



Orosz Engineering Group, Inc.

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OEG Ref 07-100107

May 16, 2008

John G. McClendon  
Leibold McClendon & Mann, P.C.  
23422 Mill Creek Drive, Suite 105  
Laguna Hills, CA 92653

Subject: Comments on Yucca Valley Supercenter DEIR

Dear Mr. McClendon:

Orosz Engineering Group, Inc (OEG) has been asked to review the traffic and transportation section of the subject report. Our review focused on the completeness of the technical study, potential impacts and mitigation measures. Further, the proposed site plan was reviewed. Our firm's background and qualifications of the reviewer are attached to this letter.

In summary, the report was technically accurate was prepared using standard practices and procedures to evaluate the project potential impacts. However, the following areas were not completely evaluated nor communicated to the decision makers. These issues should be addressed to provide the decision makers with a full and complete understanding of the scope of the potential impacts that can be expected with the approval of this project.

1. Underestimated Existing Conditions – The traffic section of the DEIR notes that the existing traffic count data is from 2005. The data included in the technical appendix notes intersection traffic counts dated June 23, 2004 and vehicle classification counts in 2005. The traffic study is dated July 2006, the DEIR is dated July 2007 and the hearings are scheduled in 2008. Traffic volumes more than two years old are typically too stale to use in a significant EIR (22 study area locations) in a growing area. At a minimum, the DEIR should use traffic data less than two years old to begin the analysis.
2. 2007 traffic conditions – In the traffic section, the growth rate was assumed to be 3% per year. Based on Caltrans traffic data, the historic growth rate along Highway 62 within the study area has grown between 2 and 7% per year with the average growth rate of 4.3%. The growth rate within the study area to the west of the project site is over 5% per year. Nearby, the growth rate on one portion of Highway 62 has been over 10% per year. The growth rate is high enough

not to rely on existing traffic data more than two years old to be representative for the basis of an environmental document.

3. Gross Project Trip Generation Underestimated – There are significant problems with the data presented in Table 4.15D. First is the primary trip rate for the Retail Store (229,000 SF). The land use code used in the DEIR represents a small free-standing discount store. The average building size for the ITE land use code 815 is 106,000 SF. The project is more than double that size. Secondly, there have been published studies in the ITE Journal (August 2006) that identify much higher PM peak hour trip generation rates (5.5 trips per 1000 square feet compared to the 5.06 trips per 1000 square foot used in the DEIR) for buildings like the one proposed in this EIR.
4. Pass-by Trips are Overestimated – The 1998 ITE Trip Generation Handbook reference is outdated. The current handbook is dated March 2001. The current handbook does not recommend a pass-by factor for Land Use Code 813 (Free-standing Discount Superstore) due its nature as a destination, not somewhere you stop by on your way. Due to the size of the building (over 220,000 SF) and size of parking field (over 1100 spaces), this type of facility does not lend itself to a quick in and out trip.
5. Internalized Trips are Overestimated – By adding up the actual traffic volumes related to the 10% internalized trip value, (which by itself makes some sense), is equivalent to 42.5% of the total traffic generated by just the Fuelling Station and Fast Food land uses combined. Further, just 10% of the Retail Store traffic represents 33% of the total trips generated by the Fuelling Station and Fast Food traffic, significantly more than the 10% internal trip estimate intended. The methodology for the internalized traffic trips overestimates the traffic that does not leave the site and underestimates the project's impact on the surrounding road system.
6. Project Contribution to Total New Traffic Underestimated – The basis of the growth in traffic is noted as being from the 2005 traffic volumes (Table H – Traffic Study Appendix M of the DEIR). The DEIR is based on 2007 baseline conditions and should be reflected in this table. By not accounting for two years of traffic growth in the baseline artificially reduces the project's contribution to future traffic conditions as those conditions in 2007 exist today, especially in light of the significant growth factors documented in number 2 above.
7. Project Impact at 2007 and 2030 Not Mitigated – The DEIR does an adequate job of identifying potential project impacts (given the underestimated trip generation, overestimated internalized traffic and overestimated pass-by traffic). However, additional impacts are likely to occur when the trip generation for the project is corrected. However, there are several project specific impacts that are not mitigated nor conditioned to be operational prior to the occupancy of the project.
8. Cumulative Mitigation Measures Not Complete – There are three locations that the impact of the project is direct and significant. At these locations, the fair share contribution should be

100% and should be constructed prior to occupancy. One of these locations is at the project driveway. The three locations are Balsa Avenue/Hanford Avenue/SR-62 (LOS D without project to LOS E with project), Avalon Avenue/Driveway I (project driveway at LOS F), and Avalon Avenue/Palisade Drive (LOS C without the project to LOS E with project). The cumulative mitigation for these three locations should be set apart from the other cumulative mitigation measures and identified as cumulative project specific impacts requiring 100% funding and implementation by the project. The total fair-share fees listed in 4.15.2B are too low based on the factors listed above and need to be recalculated.

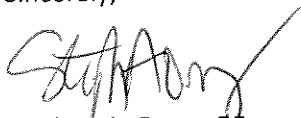
In summary, there are significant unavoidable impacts that have not been identified nor addressed in the DEIR.

1. Existing Baseline traffic underestimated – Historic traffic growth rate underestimated (3% compared to 4.3%)
2. Project Trip Generation underestimated – Land Use category used for big box retail was incorrect and the trip rates used were lower than published. The pass-by factor for the big box retail use was incorrectly applied. The internal trip reduction was overstated.
3. Project Impacts, due to the baseline and project traffic underestimates, are understated. Due to the trip generation for the project being underestimated, the project impacts are underestimated and the fair-share of cumulative improvements underestimated.
4. Baseline for the fair-share contribution is artificially low as the 2007 baseline values were not used.
5. Project specific cumulative impacts are not identified and addressed at three locations. This leads to an underestimate of the fair-share fees to be collected and leaves the timing of the implementation of these project specific mitigation measures unclear.

The combination of these factors leads to insufficient information being presented to the decision makers in terms of underestimates of the project traffic, impacts and necessary mitigation measures. These issues should be clearly addressed to provide the decision makers and the Town of Yucca Valley a true and clear picture of the potential impacts that can be anticipated with the approval of this project.

Should you have any additional questions, feel free to contact me.

Sincerely,



Stephen A. Orosz, PE

Orosz Engineering Group, Inc



Orosz Engineering Group, Inc.

**STEPHEN A. OROSZ,**  
**P.E., P.T.O.E.**  
Resume

## REGISTRATION

Professional Engineer  
Civil, RCE 36995,  
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Professional Engineer  
Traffic Engineer T 1209,  
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Professional Traffic  
Operations Engineer  
(P.T.O.E.), 213

## PROFESSIONAL SERVICE

American Society of Civil  
Engineers  
Institute of  
Transportation  
Engineers  
American Public Works  
Association  
State Board of  
Registration  
Examination Committee  
Member - Traffic  
Engineer License

## EDUCATION

Cal Poly San Luis Obispo,  
California  
BS Civil Engineering,  
Transportation, 1980

In 2002 Mr. Orosz, formed **Orosz Engineering Group, Inc. (OEG)** to provide more personal traffic engineering and project management services to a larger range of clients in Ventura, Santa Barbara and San Luis Obispo Counties. His emphasis is on providing innovative solutions to public and private clients.

Presently, his work has been expanding to include managing and providing project representation for commercial and residential projects in Santa Barbara and San Luis Obispo Counties. This representation has included presentations to approval bodies, applications, and developing an understanding of the needs of various agency members to achieve the desired approvals.

Prior to forming OEG, Inc., Mr. Orosz was the principal traffic engineer at Penfield & Smith Engineers. During his 14 years with the firm, he managed a growing department, provided site planning services, project management, and conducted various traffic engineering and transportation planning assignments. He is proficient in management and preparation of circulation system analyses utilizing both computerized and manual methods; traffic safety and high accident location analysis; traffic impact studies, reports and environmental document sections; traffic/parking surveys and reports; transportation planning and travel forecasting; traffic control device inventories and analysis; traffic operations analysis and design.

Mr. Orosz's transportation planning projects include a significant number of residential and commercial subdivision projects in the Central California counties of Santa Barbara, Ventura, San Luis Obispo, and Kern. Numerous traffic impact analyses of large (over two million square feet) and small (2,500 square feet) office, retail, hotel, and mixed use projects in Southern California.

He has completed traffic signal designs and street striping plans in Santa Barbara (City and County), San Luis Obispo, Ventura (City and County), City of Camarillo, San Diego, Orange and Los Angeles Counties and traffic control and street striping plans for various street improvement projects including sewer and water pipeline projects. Mr. Orosz has performed numerous parking demand and unique traffic generation studies throughout Central and Southern California. During the course of his career, Mr. Orosz has developed designs of various size parking facilities from 8 space parking lots to lots/structures totaling several thousand parking spaces.

His experience includes Transportation Demand Management (TDM) plan preparation for internal and external companies per local ordinance requirements and continued work with regulating agencies in the monitoring and development of livable and workable programs.