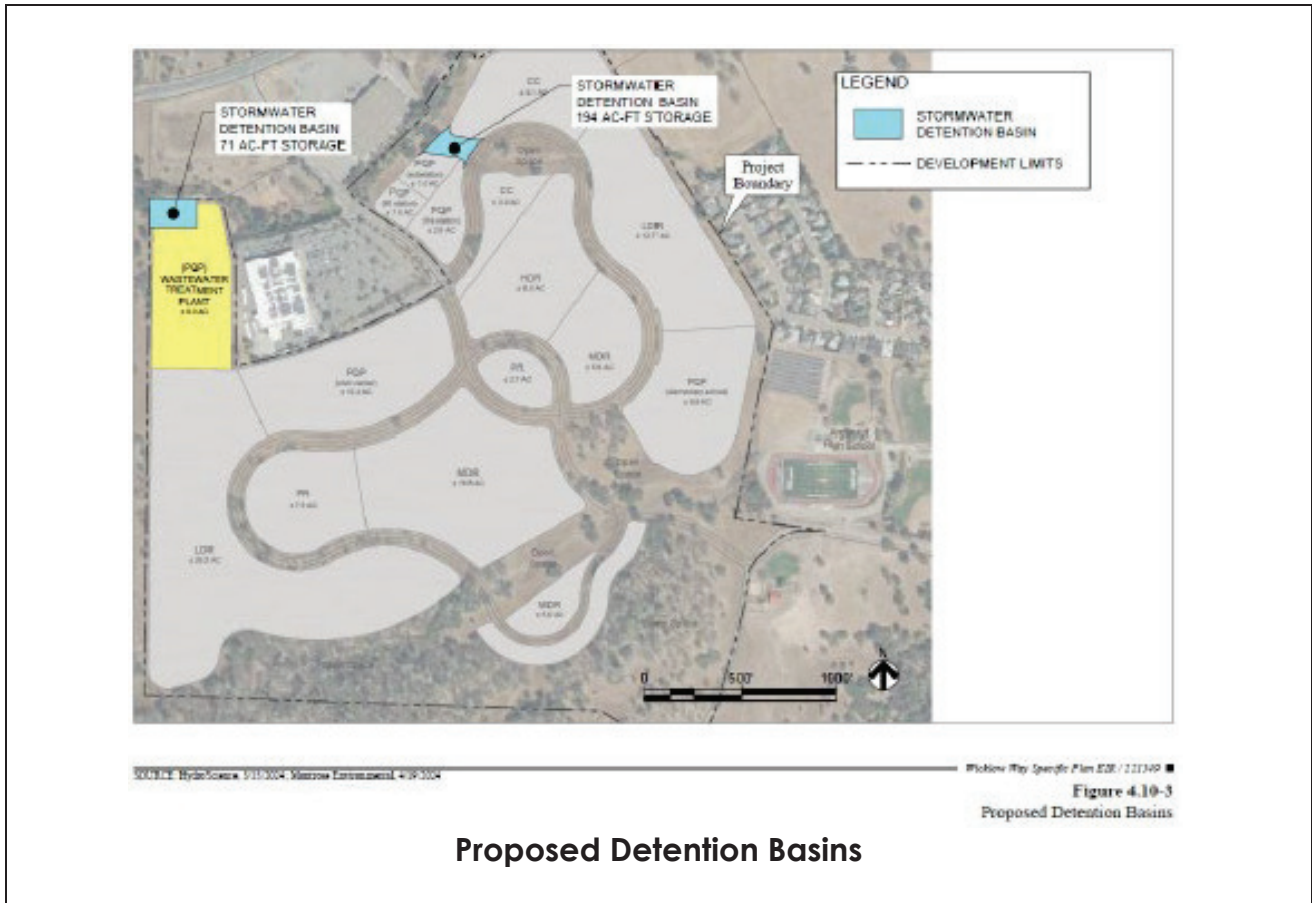
Land use summary



Project Boundary Soil Types



Proposed Hydrology



Based on existing topography, a portion of the project site runoff flows towards the State ROW. We request to review the pre- and post-construction runoff calculations and drainage plans to understand flow patterns.

Once the drainage plans and calculations are submitted, additional review will be done.

Travel Operations

Regarding the Traffic Impact Study (TIS), please provide the electronic Synchro files and raw traffic count data for Caltrans to review. Please include the electronic SimTraffic history files.

From the previous review, please address the issue of pedestrian or vehicle traffic from Westview Drive, the immediate surrounding housing, and potential solutions and provide the largest truck turning analysis at the intersection of SR 88 and Wicklow Way.

The TIS shows the results for Level of Service (LOS) and Delay for each study intersections under different study scenarios. Besides LOS and Delay, the TIS should

also show the results for the 95th percentile queues for each movement of the study intersections under different study scenarios.

The TIS's 95th percentile queue analysis results are expected to be shown in SimTraffic instead of Synchro to measure the full impact of queueing and blocking. SimTraffic is designed to model networks of signalized and unsignalized intersections, closely spaced intersections with blocking problems, and the effects of signals on nearby unsignalized intersections and driveways. In order to determine if studied intersections coordinately operate (especially queue distances between signalized intersections, between signalized and unsignalized intersections), they need to be coded as actuated coordinated. Additionally, SimTraffic should include a 10-minute seed time and 60-minute record time of 15-minute intervals, and the model should be recorded with 5 to 10 simulation runs. Please use Synchro/SimTraffic V12 for the analysis.

Due to the proximity of designed intersections at SR 49 and SR 108 along SR 88, please determine whether or not they need to be analyzed in conjunction with the intersection of Wicklow Way and SR-88.

Green House Gas

General CEQA comments

Evaluation and identification of environmental impacts must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Several sections throughout the document only discuss construction impacts and omit operational long-term impacts that would result of the proposed development.

Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design. Mitigation language should be strengthened throughout the document. Suggest replacing "where and when feasible" from proposed measures.

Greenhouse Gas Emissions

DEIR identified significant and unavoidable impacts related to GHG emissions. While Caltrans applauds the project proponent for including measures to reduce construction and building emissions, there is a greater opportunity to include measures to reduce VMT and enhance carbon sequestration that would assist the county and Caltrans attempt to achieve alignment with state GHG reduction targets.

Suggest including the following measures to enhance the mitigation levels for this significant impact.

- Increase tree planting in open spaces.
- Coordinate with transit providers to ensure additional stops provided have adequate services to necessary destinations.
- Include charging stations off site at shopping areas or other locations across the county to enhance the electric vehicle network to incentivize usage.
- Enhance complete streets components to ensure desirable given projections of future climate projections such as increased temperatures and extreme heat (for example- ensure shade and cover are available at new transit stops)

Wildfire

The specific plan seeks to allow the development of housing, schools, and recreation space within a High Fire Hazard Severity Zone. Section 4.17 discusses that the SR 88 and SR 49 have been identified in the County Emergency Evacuation Plan, but “during evacuations for major emergencies traffic congestions occurs and affect the ability of the public to evacuate in a safe and timely manner.” Additionally, the EIR states that new roadway access will be provided via Wicklow Way and Stony Creek Road to provide quick access to SR 88 and SR 49.

Additional information regarding the potential for expected vehicle volumes that would result from the development should be provided to Caltrans for discussion of the potential for additional strain to the highway network during an emergency to determine the need for ensuring the safety of the traveling public during wildfire or other emergencies requiring evacuation.

Valley Fever Exposure Risk

With respect to the increased risk of Valley Fever Exposure mentioned in the DEIR, only construction impacts are evaluated. Given the goal of the specific plan to guide the overall development of 201 acres to include residential housing, elementary school, open space, and parks and recreation uses where children, adults, and animals can be exposed, risks of long-term operation (living, outdoor recreation, etc.) and use should be disclosed within the DEIR for the specific plan.

Suggests that a health risk assessment may be warranted for this issue. Given the higher-than-state average occurrences in Amador County, soil testing may be warranted for informational purposes for future residents, highway construction/ road workers, firefighters, and others that may be affected beyond the construction period.

For potential construction impacts, please coordinate with the Caltrans Maintenance Supervisor assigned to the area to ensure all highway workers are properly informed of the risk of valley fever exposure during development.

Travel Forecasting

Page 11 of the Transportation Analysis (Appendix F), Figure 4 shows SR 88's maximum hourly traffic volume of 983 vehicles at the intersection. Since the existing counts were done in February 2024, these counts are one of the lowest counts of the year. Caltrans Traffic Volumes book for 2022 shows a peak hour volume of at least 1,150 vehicles for that general location on SR 88. Seasonal growth adjustment factors for this area may need to be applied, and traffic counts during the summer months may need to be obtained to account for recreational travel traffic volumes on SR 88.

Page 14 in Section 4.1 Project Trip Generation and Table 4 on page 15 both mention Land Use 820 for Commercial/Retail space greater than 40,000 square feet. According to the 11th Edition of the Trip Generation Manual, this category appears to be the incorrect Land Use. Land Use 821 appears to be the more appropriate Land Use category for this commercial/retail development.

Page 21 mentions "For the cumulative conditions, the existing turning movements plus incremental growth of 0.5% per year in background traffic based on the Amador County Travel Demand Model." A cursory inspection of the ACTC model in the vicinity of the proposed development appears to show a slightly higher growth rate, approximately 1%. Is the 0.5% per-year growth rate intended to represent the entire county in the model or just the area where the proposed development is located?

Advanced Planning

Caltrans D10 supports any local agency efforts to implement denser, compact, mixed-use, mixed-income development that provides residents and workers with transportation options beyond just depending on single occupancy vehicles. Any effort the Specific Plan has to build separated and protected bicycle lanes will help support viable alternatives to driving, as well as the development of house types that provide affordability to a range of incomes and that are within walking distance to retail, green space, office, and institutional land uses. To enhance safety, reduce stress, and promote accessibility, we encourage the Specific Plan to include street calming and road diet features to slow down traffic. Based on what's provided in the documentation, the Specific Plan attempts to address these planning elements. Although the Specific Plan does have a land use map on pages 3-2, a map with more detail on proposed transportation features would be helpful.

Krista Ruesel
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Caltrans suggest Amador County Planning Department continue to coordinate and consult with Caltrans to identify and address potential cumulative transportation impacts that may occur from this project and other developments near this location. This will assist Caltrans in ensuring that traffic safety and quality standards are maintained for the traveling public on existing and future state transportation facilities.

If any future projects arise from this Plan, Caltrans requests to review and comment on those projects. Additionally, if activities encroach into State ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. These studies will include an analysis of potential impacts to any cultural sites, biological resources, hazardous waste locations, and/or other resources within State ROW at the project site(s). For more information, please visit the Caltrans Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>

If you have any questions or concerns, please contact Paul Bauldry at (209) 670-9488 or by email at paul.bauldry@dot.ca.gov, or me at (209) 483-7234 (email: Gregoria.Ponce@dot.ca.gov).

Sincerely,



Gregoria Ponce'
Deputy District Director (Acting)
Planning, Local Assistance and Environmental

cc: State Clearinghouse