

ANALYSIS

1. Inconsistent trip generation estimates between the Traffic Memorandum and the Project Description of the IS/MND

The Traffic Memorandum states, in relevant part, as follows:

The proposed project would require employees to operate the cultivation activities on a day to day basis. Peak cultivation would occur during the planting, growing, and harvesting season between May 1st through October 31st. During this time, it is anticipated the proposed project would require between 20-30 employees. Conservatively estimated, this would generate approximately 60 average daily trips over the approximate 6-month period. During the non-peak season, the number of employees needed is conservatively estimated at 10-15 employees. This would generate an average of 30 daily trips during this six-month period.

(Traffic Memorandum, pp. 4-5.) The Traffic Memorandum then summarizes these numbers in Table 3 – Project Trip Generation, but misleadingly labels the trips as “Trips Per Month”, when, in fact, the figures are daily trips, consistent with the foregoing text.

Table 3 – Project Trip Generation

Trips Per Month											
Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
30	30	30	30	60	60	60	60	60	60	30	30

Source: Traffic Memorandum, p. 5. The same figures generally appear in the Transportation section (Section XVII) of the IS/MND.

Problematically, the IS/MND Project Description provides different employee estimates and trip generation estimates. The IS/MND states, in relevant part:

The majority of efforts and work related to cultivation and operations of the proposed project would be focused during the growing season. The following summarizes the demands for employees and operations of the proposed project:

- Between 30-40 employees for 22 weeks of the year.
 - During October, there is the potential for up to 65 part-time employees during the peak season.
- Approximately 10 employees are anticipated to reside on-site.

- Trips per day are conservatory estimated at 40-80 Average Daily Trips (ADT).

(IS/MND, p. 11.) The Traffic Memorandum and the IS/MND Transportation analysis do not take into account these employee counts.

Further, the peak-season estimate of 65 part-time employees results in a daily trip estimate of approximately 130, which exceeds OPR's 110-trip threshold below which traffic impacts are presumed to be less than significant.

Finally, neither the Traffic Memorandum nor the IS/MND quantify vendor and delivery truck trip counts, which only exacerbates the undercounting in the Traffic Memorandum and Transportation section compared to the Project Description, and results in an incomplete analysis. Given the large number of processing and drying facilities (totaling 11 buildings and approximately 111,000 square feet of building space), we would expect the number of trucks necessary to serve such a complex would be significant, but in any event more than the "zero" currently accounted for in the Traffic Memorandum and IS/MND.

Further, we understand that outdoor cultivation projects (exclusive of the intensive processing facilities involved in this Project) typically required between 2 and 3 employees per acre of cultivation. The estimate of 65 peak-season employees for this 80-acre project is clearly low, and does not appear to account for staffing of the 11 processing facilities. Based on our experience, we would expect this Project to require between 160 and 240 employees, with resulting employee-only trips of between 320 and 480 per day.

In summary, the inconsistencies between the IS/MND Project Description and the analyses in the Traffic Memorandum and the IS/MND Transportation section, accompanied by the complete failure to quantify vendor and delivery truck traffic, render the IS/MND "less than significant" conclusion wholly unsupported by substantial evidence. Correction of these defects will require revision and recirculation of the IS/MND, at a minimum.

2. The IS/MND fails to analyze increased safety hazards on High Valley Road due to Project truck traffic

CEQA Appendix G, Section XVII (Transportation), subdivision (c) asks whether a project will "Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)." High Valley Road is the primary access route to the Project, and is a narrow and sharply-winding road. The Traffic Memorandum and IS/MND state that between June 1, 2019 and July 14, 2021, there were no reported vehicle accidents along High Valley Road.

However, the relevant question is whether the Project will increase hazards, not whether non-Project-related hazards have occurred in the past. In this regard, the California Highway Patrol commented in a July 9, 2021 communication that the Project has the potential to increase traffic congestion, traffic complaints, and traffic collisions on High Valley Road, particularly in the initial stretch of High Valley Road off of State Route 20.

Neither the IS/MND and Traffic Memorandum provide any analysis as to why Project-related traffic, and in particular truck traffic, will not substantially increase hazards along High Valley Road as suggested by the California Highway Patrol (CHP) (email correspondence from Daniel Fansler). As it stands, the CHP constitutes substantial evidence indicating that the Project may have a significant impact in this area.

Recommendation

The lack of traffic data review and analysis, the inconsistency of employee count compared to the with the data in the Initial Study, and the misleading trip generation information render the Kimley-Horn Traffic Memorandum inadequate.

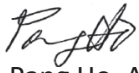
To fully understand the Project's traffic impacts, the Traffic Memorandum needs to be revised to include a discussion of the following critical areas:

1. Include a project site plan showing the internal circulation of the site, with a discussion of the parking spaces needed for employees, visitors, deliveries, driveway way access, and County parking code requirements for the project.
2. Identify and discuss the number of employees, including seasonal, part-time workers, visitors, wholesale/retail buyers, and deliveries. Clarify the daily trip generation, both for the average days and peak season days for the proposed cannabis project.
3. Identify the current traffic volumes and control at the intersection of the site access road and High Valley Road and what kind of traffic control, lane markings, would be needed with the proposed project. Discuss any sight restriction issues, due to both horizontal and vertical curves on High Valley Road near the site access.
4. Identify current traffic load and any capacities-related issues on High Valley Road near the site access. Evaluate whether or not there are traffic operation issues at the intersection of High Valley Road at the site access.
5. Discuss the potential project construction traffic impacts; identify the number of construction workers, and the number and type of trucks needed for the project construction. Identify and discuss the width of High Valley Road, being a narrow two-

lane County road that would be able to handle construction trucks traffic and the associated site related traffic.

Thank you for contacting us. Please feel free to contact me if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Pang Ho', with a stylized flourish at the end.

Pang Ho, AICP

PHA Transportation Consultants

About PHA Transportation Consultants

See attached description of qualifications.