3.10 Traffic, Parking, and Transportation

3.10.1 Sources of Information

The traffic analysis for the proposed project is based on an inventory of the local street network and intersection turning movement counts conducted by Transportation Solutions, Inc. (TSI) in September of 1998. Accident data and daily traffic volume information were obtained from the Washington State Department of Transportation (WSDOT).

3.10.2 Existing Conditions

3.10.2.1 Street Network

The main approach to Sumas, and the project site, is via State Route 9 (SR 9). SR 9 serves the City of Sumas, the adjacent border crossing, and the surrounding rural area. The U.S./Canada border crossing facility is the single most important factor affecting the general performance of the local street network.

SR 9 consists of a series of linked road segments that generally run in a north-south direction in rural Whatcom County. As SR 9 approaches Sumas it is known as Garrison Road and runs in a north-south direction. SR 9 then transitions into a short east-west segment known as Halverstick Road, which becomes Front Street just west of its intersection with Bob Mitchell Way. Front Street (SR 9) continues east, crossing the Burlington Northern rail lines. East of the crossing, SR 9 turns north to become the main north-south street (Cherry Street) in Sumas. The northern terminus of Cherry Street is the border crossing.

The Halverstick Road/Front Street segment of SR 9 is two lanes with narrow (2- to 3-foot) gravel shoulders. Drainage ditches border the road segment. There are no sidewalks. The speed limit on Halverstick Road/Front Street is 55 mph and reduces to 35 mph as Cherry Street is approached.

All segments of SR 9 within Sumas are classified as major collectors according to the Whatcom County road classification system. A major collector serves inter-regional and inter-county traffic as a collector to higher classified arterials. It typically has two travel lanes.

Bob Mitchell Way begins at its intersection with SR 9 and extends north where it joins with the western terminus of Garfield Street. Bob Mitchell Way was built by the Port of Bellingham to serve the international free trade zone that lies on the west side of Sumas. The road was constructed to support and serve the heavier load limits allowed on Canadian trucks and to separate truck traffic from the general circulation system. Bob

Mitchell Way consists of two lanes with approximately 4- to 6-foot-wide gravel shoulders. There are streetlights but no curbs or sidewalks. Southbound traffic on Bob Mitchell Way entering SR 9 is controlled by a stop sign. The speed limit along Bob Mitchell Way is 25 mph. Signs are posted indicating it is not a through road, to discourage non-industrial access.

Hesselgrave Way is a two-lane frontage road running east-west and parallel to SR 9. It intersects with Bob Mitchell Way on the east and turns south to intersect SR 9 at the eastern boundary of the IKO Pacific plant to the west. The road serves as an extension of Bob Mitchell Way and is designed to accommodate overweight trucks coming across the border to deliver or load products in the free trade zone. Hesselgrave Way also intersects SR 9 across from the entrance to the existing cogeneration plant. This intersection is intended to provide access between the cogeneration plant and Hesselgrave Way, and southbound turns onto SR 9 are not allowed.

The local street network and key traffic controls are illustrated in Figure 3.10-1.

3.10.2.2 Intersections Analyzed

All traffic associated with the proposed project would use Hesselgrave Way to enter or leave the project site. Once on Hesselgrave Way, traffic can enter SR 9 west of the site or if headed east, turn north onto Bob Mitchell Way or turn south to enter SR 9.

As shown in Figure 3.10-1, both of these intersections are controlled by stop signs. The SR 9/Hesselgrave Way intersection is regulated by a two-way stop controlling the south movement on Hesselgrave Way, while the Bob Mitchell Way/SR 9 intersection is controlled by a stop sign on Bob Mitchell Way. These intersections were selected for analysis based on consultation with City of Sumas staff and a review of existing traffic volume data.

3.10.2.3 Traffic Patterns and Volumes

The proximity of the border crossing dominates traffic circulation in the area. Most of the northbound border traffic uses SR 9 to enter Sumas and continues on to cross the border on Cherry Street. Conversely, the majority of the traffic entering the United States at Sumas travels south on SR 9.

Hesselgrave Way and Bob Mitchell Way carry truck traffic between the border and industrial sites within the free trade zone, which reduces truck volumes on SR 9 within the City limits.

Figure 3.10-1

A review of Average Daily Traffic (ADT) volumes from WSDOT data for SR 9 is shown in Table 3.10-1.

Table 3.10-1: Average Daily Traffic Volumes

Road Segment	1995 ADTV	1996 ADTV	1997 ADTV
SR 9 at Johnson Creek Bridge	5,100	5,200	5,300

Although daily traffic volumes provide a good indication of general travel patterns in the area, peak hour traffic volumes are typically used for analysis since they reflect traffic conditions when congestion is most noticeable. For the Sumas area, the weekday peak period is between 4 p.m. and 6 p.m. A summary of the afternoon/evening peak hour volumes recorded in September 1998 for the two key intersections is shown in Figure 3.10-2. Turning movements for the two intersections are also included.

3.10.2.4 Existing Levels of Service

The afternoon/evening peak hour traffic volumes shown in Figure 3.10-2 were analyzed to determine the level of service (LOS). LOS is a measure of the ability of a given intersection to serve the traffic on the street system. The level of service methodology used was developed by the Transportation Research Board and is summarized in the Highway Capacity Manual (Transportation Research Board 1994).

For intersections without traffic signals, the LOS is defined in terms of stopped time delay and is divided into LOS categories A through F. LOS-A represents a very good, free flowing traffic condition while LOS-F represents a breakdown in traffic flow. The existing levels of service at the two intersections were calculated for the afternoon/evening peak hour and are summarized in Table 3.10-2 below.

Table 3.10-2: Existing Level of Service Summary

Intersection	LOS (Stopped Time Delay in Sec.)
SR 9/Hesselgrave Way	A (0.3)
SR 9/Bob Mitchell Way	A (0.1)

The intersection at SR 9 and Hesselgrave Way is operating at LOS-A with a stopped time delay of 0.3 seconds per vehicle. The intersection of SR 9 and Bob Mitchell Way is also operating at LOS-A with a stopped time delay of 0.1 seconds per vehicle. Both intersections are operating at a very good level of service. The delay only affects southbound vehicles on Bob Mitchell Way or Hesselgrave Way that are turning left (east) onto SR 9. The delays are minimal.

Figure 3.10-2

3.10.2.5 Safety Conditions

Historic traffic accident information for the period of January 1, 1993, through December 31, 1996, was assembled for SR 9 from WSDOT records. During this time period, there were 13 accidents on the east-west segment of SR 9 between Garrison Road and Cherry Street (milepost 96.57 to 97.5). Of these accidents, only one occurred on the segment of SR 9 that includes the Hesselgrave Way and Bob Mitchell Way intersections (milepost 96.8 to 97.18). There were no accidents recorded for the SR 9/Bob Mitchell Way intersection or Hesselgrave Way/SR 9 intersection. The Hesselgrave Way intersection with SR 9 is a recent addition to the road network and accident data for 1997 and 1998 are not available to determine if it has caused a change in accident frequencies or rates. A summary of the traffic accident history for this time period is presented in Table 3.10-3.

Table 3.10-3: Traffic Accident Summary (1993-1996) (Milepost 96.57 to 97.5)

Year	Intersection or Driveway Related	Not Related to an Intersection or Driveway
1993	0	2
1994	1	3
1995	0	1
1996	2	4

3.10.2.6 Future Plans and Projects

The City of Sumas Six-Year Transportation Improvement Program identifies transportation project priorities. There are no planned street improvements identified for either of the intersections analyzed. Hesselgrave Way is a recent addition to the local road system that was constructed in conjunction with the IKO Pacific development.

3.10.2.7 Consistency with Local Comprehensive Transportation Plans

The City of Sumas Comprehensive Plan includes policies regarding the local transportation system. Separating commercial truck traffic from the local circulation system is key to minimizing local transportation impacts. The construction of Bob Mitchell Way in conjunction with the establishment of the free trade zone provides this separation. The recent addition of Hesselgrave Way as an extension of Bob Mitchell Way completes this separation and consolidates truck access to SR 9.

3.10.3 Environmental Impacts of Proposed Action

3.10.3.1 Construction

Traffic and parking impacts would be much greater during construction than during operation. Following preparation of the site, construction activities would last approximately one year. The majority of the activity would occur within the site and entail such traffic-related activities as hauling of fill materials, concrete, and other construction materials as well as vehicle trips associated with construction workers. In addition, the 2.5-million-gallon fuel oil storage tank[1] would be filled using tanker trucks traveling on the same local routes (Section 3.10.3.2). It is anticipated that the delivery of construction supplies would average between 20 and 30 truck trips per hour.

Construction documents would require the contractors to submit (for review and approval) a traffic management plan addressing all aspects of project construction. The specification would further require specific repair procedures and cleanup provisions to maintain the existing roads in their preconstruction condition. In the event that the construction traffic causes damage to the affected roads, the contractor would be required to repair those sections to meet state and local standards. Road repair requirements have also been set forth in an agreement (Appendix G) between the applicant and the City of Sumas.

Site Preparation

Peak truck activity would occur during site preparation when the site is filled and graded. It is projected that approximately 130,000 cubic yards (188,627 tons) of fill material would be imported to bring the construction site to its final grade. This material would be delivered by truck and trailer (32-ton capacity) over a 90-day period and require a total of approximately 5,895 truck trips. Trucks would generally originate from local borrow and quarry sites identified in Figure 3.10-3.

Based on an eight-hour day, five-day-per-week work schedule, on average, approximately 89 daily truck trips (11 trucks per hour) would be required to import all fill material within the 90-day period. However, it is anticipated that the staging for this initial phase of construction would be designed to accommodate 25 to 30 trucks per hour. It is estimated that 25 to 30 trucks of material per hour is a reasonable volume that could be unloaded, distributed, graded, and compacted without creating a backlog. It should be noted that weather conditions or traffic congestion associated with the border crossing

1 In its final briefing to the Energy Facility Site Evaluation Council (September 5, 2000) the applicant proposed to reduce the diesel storage tank size to 1.5 million gallons. The environmental impact of this proposed design modification has not been analyzed in this FEIS. Using a smaller tank would decrease the number of trips required for initial filling of the tank.

Figure 3.10-3

could cause hours of operation to be extended or restricted. For example, during periods of peak border crossing activity, significant delays could be encountered and it may not be efficient to attempt delivery of large volumes of material.

The majority of these trucks would travel between the project site and gravel mining and processing facilities located to the south. These facilities include the Romberg, Agwest, and Nooksack gravel pits. Trucks transferring material from any of these facilities would approach the project site from the west on SR 9.

The effect of 30 inbound and 30 outbound truck trips per hour on SR 9 would be a noticeable change but not adversely affect local circulation patterns. Eastbound trucks would turn left at the SR 9/Hesselgrave Way intersection and proceed east on Hesselgrave Road towards the project site. The number of trucks making this movement per hour is significantly less than the forecasted volume of traffic from construction workers arriving in the morning hours and departing in the afternoon and evening hours. The results of a level of service analysis for arriving and departing construction worker traffic are described below. During fill hauling operations the intersection at SR 9 and Hesselgrave Way is expected to operate at LOS-A with minimal delay. Because of the low volume of westbound traffic there should be ample gaps to allow the forecasted volume of eastbound left turns without causing delays for eastbound through traffic.

Trucks delivering construction materials could potentially be delayed on Hesselgrave Way while waiting to move onto the construction site. Because of the low traffic volumes on Hesselgrave Way and the temporary nature of such delays, it is not anticipated that traffic circulation on Hesselgrave Way would be adversely affected.

The majority of trucks delivering fill materials would be truck trailer combinations with a gross vehicle weight of 105,500 pounds. Because of the proximity of the border crossing, the portions of SR 9 near the project site currently carry a relatively high proportion of truck traffic. The surface condition of the pavement near the site is good and it is not expected that the delivery of fill material would significantly degrade existing conditions. However, there is the potential for trucks leaving the project site to carry mud onto adjacent roads. A program should be in place to clean exiting trucks as well as monitor and clean adjacent roads as needed.

Workforce Transportation and Parking

The number of construction workers is expected to peak at slightly more than 400 over a 4-month period. During this period of peak activity, there would be three shifts. The start time for each 10-hour shift would be staggered with workers on the site for 12 hours from Monday through Thursday. Construction activity would be minimized on Fridays to avoid potential conflicts with peak weekday traffic associated with the border crossing. Table 3.10-4 illustrates the distribution of shifts and workers during this peak period.

Table 3.10-4: Anticipated Construction Shifts and Worker Distribution

Time of Day	Number of Construction Workers		
	Arriving	Departing	Onsite
7:00 a.m.	120	0	120
7:45 a.m.	200	0	320
8:30 a.m.	80	0	400
5:30 p.m.	0	120	280
6:15 p.m.	0	200	80
7:00 p.m.	0	80	0

In order to present a worst case perspective, it is assumed that during peak conditions approximately 200 workers would arrive in the morning and depart in the afternoon/evening within a 30-minute period. It is also assumed that all workers would arrive in single occupant vehicles. The distribution of arrivals and departures would be as follows:

- 85 percent distributed towards the west on SR 9
- 5 percent oriented towards the northeast traveling to the site via Bob Mitchell Way
- 10 percent from the east on SR 9

This distribution was used to project construction worker traffic at the intersection of Hesselgrave Way and SR 9 and perform a level of service analysis for both morning and afternoon/evening peak hour periods. Existing traffic counts were not available for the morning peak period. However, it is assumed that the morning traffic volumes are similar to the afternoon/evening peak hour volumes with the traffic flows being reversed. That is, the westbound afternoon/evening peak hour traffic volume on SR 9 should be approximately the same as the morning eastbound traffic volume. Traffic volumes from the afternoon/evening peak hour counts of existing traffic were transposed in this manner to establish a basis for calculating the morning peak hour level of service during construction. The results of the level of service analysis are presented in Table 3.10-5 below.

Table 3.10-5: Level of Service at SR 9/Hesselgrave Way during Peak Construction

Time Period	LOS (Stopped Time Delay)	
	1998 Existing	2000 During Construction
A.M. Peak Hour	A (0.3)*	A (1.2)
P.M. Peak Hour	A (0.1)	A (1.4)
*Average vehicle delay in seconds.		

During the morning peak period, the intersection would continue to operate at a very good level of service. However, there is the potential that eastbound left turning vehicles (that is, arriving construction workers) could create delays for eastbound through traffic. A closer evaluation of the eastbound left turn movement indicates that it would also operate at LOS-A with a slight increase in delay to 1.8 seconds. The calculated maximum queue length for the eastbound left turn movement would be one vehicle. The probability of a queue free state for this movement is 82 percent. This analysis indicates that due to the relatively low westbound traffic volume, there would be sufficient gaps in the traffic flow to accommodate the eastbound left turn movement without creating delays to through traffic.

During the afternoon/evening peak period the intersection would also operate at LOS-A with an average intersection delay of 1.4 seconds per vehicle. The through traffic on SR 9 would not be delayed, while the southbound traffic (predominantly departing construction workers) turning onto SR 9 would have a delay of 4.1 seconds per vehicle. The southbound vehicles are controlled by a stop sign and would be slightly delayed as they waited for gaps in the westbound through traffic.

Based on this analysis, the SR 9/Hesselgrave Way intersection can accommodate projected peak levels of construction related traffic without modifying its existing configuration. The Bob Mitchell Way/SR 9 intersection would not experience a significant increase in traffic during construction and was not analyzed.

All parking for construction workers would be accommodated in a separate unpaved area adjacent to the northeast corner of the project site on land optioned by the applicant from the Port of Bellingham (Figure 2-2). The area would be used for parking, construction office trailers, construction lay-down, and other temporary uses during construction. Access to the parking would be through a temporary access road connecting the parking area to Hesselgrave Way.

It was assumed that all workers would arrive in single occupant vehicles and that during peak periods of activity there would be 400 vehicles on the site. This presents a worst case scenario for traffic analysis purposes. There are a number of factors that would motivate workers to share rides to the work site. These factors include:

- The distance of the work site from major population centers to the west
- The fact that the majority of workers would commute to the site from the west
- The fact that there is only one major road (SR 9) serving the site
- Existing relationships between area contractors that would work at the site
- Existing relationships between local union members and trade organizations.

The proposed parking supply of 300 stalls would accommodate the peak work force of 400 workers if the average vehicle occupancy were 1.4 workers. To facilitate the formation of carpools, the general contractor should provide space where construction workers can post notices seeking ride share opportunities. In the event that parking demand exceeds the supply, the contractor would create additional parking spaces along

the east boundary of the site. In addition, the contractor should monitor adjacent roads if required to prevent spillover parking.

Installation of Natural Gas Pipeline, Water/Wastewater Lines, and Electric Transmission Lines

Offsite construction activities include construction of gas, water, and power transmission lines.

The new gas line would be installed parallel to the existing line serving the existing cogeneration facility. The existing line crosses the border east of the Sumas River, heads south, then west, and finally north to terminate at the existing cogeneration facility. The proposed line would follow this route and extend under SR 9 to enter the project site. At road crossings, both the gas and water lines would be installed by boring under the road.

The preferred electric transmission line route follows Bob Mitchell Way north and then at the west terminus of Garfield Street follows the rail line to the border. Temporary construction impacts would be associated with preparation and placement of transmission poles and installation of power lines. Temporary street closures may occur while transmission poles are installed and maintained.

3.10.3.2 Operation

Onsite Facilities

S2GF would operate 24 hours a day, seven days a week. It is anticipated that there would be between 25 and 30 people employed at the site. Of these, eight would work standard office hours while the rest would work 12-hour shifts. There should be no more than 20 employees onsite at any given time. Traffic would enter the site from Hesselgrave Way, which intersects with SR 9 to the west and Bob Mitchell Way to the east.

Forecasted Traffic Conditions

For the purposes of this analysis, 2002 was selected as the design year for forecasting the future traffic conditions. By this date, it is anticipated that the project would be fully operational. It does not consider traffic conditions that are the result of border crossing activity related to weekend or holiday travel. The forecasted travel demand on streets in the vicinity of the site is composed of three elements: (1) existing traffic; (2) future non-project traffic; and (3) forecasted project generated traffic.

Non-project Traffic Volumes. Future non-project traffic growth includes other projects that are planned but not yet operational, the effects of population growth, and changes in traffic patterns due to street improvements or operations. For the purposes of projecting future traffic volumes, it is assumed that the existing border crossing volumes, as represented by traffic volumes on SR 9 and its adjoining intersections, provide base

values for future projections. There are no other known projects in the vicinity that would add to future traffic volumes. Background growth in traffic volumes is projected to increase at the rate of 2 percent per year. The value of 2 percent is based on information contained in the City of Sumas Draft Comprehensive Plan, which projects traffic volume increases associated with long term growth. This rate of growth was applied to the existing traffic volumes to forecast traffic conditions in 2002 without the presence of the S2GF.

Project Generated Traffic Volumes. It is anticipated that there would be a maximum of 30 people employed at the site. Of these, eight would be working normal office hours and should depart during the afternoon/evening peak period. The remaining employees would work 12-hour shifts and not arrive or depart until after the peak period has passed. Based on these assumptions it is anticipated that there would be only eight trips departing the site during the afternoon/evening peak period. It is assumed that all of the employee trips would be by single occupancy vehicle. Because the delivery of fuel oil would not occur on a daily basis, those truck trips are not included in the analysis. (See Backup Generator Fueling later in this section for a discussion of truck trips associated with fuel oil delivery).

The distribution of new trips onto the local road network is based on existing traffic patterns. This distribution is expressed as a percent of the total volume that turns in a specific direction. The percent values are applied to the projected new trips that would arrive or depart from the project. Figure 3.10-4 illustrates the assignment of new project generated trips to the local road network. These project-related trips are added to the non-project background growth to illustrate the future traffic volumes when the project is operational. This summary of future traffic conditions is illustrated in Figure 3.10-5.

Traffic Analysis. A level of service analysis was prepared for each of the intersections analyzed to show the traffic condition in 2002 without the project and in 2002 with the project. Both intersections would continue to operate at LOS-A under future conditions (Table 3.10-6).

Table 3.10-6: Existing and Forecasted Level of Service Summary

Intersection	LOS (Stopped Time Delay)		
	1998 Existing	2002 w/o Project	2002 w/Project
SR 9/Hesselgrave Way	A (0.3)*	A (0.3)	A (0.4)
SR 9/Bob Mitchell Way	A (0.1)	A (0.1)	A (0.1)
*Average vehicle delay in seconds.			

Figure 3.10-4

Figure 3.10-5

Site Access. Access to S2GF would be available from two points on Hesselgrave Way. The primary access point is proposed to be located approximately 400 feet west of the intersection of Hesselgrave Way with Bob Mitchell Way at the southeast corner of the site. The secondary access point is proposed to be located at the southwest corner of the project site, and would be used for emergency access only.

Safety Conditions. Accident rates at both of the analyzed intersections were low. There is no existing methodology that accurately predicts future traffic accident rates. It is generally assumed that accidents increase as traffic volumes increase. Based on this assumption it is not anticipated that there would be any measurable increase in traffic accidents due to the additional traffic generated by the project. Since project-related traffic is such a small percentage of overall traffic volumes, no project-specific mitigation to improve safety along this corridor is warranted or recommended.

Discussions with City of Sumas staff indicated WSDOT is concerned that development along the north side of SR 9 may cause increases in left turn volumes from SR 9 onto Hesselgrave Way that would warrant installing a center left turn lane. Existing turning movement counts (Figure 3.10-2) indicate that this is not a problem during the afternoon/evening peak period. Morning volumes were not analyzed as part of this study.

Transmission Line Right-of-Way Maintenance. Where the proposed transmission line runs parallel to public streets, temporary short-term lane restrictions may occur during work hours in order to allow work crews access to the ROW and maintain public safety.

Backup Generator Fueling

Fuel oil, as a secondary fuel source would be delivered by tanker truck and stored in a 2,500,000-gallon storage tank[2] within the site. The primary source of fuel oil is expected to be Shell Canada located in Abbotsford or Surrey, British Columbia with a secondary source being the ARCO refinery located in Ferndale, Washington. At the end of the construction period, the initial filling of the tank would occur. This would require 250 truck trips that would likely be spread out over 10 to 15 working days with an average of one truck per hour delivering fuel.

When the facility is operating, fuel deliveries would be intermittent during the winter months to replace burned fuel. The facility would burn fuel oil no more than 15 days per year, with a rolling average over any 10 years not to exceed 10 days per year. The worst anticipated condition for fuel oil firing would be five days per month in December, January, and February based on historical constraints on natural gas supply. During constrained periods, natural gas service could be interrupted to meet the increased demand of customers with non-interruptible service. The frequency and duration of natural gas constraints would determine the frequency and duration of natural gas service

2 In its final briefing to the Energy Facility Site Evaluation Council (September 5, 2000) the applicant proposed to reduce the diesel storage tank size to 1.5 million gallons. The environmental impact of this proposed design modification has not been analyzed in this FEIS. Using a smaller tank would increase the number of trips required for refilling of the tank during extended periods of oil firing. The exact impacts have not been analyzed.

interruptions to the S2GF. Historically, natural gas has been curtailed fewer than 15 days per year, with no interruption of the gas service in some years. Figure 3.10-6 illustrates the number of truck trips that would be required to maintain fuel reserves if the facility were to use fuel oil as a power source for five days within a 15 day period. It is anticipated that at peak load up to four trucks per hour would be required to replenish the fuel supply. Trucks from Canada would be routed from the truck entry at the border crossing via Bob Mitchell Way and Hesselgrave Road to the site. These roads are designated truck routes.

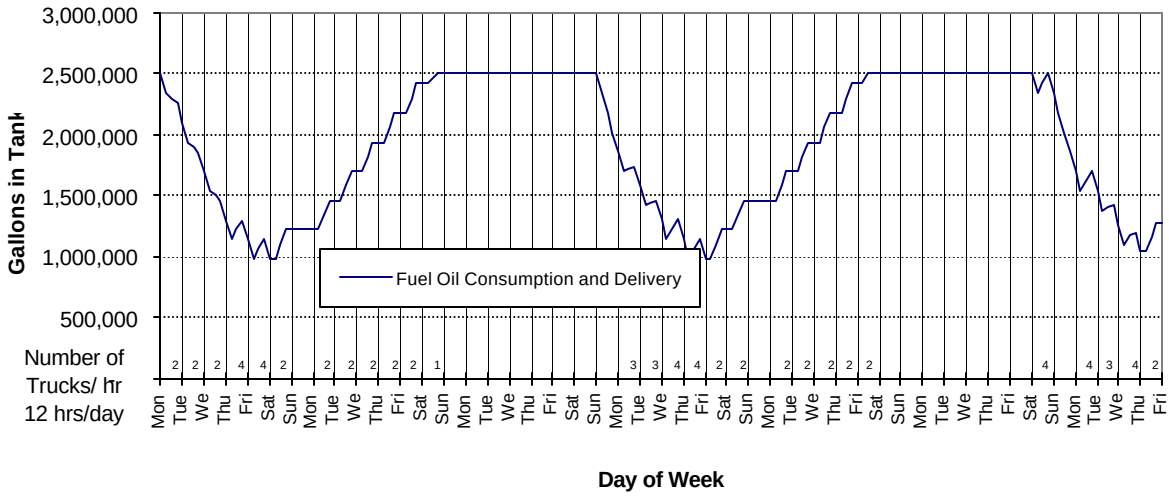
An alternative source of fuel oil is the ARCO refinery at Ferndale, Washington. Trucks delivering oil from this source would take one of two routes:

1. Trucks would leave the refinery and travel east on Grandview Road to enter southbound Interstate 5. They would exit the Interstate at Exit 262 and travel east on Axton Road 4 miles to SR 539 (Guide Meridian Road). They would then travel north on SR 539 to cross the Canadian border at Lynden; and then travel east on Canadian Highway 1A and Canadian Route 1 to Highway 13 at Abbotsford. The trucks would then turn south on Highway 13 to the U.S./Canada border, and access the site via Bob Mitchell Way and Hesselgrave Road.

2. Alternatively, from SR 539, the northbound trucks would turn east onto SR 546, which terminates at its intersection with SR 9, and travel on SR 9 to the site.

Established truck routes link all of the fuel sources with the project site. As shown in Figure 3.10-6 below, assuming a five consecutive day period of oil firing, the anticipated truck volume would be four trucks per hour during a 12-hour workday for up to two days. This worst case condition would be dependent upon weather and intermittent in nature. These deliveries would most likely take place during the winter months, and may coincide with severe weather conditions.

Figure 3.10-6: Fuel Oil Consumption and Replacement with 5 Days of Oil Firing Within a 15 Day Period



3.10.4 Environmental Impacts of No Action

Under the No Action Alternative the site would remain undeveloped. Traffic conditions would remain as described in the existing conditions section of this report with small increases in traffic volumes attributed to general growth in the area.

3.10.5 Mitigation Measures

3.10.5.1 Construction

It is recommended that during construction the contractor establish a program to:

- Monitor and clean adjacent road surfaces to prevent the accumulation of mud and other materials
- Provide temporary traffic controls during periods of heavy truck traffic
- Monitor worker parking demand to prevent spillover onto adjacent streets and provide a common area where those interested in forming carpools can post notices
- Provide additional offsite parking immediately if the 300-car lot is insufficient to meet needs.

3.10.5.2 Operation

No mitigation has been identified. Deliveries of fuel oil would most likely take place during the winter months, and may coincide with severe weather conditions.

3.10.6 Cumulative Impacts

No other planned projects were identified that would contribute to cumulative impacts. This project, during the operation phase, would contribute only minor amounts of traffic and would have a minor cumulative effect on the surrounding area, except during winter oil tank refilling episodes, when traffic volumes would increase substantially.

3.10.7 Significant Unavoidable Adverse Impacts

There are no significant unavoidable adverse impacts associated with the transportation element of the proposed project. Mitigation has not been identified for impacts associated with delivery of fuel oil during periods of severe weather conditions.