



Amador School Consolidation Traffic Issues

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Topics For Today



- a) Traffic Safety Issues
- b) Improper VMT Threshold
- c) Inadequate Mitigation
- d) ACTC's Requests

Traffic Safety Issues



Traffic Safety is Not Adequately Addressed



- The DEIR does not address the issue of traffic safety, perhaps in the mistaken belief that safety is no longer a CEQA issue post SB-743.
- SB-743 clarifies that when it replaced vehicle LOS with VMT as an impact metric under CEQA, the change did not affect other transportation impact metrics. Per PRC § 21099(b)(3):

"This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation." (emphasis added)

- The EIR must address traffic safety impacts. This has been pointed out to the District by multiple agencies on multiple occasions.

What Did the DEIR Study?



- Caltrans sent a comment letter to the Notice of Preparation asking the District to study queuing issues at three specific intersections
- The DEIR traffic consultant did perform an operations analysis at a number of intersections, including the three cited by Caltrans.
- However, this analysis was not incorporated into the body of the DEIR and is instead found in Appendix K, which is described in the DEIR as being "... *for informational purposes only*" rather than being part of the impact analysis
- No safety impact analysis was done. The wording in the DEIR implies that only a VMT analysis is required: "*LOS is no longer used as a measure of transportation impacts under CEQA. Transportation impacts, and the following analysis, will instead be evaluated based on a project's effect on VMT.*"

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Why Are Caltrans and ACTC Concerned About Queuing?



- The issue is that if the project lengthens the queues at key intersections the queues may extend past the existing turn pockets and into the travel lanes
- Also, drivers get impatient in long queues, and engage in risky behavior as a result (turn into gaps in the opposing traffic that may not be sufficient)
- Having stationary, queued vehicles on a roadway where traffic typically moves at 45+ MPH would greatly heighten the risk of rear-end collisions
- The fact that many of the vehicles would be driven by inexperienced high school drivers exacerbates the issue

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DEIR's Queuing Analysis Seems Odd



- Caltrans NOP comment letter requested that the intersection analysis be done using Sychro (Caltrans standard software and the most widely used). The DEIR used Vistro instead
- The results are very different

Queuing at SR 49/88 at Argonaut Lane

Lane	DEIR (ft)				Synchro (ft)			
	Existing AM	Existing PM	Existing Plus Project AM	Existing Plus Project PM	Existing AM	Existing PM	Existing Plus Project AM	Existing Plus Project PM
EB Thru/Right	0	0	0	0	7	18	26	27
WB Left	3	5	7	7	40	64	71	75
WB Thru	0	0	0	0	0	0	0	0
NB Left	41	87	146	275	72	142	247	880
NB Right	41	87	146	275	64	64	71	72

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DEIR's Queuing Analysis Seems Odd



- For the VMT analysis, the DEIR used data on the students' home locations relative to the school locations
- But for the queuing analysis, they factored up existing traffic volumes without regard to where the new students would be coming from:

“Vehicular traffic going to/from the schools were distributed at each intersection according to the turning movement proportions consistent with the existing counts for both the AM and School PM peak hours.”

- So the DEIR's queuing analysis underestimated the impact of the project on the turning movements most affected

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SR 49/Argonaut Lane



- 38 collisions in last 10 years, including a fatality
- 9 of these occurred on school days around the start and end of the school day at Argonaut High School



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SR 49/Hoffman Street



11 collisions in last 10 years, including a fatality
5 during school opening & closing times



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SR 49/Sutter Street



19 collisions in last 10 years, including a fatality

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**Improper VMT
Threshold**



Thresholds Matter



- EIRs are informational documents as well as policy documents. The first requirement is that impacts must be disclosed, even if a Statement of Overriding Considerations is later adopted
- Thresholds are used to help policy makers and the public gauge the extent of an impact. An improperly lax threshold misleads the reader by understating the severity of an impact.
- Also note that thresholds are not the end of the story. Per CEQA Guidelines §15064(b)(2) (new with SB-743):

“Compliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project’s environmental effects may still be significant.”

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DEIR’s VMT Threshold



- Section 5.15.3.1 of the DEIR: *“There are no established significance criteria for schools, so this analysis uses no increase in the VMT per student for the impact criteria.”*
- Nothing is said about the origin of this threshold, and no substantial evidence is presented to support it, as required by CEQA
- Note that this threshold completely omits consideration of the VMT associated with other travelers to the school (parents, school employees, vendors, people who attend sporting and other events held at the school, etc.) who would also will be affected by the project
- Moreover, the State’s GHG goals require a reduction in VMT for projects going forward; continuing at current levels is no longer good enough

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Inadequate Mitigation



Proposed Mitigation is Inadequate



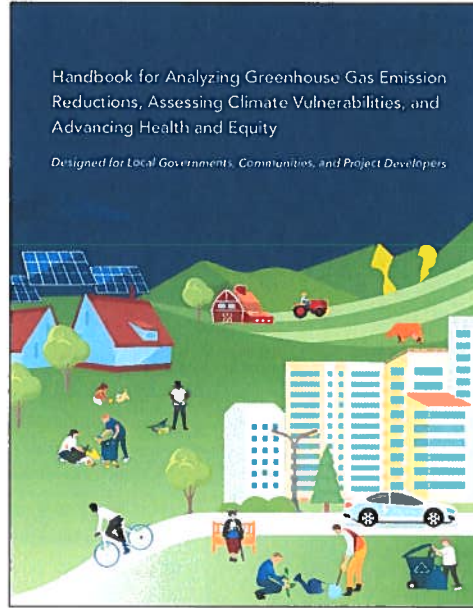
- The proposed mitigation section simply states that, at some unknown point in the future, the District will create a Transportation Demand Management plan
- A plan is not in itself a mitigation measure since it has no effect on impacts in the field. The DEIR defers identification of measures in violation of CEQA Guidelines § 15126.4, subd. (a)(1)(B) which says:

“Formulation of mitigation measures shall not be deferred until some future time.”

- You are allowed to defer if the agency commits itself to the mitigation and adopts specific performance standards the mitigation will achieve. The DEIR does neither

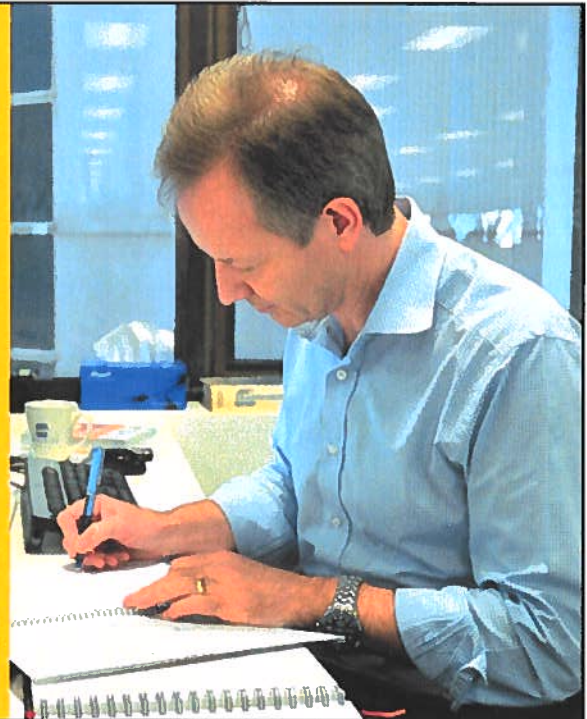
Help is Available

- There are publications available to help agencies identify suitable mitigation measures
- The CAPCOA handbook has over a hundred pages on transportation mitigations, including data to help quantify their effect (not done in the DEIR)



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ACTC's Requests



ACTC's Goals



- **Not** trying to stop the District's project; just want this project to follow the same rules that every other project has to follow, namely:
 - Do a proper safety analysis and include it in the EIR
 - Identify the District's mitigation measures, and quantify how much they reduce the project's impacts
 - Contribute the District's fair share of the cost of intersection improvements
 - Work with ACTC and Caltrans to find solutions that will work well for all parties concerned

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Wicklow Way (potential new entrance?)



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