



Transportation
Consultants

December 3, 2010

Dry Creek Valley Association (DCVA) Board of Directors
P.O. Box 1221
Healdsburg, CA 95448

Subject: Peer Review of Seaton Winery Traffic Study

Dear DCVA Board:

TJKM Transportation Consultants is pleased to present our results for the subject peer review. We understand that the Dry Creek Valley Association (DCVA) has concerns over sub-standard roadway features of West Dry Creek Road, especially the segment serving several previously approved winery sites within a 1/2 mile of the proposed Seaton winery. DCVA is also concerned that the traffic impact study did not assess cumulative impacts from anticipated development in the area within the context of the existing 14-17 foot roadway with multiple vertical and horizontal curves. A more specific concern is that the traffic study's cumulative year analysis focused on winery operation trip generation, but did not include a local winery hosted event component or a worst-case analysis of traffic generated by an industry-wide special event. The purpose of this letter report is to enumerate the technical findings of TJKM's peer review of this traffic study as they relate to the above DCVA concerns.

PRMD Use Permit Response dated October 13, 2009 – Traffic-Related Items

TJKM reviewed the subject Sonoma County Permit and Resource Management (PRMD) letter responding to the initial Use Permit application by Mr. Hugh Seaton. The PRMD response letter required that certain analyses be included in the Seaton traffic impact study prepared by TCE and dated February 13, 2010. The PRMD letter states "Specifically, the concern about traffic relates to the cumulative impacts with the project and other nearby wineries and tasting rooms... In order to assess cumulative impacts, projected daily traffic volumes with the project and existing and anticipated development within the area, including turning movements, must be assessed. Potential impacts related to special event weekends, such as Passport to Dry Creek Valley must be included."

The TCE focused traffic impact study did not adequately assess cumulative impacts, the November traffic counts that were collected have under-represented the existing baseline traffic, and the traffic analysis relied on standards more appropriate for a 22-foot wide County rural collector than the existing West Dry Creek Road. Near the project site, the roadway varies from only 14-17 feet in width and also consists of substandard horizontal and vertical curves. The Seaton traffic study did not address the following issues required by PRMD:

- A traffic analysis of intersection turning movement counts was not provided for either existing or projected area development conditions. In traffic analysis, intersections are the most constrained facility type in terms of traffic capacity. This is in part due to traffic controls (e.g. stop signs or traffic signals) which assign vehicle right of way. In particular, the West Dry Creek Road intersections with Yoakim Bridge Road and Lambert Bridge Road would be affected by Seaton winery traffic since they provide cross-valley access from Dry Creek Road. By contrast, the Seaton traffic study only analyzed potential traffic impacts to the local roadway segment of West Dry Creek Road adjacent to the project site. Because intersection impacts due to Seaton project traffic have not been analyzed, it is not possible to ascertain the full potential traffic impacts of the Seaton project. Added Seaton project traffic would lead to increased vehicle delay and LOS at the above

Pleasanton
3875 Hopyard Road
Suite 200
Pleasanton, CA
94588-8526
925.463.0611
925.463.3690 fax

Fresno
516 W. Shaw Avenue
Suite 200
Fresno, CA
93704-2515
559.325.7530
559.221.4940 fax

Sacramento
980 Ninth Street
16th Floor
Sacramento, CA
95814-2736
916.449.9095

Santa Rosa
1400 N. Dutton Avenue
Suite 21
Santa Rosa, CA
95401-4643
707.575.5800
707.575.5888 fax

tjkm@tjkm.com
www.tjkm.com

intersections, and as a result may create other significant impacts not accounted for in the Seaton traffic analysis.

- The Seaton traffic study did not analyze potential traffic impacts related to special event weekends, including the Passport to Dry Creek Valley in April. The next special event weekend is Barrel Tasting in March, with certain weekends in March experiencing the highest traffic volumes. The traffic analysis presented was based on existing traffic counts taken in the month of November, which is generally a low-traffic month for the Dry Creek Valley's wine industry. In TJKM's winery traffic study experience as well as the Dry Creek Valley Association (DCVA), the month of March experiences the highest traffic due to industry-wide special events. Adding traffic from the proposed Seaton winery to November counts therefore does not constitute a worst-case scenario. As a result, the full potential traffic impacts of the Seaton project cannot be ascertained and may be more significant than reported.
- The Seaton traffic study did not use standards for determining adequate sight distance for the proposed project driveway as directed by PRMD. PRMD required use of AASHTO driveway standards. Rather, the Seaton study determined adequacy of sight distance using the Caltrans Highway Design Manual. Furthermore, the sight distance evaluation was improperly based on an advisory speed limit, rather than an actual field survey of prevailing speeds on West Dry Creek Road in the project vicinity. Because County design standards were not referenced, it cannot be reasonably concluded whether there is adequate sight distance serving the proposed Seaton project driveway.

Peer Review Findings for of Seaton Winery Traffic Study

TJKM offers the following technical comments relative to the Seaton traffic study. Specific points are addressed by traffic study section as follows:

Collision History

- Based on TJKM analysis of available Statewide Integrated Traffic Records System (SWITRS) collision data for West Dry Creek Road between Yoakim Bridge Road and Lambert Bridge Road, it appears that the Seaton study has underreported vehicle collisions on West Dry Creek Road. TJKM findings for the same 2003 to 2009 analysis period used in the Seaton study indicate that there were 10 collisions, including two head-on collisions and three side-swipe collisions. The Seaton study, on the other hand, found zero collisions on the same roadway segment during the same analysis period.
- The Seaton study determined a collision rate of zero for the roadway based on zero collisions and the collected November traffic counts. As a result, the Seaton study's collision rate estimate is likely underestimating current safety conditions along the roadway. If TJKM collision data and traffic estimates were used, a higher calculated collision rate would result. Furthermore, the study conclusion that the West Dry Creek Road collision rate is lower than the statewide average for similar rural roadways cannot be verified based on the data used.

Level of Service Methodology

- The Seaton study used the Highway Capacity Manual 2000 (HCM 2000) level of service (LOS) methodology for Class II Rural Roadways. The traffic analysis using this methodology assumed a 17-foot roadway with no shoulders in the project vicinity (8 1/2-foot lanes per direction with no shoulders). TJKM has the following issues with using this methodology:

1. The HCM roadway analysis assumes an initial free flow speed of 25 miles per hour (mph), which is based on a warning sign advisory speed that does not represent a valid speed limit. The estimate of free flow speed for the methodology should instead be based on either a posted speed limit or valid engineering vehicle speed study.
 2. Adjustments to the above free flow speed assume a 17-foot wide roadway, while TJKM field measurements in the vicinity of the Seaton project driveway indicate that roadway widths actually vary and are as low as 14 feet just north of the existing Seaton residential driveway. It is therefore technically inappropriate to use this adjustment since West Dry Creek Road in the project vicinity since the effective roadway width is less than 17 feet.
- The traffic analysis does not analyze traffic conditions at critical intersections serving the project. Such intersections include West Dry Creek Road at Yoakim Bridge Road and Lambert Bridge Road, which would experience increased traffic levels from the project and as a result would experience increased vehicle delay and LOS. The added delay and LOS could lead to other significant impacts not accounted for in the Seaton traffic analysis.

Existing Conditions

- The Seaton study describes the approximately four-mile long segment of West Dry Creek Road between Lambert Bridge Road and Yoakim Bridge Road as having a posted speed limit of 25 miles per hour (mph). The study further states that these posted speeds are indicated by signs installed at either end of this segment. The sign on the Lambert Bridge Road end of the segment is shown in Photo 1, which shows that the 25 mph posted speed is not a regulatory speed limit, but actually an advisory speed (black legend on yellow sign background) that supplements a warning sign (Winding Road Ahead) and as such has no direct enforcement value. The same is true of the sign installed at the Yoakim Bridge Road end of this roadway segment.



Photo 1: Posted Advisory Speed of 25 MPH just north of Lambert Bridge Road intersection (note posted speed does not establish roadway speed limit)

Based on TJKM field review, the four-mile segment of West Dry Creek Road does not include any regulatory speed signs (shown as black legend on white background). In the absence of such signs and without official action by the Sonoma County Board of Supervisors, the assumed maximum speed limit on this segment of West Dry Creek Road per California Vehicle Code (CVC) Section 22349 (b) is 55 mph. The CVC further states that this maximum speed limit may be reduced to as low as 25 mph on the basis of an engineering and traffic survey (CVC 22358). A speed limit can be further reduced to 20 or 15 mph (CVC 22358.3) for roads less than 25 feet wide, which includes this roadway segment. However, any such speed limit actions can only be done by official action of the County Board of Supervisors. An advisory sign of 25 mph does not meet these requirements and should not be used as a basis for a traffic and sight distance analysis.

TJKM general observations indicate that prevailing speeds on West Dry Creek Road in the project vicinity may be higher than 25 mph. However, prevailing speeds ought to be confirmed by conducting a valid engineering and traffic survey (E&TS) as prescribed in the California Manual on Uniform Traffic Control Devices (MUTCD). Until this is done, neither the prevailing speed of West Dry Creek Road nor the accuracy of the traffic analysis which uses speed as a basis can be confirmed.

- The Seaton study traffic counts were collected in the month of November, which is a low-traffic volume month for the Dry Creek wine industry. The Seaton traffic study observed 444 total daily vehicles on West Dry Creek Road in the vicinity of the project site during a November Saturday. Saturdays typically represent the highest traffic volumes on West Dry Creek Road during a typical week. However, TJKM also collected counts on Saturday, October 9, 2010 and found a total of 619 daily vehicles using West Dry Creek Road, which is 39 percent higher than the comparable Seaton study Saturday traffic counts.

Because the Seaton study Saturday traffic counts were taken during a low-traffic volume month (November), the study is underestimating the baseline Existing Conditions LOS that is used as a basis of comparison for all subsequent traffic scenarios. Furthermore, even though TJKM's October traffic volume observations were found to be higher than those in the Seaton study, the October volumes do not represent the busiest winery activity month of the year occurring in March, when there are industry-wide special events in the Dry Creek Valley.

Trip Generation

- The Seaton study has provided winery trip generation estimates relative to tasting room visitors and employees, administrative staff, and production employees. However, these project trip estimates only constitute activity on a non-event Saturday. Also, the estimates do not include estimates for either Seaton-only 24 hosted events, or the likely scenario that two or more approved wineries in this 1/2-mile segment would host events of 60 to 80 people on the same Saturday with vehicles converging in this sub-standard segment of roadway in a peak hour. In addition, no traffic analysis of industry-wide special events is provided. As such, the Seaton study is underestimating potential traffic generated by the proposed winery.
- The Seaton study does not provide a near term cumulative traffic analysis in which event traffic from anticipated development in the study area is added to Existing Conditions. The study therefore has underestimated potential near term cumulative impacts due to the proposed project.

Site Access

- TJKM field review of sight distance verifies the minimum 200 feet of sight distance available looking north or south from the proposed driveway. However, this determination is based on a typical roadway wide enough for two vehicles to pass one another and also level grade. As shown in Photos 2 and 3 below (taken from the existing Seaton residential driveway), roadway widths in particular are less than the 17 feet assumed in the Seaton study. In particular, the width of the roadway just behind the vehicle in Photo 2 is approximately 14 feet.

Perhaps more critical, there is a vertical curve located behind the vehicle in Photo 2, indicating a downgrade for vehicles approaching the project driveway from the north. This downgrade condition should be accounted for in the sight distance evaluation; however, the Seaton study assumes only a level terrain. The standard engineering reference *AASHTO Green Book* provides guidance for calculating sight distance on downgrades. On downgrades, greater stopping sight distance would normally be required than on level terrain. As a result, the Seaton study assumption of 150 feet of sight distance at 25 mph underestimates available sight distance at the project driveway, particularly to the north, assuming that 25 mph is the prevailing speed (which cannot be confirmed without a valid speed survey). Furthermore, the Seaton study's use of the Caltrans Highway Design Manual is inconsistent with PRMD's direction to use AASHTO standards for sight distance. The study therefore did not properly analyze the adequacy of sight distance at the project driveway.



Photo 2: Looking on West Dry Creek Road towards the north from existing Seaton driveway (note limited visibility due to horizontal and vertical curves on roadway)



Photo 3: Looking on West Dry Creek Road towards the south from existing Seaton driveway (note vehicle taking center of roadway due to substandard width)

Left-Turn Lane Analysis

- The Seaton study left-turn lane warrant analysis was based on weekday p.m. peak hour traffic volumes, not the worst-case Saturday peak hour volumes of the traffic study.
- The left-turn lane analysis is based on November traffic counts, not counts from higher-traffic months with industry special events. Since the analysis was not based on worst-case traffic during special event months on Saturdays, the study has not fully taken into account potential impacts from project traffic that would require a left turn lane to serve the project driveway.
- If a left turn lane is warranted based on a worst-case analysis related to Saturday special events, even then the left turn lane may not be feasible, given that the roadway ranges from 14-20 feet in the vicinity of the project driveway. Assuming an absolute minimum of 9-foot lanes, this would require 27 feet of roadway width (nine feet each to accommodate a left turn lane plus two standard travel lanes (one per direction)). This would require roadway widening that has not been proposed by the study and nonetheless may be infeasible due to steep shoulder drop offs, especially south of the project driveway.

Cumulative Conditions

- To estimate a year 2035 cumulative weekend traffic condition for West Dry Creek Road, the Seaton study has estimated annual growth in traffic of 1.5 percent. The study assumed

the existing Goepfrich Winery and proposed Williamson and Standley Wineries located within a 1/2 mile of the Seaton site are completed.

However, use of this annual growth rate in the study is not conclusive in terms of potential cumulative impacts from the three nearby wineries listed above, as well as the proposed Seaton winery. The study is inconclusive because the 2035 traffic estimates are apparently factored up from the non-peak month November traffic counts collected for Existing Conditions.

- The study is also inconclusive with respect to the effects of special event traffic for all four above wineries in 2035. The study traffic analysis shows an increase in Saturday peak hour traffic on West Dry Creek Road from 69 vehicles under Existing Conditions to 98 vehicles in 2035. This increase of 29 vehicles appears to be an increase in baseline traffic only and thus is likely to be far less than would actually occur when Seaton and another winery within a 1/2-mile radius held simultaneous hosted events, and significantly less than would occur during an industry-wide special event.

According to discussions with DCVA, a typical March special event such as Barrel Tasting could attract 4,200 visitors on a Saturday on West Dry Creek Road. Assuming the Seaton study vehicle occupancy factor of 2.5 persons per vehicle, up to 1,680 vehicles could use West Dry Creek Road, or approximately 210 vehicles per hour assuming an equal distribution over eight hours of a typical winery operation. In reality, during the core afternoon hours when winery visitor activity is highest, hourly volumes are likely to be higher than 210 vehicles. The Seaton study has not factored the potential for higher special event traffic levels into the 2035 baseline analysis and as a result has underestimated 2035 traffic conditions on West Dry Creek Road. These preliminary estimates can be verified at the next opportunity, by conducting a traffic analysis during the special event month of March 2011.

- The Seaton study also does not analyze the potential traffic impacts relative to overlapping weekend special events hosted by the four future local wineries, including private tasting events and weddings, that could occur. The 29-vehicle increase mentioned above could not by definition take such a situation into account. In the likely scenario of two of these wineries hosting a 60-person and 80-person event, 140 persons (56 vehicles assuming 2.5 persons per vehicle occupancy) could converge on the 1/2-mile segment of West Dry Creek Road serving these wineries over the course of a single peak hour (e.g. 12:00 -1:00 p.m., when these types of special events are likely to start). This could create an impact in part because the roadway segment in some locations is effectively a single lane wide (as low as 12-14 feet).

TJKM notes that the above scenario is a real possibility given that the Seaton use permit proposes up to 24 special events annually between April and September, on top of participation in eight annual industry-wide special events.

Other Issues

- Bicycle counts and analysis were not included in the Seaton traffic study. West Dry Creek Road is a popular route for recreational cyclists and bicycle tours, particularly on weekends. The roadway also hosts a number of annual competitive cycling events such as Santa Rosa Century and Ironman, which can attract up to 2,500 participants. On a roadway with widths as low as 12 to 14 feet, bicycles, whether solo or in groups, can slow trailing vehicular traffic and also reduce the effective width available to autos and trucks.

These factors may lead to unsafe conditions on the roadway, promoting unsafe passing maneuvers as trailing autos become impatient when following slower bicyclists. In addition, with the condition of autos trailing bicyclists, this also leads to a worse LOS for autos than would be otherwise found if no bicyclists used West Dry Creek Road. The Seaton study did not factor these safety and reduced LOS traffic issues with respect to bicycles into the analysis, and therefore is likely reporting a better roadway LOS than is occurring in reality.

- There are approximately ten (10) locations with sharp horizontal curves (some at 90 degrees with 20 mph advisory speeds) and/or vertical curves with limited visibility for opposing vehicles. Some of these vertical curves occur on hill crests in which roadway widths are less than the 17 feet assumed in the Seaton traffic analysis. The combination of horizontal / vertical curves with substandard widths (less than the 22-foot width specified for Rural Minor Collectors by Sonoma County) would require mitigation to correct such deficiencies prior to project opening, but no such mitigations are identified in the Seaton study. The main goal for such mitigations would be to reduce the potential for auto and bicycle collisions and improve overall traffic flow and safety along West Dry Creek Road.

AASHTO minimum safe stopping sight distance standards assume an approximately 18-foot road width with 2 feet for shoulders on each side. However, some of the above roadway curves include roadway widths of 14 feet or less with no shoulders. Examples of deficient vertical / horizontal curves include the vertical crest curve adjacent to the existing Seaton residential driveway (Photo 2) and the vertical sag curve adjacent to Williamson Vineyards shown in Photo 4.



Photo 4: Looking on West Dry Creek Road towards the south and approaching Williamson Vineyards (note trees on left in advance of Williamson driveway reducing effective roadway width to 12 feet)

In the case of the approach to the Seaton driveway (Photo 2), the roadway width at the vertical crest is estimated to be only 14 feet. TJKM measurements indicate that sight distance from the vertical curve southerly to the existing Seaton residential driveway is

approximately 130 feet. This distance would not meet AASHTO design sight distance standards at 25 mph (155 feet). However, because the roadway is 14 feet wide, even this standard would be inadequate in assessing available sight distance. The reason is that at this roadway width, opposing vehicles are effectively approaching each other in the same lane. A better measure would be adding the 25 mph stopping sight distance for *both* vehicles, because they both must stop in time to avoid a head on collision. The 155 feet needed for 25 mph would thus be doubled to 310 feet if two lanes were not available for the vehicles to pass by each other without colliding. This 310 feet distance is far more sight distance than is available at this and other narrow curves along West Dry Creek Road.

As a result, mitigation would be required at these substandard curves, which could be in the form of widening the road (including shoulders), reconstruction to lower the vertical crest curve for improved visibility, removing obstacles obscuring sight distance (such as trees), adding a centerline stripe, or perhaps other strategies in lieu of physical roadway reconstruction. Centerline striping alone would mitigate the curves along the roadway that are at least 18 feet wide, but for roadways less than 18 feet wide, a combination of the above mitigation strategies would be necessary.

Summary of Findings

TJKM has conducted a peer review of the TCE traffic impact study prepared for the proposed Seaton winery and has found the following:

- The Seaton study did not follow PRMD Use Permit requirements in that it did not include:
 - An intersection level of service (LOS) traffic analysis
 - Analysis of special event weekends such as Passport to Dry Creek Valley
 - Analysis of sight distance consistent with AASHTO guidelines and standards
- The Seaton study uses a roadway traffic analysis methodology that relies on a 25 mph speed and 17-foot roadway width, when the actual speed has not been field verified and measured width near the project driveway is as low as 14 feet.
- The traffic analysis does not analyze potential project traffic impacts at critical intersections that will serve the project, including the West Dry Creek Road intersections at Yoakim Bridge Road and Lambert Bridge Road.
- The study characterizes the prevailing speed of the roadway as 25 mph, which based on TJKM review is neither based on a posted speed limit nor a valid field vehicle speed survey. In the absence of a posted speed limit, the California Vehicle Code (CVC) considers the speed limit of the roadway to be 55 mph unless a regulatory change is made by the Board of Supervisors.
- Baseline existing traffic counts were taken in the month of November, which is a low-traffic volume month for the Dry Creek wine industry. These baseline counts were used to estimate near-term and long-term (Year 2035) project impacts. Since the counts were not taken during a peak special event month such as March, the traffic analysis as a result does not estimate a worst-case scenario and potential impacts may be understated.
- TJKM daily traffic counts on a Saturday in October 2010 were estimated at 39 percent higher than the comparable Seaton counts collected in November 2009.

- Seaton study trip generation estimates do not account for special events at the winery, either for Seaton-specific private events or estimates for industry-wide events such as the Passport to Dry Creek Valley.
- The Seaton study does not provide a near term cumulative traffic analysis in which event traffic from anticipated development in the study area is added to Existing Conditions. The study therefore has underestimated potential near term cumulative impacts due to the proposed project.
- The collision history of West Dry Creek Road from 2003-2009 appears to be have been underreported. While the Seaton study indicated no reported collisions between Yoakim Bridge Road and Lambert Bridge Road, TJKM evaluation of the statewide collision database for the same years revealed ten (10) collisions during that period. Therefore, the Seaton study's conclusion that the West Dry Creek Road collision rate is lower than the statewide average for similar rural roadways cannot be verified.
- The study sight distance evaluation assumes adequate roadway widths that are in fact substandard near the proposed Seaton project driveway. The actual width is as low as 14 feet, which effectively makes West Dry Creek Road a one-lane roadway and as a result would require greater sight distance along the roadway in the project vicinity.
- The sight distance evaluation assumes level terrain and does not account for downgrades.
- The warrant analysis for a left-turn pocket into the proposed Seaton driveway is based on weekday p.m. peak hour traffic volumes, rather than worst-case Saturday peak hour volumes. Also, the volumes do not take into account special events. If a revised left-turn pocket analysis based on Saturday special events found the need for a left-turn pocket, roadway widening would be required due to the existing 14-20 foot width of the roadway. The study does not propose any roadway widening or other improvements.
- The 2035 cumulative traffic analysis of local wineries (Seaton, Goepfrich, Williamson, and Standley) assumes a general 1.5 percent annual growth factor that does not take into account the cumulative effects of Saturday special event traffic. Furthermore, the 2035 baseline traffic volumes appear to be factored from the existing November counts, which do not represent a worst-case baseline.
- The 2035 Saturday peak hour analysis assumes an increase of 29 vehicles from Existing Conditions to 2035 Conditions with the Seaton project, which is likely to be far less than would actually occur when Seaton and another winery within a 1/2-mile radius held simultaneous hosted events, and significantly less than would occur during an industry-wide special event. Industry estimates for a March Saturday during Barrel Tasting could amount to 210 or more hourly vehicles using West Dry Creek Road. As a result, the Seaton study has underestimated traffic conditions on West Dry Creek Road for the 2035 baseline with respect to special events. These preliminary estimates can be verified at the next opportunity, by conducting a traffic analysis during the special event month of March 2011.
- The Seaton study also does not analyze the potential traffic impacts relative to overlapping weekend special events hosted by the four future local wineries, including private tasting events and weddings, that could occur. In the likely event of two of these wineries hosting

a 60-person and 80-person event, 140 persons (56 vehicles assuming 2.5 persons per vehicle occupancy) could converge on the 1/2-mile segment of West Dry Creek Road serving these wineries over the course of a single peak hour (e.g. 12:00 -1:00 p.m., when these types of special events are likely to start). This could create a potentially significant impact in part because the roadway segment in some locations is effectively a single lane wide (as low as 12-14 feet).

TJKM notes that the above scenario is a real possibility given that the Seaton use permit proposes up to 24 special events annually between April and September, on top of participation in eight annual industry-wide special events.

- Bicycle counts and analysis were not accounted for in the study, given the potential for congestion and safety conflicts with recreational cyclists, bicycle tours, and competitive races that use West Dry Creek Road.
- There are approximately ten (10) locations with sharp horizontal curves (some at 90 degrees with 20 mph advisory speeds) and/or vertical curves with limited visibility for opposing vehicles. Project traffic would add to these existing deficient conditions, yet no mitigations to correct them are proposed in the study.
- Mitigation would be required at many of the substandard curves, which could be in the form of roadway widening, lowering the vertical crest curve for improved visibility, removing obstacles obscuring sight distance (such as trees), adding a centerline stripe, or perhaps other strategies in lieu of physical roadway reconstruction.
- Since elements of roadway reconstruction may be environmentally and economically undesirable, such as road widening, slope cuts and fills, and tree removal, other mitigation strategies to address existing deficient roadway conditions may be to limit potential traffic added by the proposed project. This may take the form of holding special events over certain sizes at an off-site location, so as to limit the traffic generation potential at the project site during critical traffic periods.

We appreciate the opportunity to provide this peer review of the Seaton Winery traffic study in Sonoma County. If you have any questions concerning this evaluation, please call me at (925) 463-0611.

Sincerely,



Andrew R. Kluter, P.E.
Associate