

LSC Responses to EPC DPW TIS Comments

February 15, 2022

Below is DPW comments to the latest submittal for PPR2133. DPW reviewed the updated *Letter of Intent*, the updated *Transportation Memorandum & Road Conditions Report*, and the *LSC Response to DPW Comments* document. The following five (5) items still require resolution with DPW comments and concerns outlined in blue below.

(1) – Pg 5 references the CDOT Access Permit Application “is attached.” This has not been provided and is required by the Development Agreement Item 3. Request developer to submit per agreement.

DPW Response: This form has been provided by the developer in Appendix B of *Gateway Trucking Trans Memorandum & Road Conditions Report* (dated 2 Feb 22). DPW has concerns with the *Total Count of Vehicles* (pg 1 of the provided CDOT Fm 137 in Appendix B). The form states 112 vehicles/day will utilize the access. Note, this does not align with the vehicle estimate from the new Transportation Memorandum. Moreover, DPW is not in agreement with this estimate which is outlined in our follow-up response to item (2).

LSC Response: The updated CDOT Form 112 is attached to the report. It is our understanding that CDOT, in the case of an "Access" being a public roadway connection to the State Highway, wants the trips in Block 17 to only include site-generated traffic, not all traffic using the intersecting public roadway.

(2) – Pg 12, 2nd paragraph states “LSC estimates that during peak season, when all 20 trucks are used for local projects, the site generates about 80 vehicle trips on the average weekday, with about half entering and half exiting the site during a 24-hr period.” Upon some cursory investigation via google maps satellite view, it appears the level of trucks/vehicles operating exceeds these estimates. Recommend developer and consultant provide and submit explanation on the attached satellite views.

DPW Response: In response to this concern, the developer and LSC reassert that the 80 vehicle trip estimate stands as accurate. The satellite views showing additional equipment was explained as additional equipment and not active trucks. DPW recommends with this yard currently active that actual data be used in the vehicle trip estimate. This can be accomplished through assimilation of actual trip data (if Gateway can provide) or by taking actual vehicle counts over a representative period (preferably by developer/LSC or if need be the County). Bottomline, both existing and maximum are presented as *estimates*. DPW asserts there is no need to give estimates if actuals are known and can be determined.

LSC Response: Additional language has been added to the narrative of the report. Also, please refer to the applicant's letter of Intent for additional detail. Gateway has provided dispatch records which are consistent with the 20 driver/80 trips per day estimates. The "actuals" were a snapshot on the day the 2021 counts were conducted. The 80 trips per day have been used in the calculations. Keep in mind that considering annual averages, the 80 per day is likely conservative.

(3) – Pg 18, 4th bullet references a “geotechnical evaluation of the gravel roadway surface/structure is forthcoming.” Request developer provides a copy of this referenced Geotech evaluation.

DPW Response: Developer/LSC provided a surface assessment and a roadway/drainage condition in Appendix A and B respectively. Many assumptions were made from these assessments that factor into the cost estimate for upgrade of \$790,000. DPW requests the developer/LSC clearly defines this estimate, specifically what went into it and how that number was determined.

LSC Response: The cost estimate was based on the unit costs in the EPC Road Impact Fee Study document. The details of the calculation has been included in Appendix C of the updated report. The previous estimate of \$790,000 has been updated.

(4) – Pg 30, Section 9.1.1. *Short Term* provides recommendations for repair of deficiencies and cost estimate for “upgrade”, which correlates with the Developer requirement in Development Agreement Item 2.b). Request developer provides more detail and confirmation of infrastructure adequacy, as further mentioned on Pg 19-20, Section 6.3, 3rd bullet.

DPW Response: Response above to (3) addresses our remaining concern with determination of the cost estimate.

LSC Response: Regarding the gravel road surface condition or structural composition, LSC and Entech Engineering will contact EPC Engineering staff regarding the latest direction for formulation of cost estimation.

(5) – Pg 30, Section 9.1.2. *Long Term* provides proposed “applicant’s share” of 29%, which correlates with the Developer requirement in Development Agreement Item 2.c). Request developer resolves above item (2) and subsequently reevaluates or validates this proposed share.

With the developer reasserting the vehicle estimate of 80 veh/day as accurate, this 29% was determined by a simple division of estimated trips (numerator) “divided by” a maximum ADT estimate. DPW asserts that the “fair share” should not be based on solely predicted volume of total ADT. Majority of the vehicles operating on the Franceville Coalmine Road (beyond those generated by Gateway Trucking) are smaller POVs - - personally operated vehicles or cars/light trucks. Developer needs to propose a more accurate “fair share” given the effects of generated truck traffic. Proposing this share would decrease to 9% in the future with potential additional residential development, solidifies the need to address this “applicant share” beyond the terms of straight traffic numbers and a simple math equation.

LSC Response: It is our understanding that gravel road impacts by trucks are not comparable to truck relative impacts to gravel roads. To our knowledge, the ECM does not provide this criteria. LSC and Entech Engineering will contact EPC Engineering staff regarding the latest direction for formulation of relative impact calculation of trucks on gravel roadways. Consideration should also be given to: (1) other (non Gateway) trucks are using the roadway, (2) Gateway trucks travel on Franceville Coal Mine Road empty (both directions), and (3) similar to impacts to paved roadways, LSC suspects that vehicle loading and impacts on road maintenance should potentially be based on annual loading rather than peak season loading only.

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LSC Responses to PCD Engineering Division Comments

PCD Engineering Division Review #2:

- Insert the traffic statement to the traffic study, not as a separate submittal

LSC Response: The traffic statement/certification page has been inserted at the front of the traffic study document.

- Sign the "Applicant or Agent for Permittee" section of the CDOT access permit application form so it can be presented to the County Engineer for her signature.

LSC Response: Executed as requested (Note: the CDOT Form 112 was updated before signing)