

MONTEREY COUNTY REGIONAL FIRE DISTRICT



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Caltrans
District 5 Public Information Office
sr-68@dot.ca.gov

Re: Public comments on the Scenic Route 68 Corridor Improvement Project Draft
Environmental Impact Report/Environmental Assessment

To whom it may concern,

This communication sets forth the public comments of the Monterey County Regional Fire Protection District “**District**” of the Draft Environmental Impact Report/Environmental Assessment “**DEIR**” for the scenic route 68 corridor improvements project. On September 26, 2017 the Board of Directors of the Monterey County Regional Fire Protection District passed and adopted Resolution 2017-22 requesting the Monterey County State Highway 68 roundabout project be reviewed in accordance with the California environmental quality act in its determination of analyzing emergency response times. Resolution 2017-22 along with additional details and concerns were provided to Caltrans District 5, District Director, Timothy Gubbins in a letter dated November 24, 2017.

The District has reviewed the analysis provided in the DEIR and has two distinct issues that still need to be addressed. The first issue was the critical point in our 2017 comments regarding the issue of increased response time for first responders due to the roundabout features contemplated in Alternative #1. The second issue is the design of the roundabout itself at the Laureles Grade intersection. The current design impacts the District’s Laureles Fire Station access to the intersection and encroaches on the property owned by the District.

Response times degradation

The District has continued to express concerns about the increased response time due to the reduction of speeds required for our apparatus to navigate multiple roundabouts during an emergency response. Our direct experience has shown that even with the current conditions of Highway 68 during peak traffic periods, our responders see minimal decrease of response time with the use of red lights and sirens and the ability to control the traffic signals at the intersections with our preemptive signal control devices. These devices allow us to change the traffic signal in our favor to allow for traffic at the intersection to move through and pull out of the roadway. It appears that the roundabouts are being installed for morning and afternoon work

*Serving the Northern Salinas Valley, Highway 68 Corridor, Communities of Chualar,
East Garrison, Carmel Valley, Mid Carmel Valley & Santa Lucia Preserve*

week peak traffic periods to try and alleviate congestion. Unfortunately, these features will remain in place for all hours of the day, impacting the non-commute hours and weekends. Currently, during non-peak or overnight hours our apparatus can maintain highway speeds when responding through the various intersections by controlling the intersections with our preemptive priority and safe driving procedures. Unfortunately, with the installation of roundabouts we would be required to slow down to a speed of 10-15 mph to navigate the rather aggressive turn to get through each intersection. Once out of the feature, our apparatus will then need to accelerate back to highway speeds only to encounter another roundabout. We do respond in modern fire apparatus, however these vehicles are large, heavy and do not accelerate like passenger vehicles. We have conducted an internal time trial utilizing a standard roundabout model. It was found that the difference between a signalized intersection and roundabout in an off-peak scenario would add 32 seconds for each feature. Operationally, if the apparatus needs to make a left turn off of Highway 68, that too delays the response by an additional 8 seconds as the apparatus must enter and travel 270 degrees to make the turn. The District believes that the installation of roundabouts will negatively impact emergency response to the incidents along the Highway 68 corridor which already realize longer response times due to the rural nature of the locations.

The following comments are provided to request additional mitigations or enhanced language in the provisions of the DEIR.

- **Page ix, Summary, Utilities and Emergency Services.** The District has provided comments in the next bullet addressing the actual Section 2.1.8 Utilities and Emergency Services language and provisions.
- **The following sections have the exact language within the paragraphs of the sections. The District's comments are provided for all sections that include this language.**
 - **Page 146, Section 2.1.8 Utilities and Emergency Services *Environmental Consequences* paragraphs 2-4.**
 - **Page 390, Section 3.2.17 Transportation, d).**
 - *As a result of reductions to current intersection delays and improved travel time reliability through the corridor, improved access for emergency services is anticipated to occur under both Build Alternatives.* The District struggles to understand how in Alternative 1 there is not a significant impact based solely on the delay of our response times to the Highway 68 corridor and adjacent communities.
 - *Alternative 1 would include a roundabout design that provides sufficient lane width to allow for other vehicles to move aside for emergency vehicles passing through the intersection. Curbs in the roundabout would be designed to be traversable by emergency vehicles.* Based on the designs currently presented on the project webpage, it does not appear to us that the dimensions of the features allow for the maneuverability for our fire apparatus and other larger vehicles within the roundabout feature.
 - *Alternative 2 would include signal prioritization features that would alter the signal to provide priority access for emergency vehicles through signalized intersections.* The District is comfortable with this alternative as this mimics the current design while providing signal control to our responding units and more space at each intersection. Alternative 2 provides options for navigation of both regular highway vehicles and emergency vehicles without physical limiting features being installed.

- During the Plans, Specifications, and Estimates (project final Design) phase of the project, design of the intersection would be further refined to best accommodate emergency vehicles. The District feels that these details need to be worked out during this phase of the project as a different design (larger footprint of the feature) may impact other areas (biological, property rights, etc.) that will have to be mitigated or addressed.
 - The Build Alternatives would not permanently alter planned routes for emergency responses or evacuations. Therefore, no long-term impacts to emergency services are expected from the project. The District has shown that there are significant impacts to emergency response with a degradation of response times and that the roundabouts contemplated in Alternative 1 permanently alter planned routes for emergency responses and evacuations. We do agree that Alternative 2 would have less impact on the emergency response as this alternative does not include any permanent traffic calming features. Section 2.1.8 has a concluding paragraph titled Avoidance, Minimization, and/or Mitigation Measures. This paragraph states, since the implementation of the project would not have adverse effects on utilities and emergency services, no avoidance or minimization measures are proposed. The District does not feel that this is an accurate statement. Alternative 1 does have adverse effects on emergency services particularly response time degradation to the Highway 68 corridor and adjacent communities. This needs to be acknowledged and avoidance or mitigation measures should be identified and discussed.
- **Page 382, Section 3.2.9 Hazardous Materials, f).** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? No Impact—Once completed, the project would improve highway operations within the project limits and thereby improve emergency access and evacuation. The District has shown that there are significant impacts to emergency response with a degradation of response times and that the roundabouts contemplated in Alternative 1 permanently alter planned routes for emergency responses and evacuations. We do agree that Alternative 2 would have less impact on the emergency response as this alternative does not include any permanent traffic calming features.
- **Page 393, Section 3.2.20 Wildfire, a).** Substantially impair an adopted emergency response plan or emergency evacuation plan? Less Than Significant Impact—Once completed, the project would improve highway operations within the project limits and thereby improve emergency access and evacuation. The District has shown that there are significant impacts to emergency response with a degradation of response times and that the roundabouts contemplated in Alternative 1 permanently alter planned routes for emergency responses and evacuations. We do agree that Alternative 2 would have less impact on the emergency response as this alternative does not include any permanent traffic calming features.
- **Page 393, Section 3.2.20 Wildfire, c).** Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? No Impact--No additional infrastructure is being installed that would increase fire risk. The District has shown that there are significant impacts to emergency response with a degradation of response times and that the

roundabouts contemplated in Alternative 1 permanently alter planned routes for emergency responses and evacuations. We do agree that Alternative 2 would have less impact on the emergency response as this alternative does not include any permanent traffic calming features.

- **Page 404, Section 3.2.23 Wildfire, Environmental Consequences, Alternative 1.** Research data on roundabout performance during emergency evacuations is limited. However, limited research data and assessments of evacuations indicate that roundabouts do not impede emergency evacuation and may facilitate safer evacuation. There is no research supporting the various published opinion statements that roundabouts impede emergency evacuations. Taking into consideration the available research data, the roundabouts would not impede emergency evacuation efforts over signalized intersections. The operation of roundabouts is considered more reliable because roundabouts do not require functioning signal lights, sensors, or electronic timing to function and will continue to operate as designed during a power outage. Studies have shown that modern roundabout design allows for fire engines and other large equipment to travel (at slower speeds) unimpeded through properly sized and engineered roundabouts. Some “training” of the public on how to properly move through a roundabout to make way for emergency vehicles may be necessary. Scenic route 68 is considered a primary evacuation route for the many adjacent communities along the corridor and supports numerous collector and neighborhood streets and roads to either the Monterey Peninsula or the City of Salinas. The District is concerned that Alternative 1 with the nine contemplated roundabouts would not only delay the emergency response for public safety agencies but also compromise the flow of traffic and route flexibility in the event of an emergency evacuation. The same concerns are not present with Alternative 2 or current existing conditions.
- **Page 404, Section 3.2.23 Wildfire, Avoidance, Minimization, and/or Mitigation Measures, Alternative 1.** Design considerations were made to ensure accommodation of large vehicles through the roundabouts, including mountable aprons and curbs in the central island intended for use by large vehicles and wider entry and exit lanes for efficient movement into and out of the roundabout. Based on the designs currently presented on the project webpage, it does not appear to us that the dimensions of the features allow for the maneuverability for our fire apparatus and other larger vehicles within the roundabout feature.

Laureles Fire Station

The District’s Laureles Fire Station is located at the intersection of Highway 68 and Laureles Grade. This station, originally built in 1990, services the Highway 68 corridor and adjacent communities from the Torero Drive intersection to the Olmstead Road intersection. The station’s main access and egress for emergency vehicles is on the west side of the parcel onto Laureles Grade. Staff and visitor access the property from a driveway off of Seca Place. The cut through behind the station is utilized only for servicing the station and District access. In 2008, Cal Trans entered into an agreement with the District to acquire a portion of the fire station parcel to accommodate the Highway 68/Laureles Grade traffic improvement project. This improvement allowed for the second left turn lane off of Highway 68 onto Laureles Grade Road and defined a right turn lane off of Laureles Grade Road onto Highway 68. The DEIR contemplates additional land on the same corner that was acquired in 2008 to facilitate the installation of the roundabout. The District does not support this design or any additional acquisition or easement onto the fire station parcel as the impacts to the daily work paths and functionality of the station would be

compromised. The District would be in support of a relocation of the station across Highway 68 into the lower Laguna Seca property to alleviate project impacts potentially repurposing the existing fire station. This cost would be borne by the project.

We have analyzed the contemplated design and have the following concerns regarding emergency vehicle movement gaining access and egress from the station for routine and emergency incidents. Accessing Highway 68 eastbound appears to utilize a semi protected right turn lane that will have to merge into through east bound Highway 68 traffic. This maneuver is similar to current conditions without the traffic signal to allow for entry onto the road. Our apparatus are big and modern but lacks the acceleration of passenger vehicles. Without the signal to stop through traffic, larger vehicles could experience trouble with merging into the east bound lane. This was observed at the new roundabout at Highway 156 and Highway 25. Large trucks were unable to enter the roundabout in the natural flow for traffic as passenger vehicles sped through the entry chicane closing the gap. The roundabout stalled traffic due to the large trucks unable to enter the roadway. Similarly, accessing Highway 68 westbound would have our fire apparatus cross the semi protected right turn lane onto eastbound Highway 68, traverse either a raised island or shared path, squeeze into a narrowed left turn path to then cross the eastbound thru traffic lane, and quickly encounter westbound through traffic which should yield to our travel path. At this point, any realized conflicts would expose the rear of our vehicle to eastbound through traffic. Departing the station to access southbound Laureles Grade would require our apparatus to cross the semi protected right turn eastbound lane, the narrowed left turn westbound lane, a raised island or shared path into a left turn lane to merge into southbound Laureles Grade Road. These are all very complex movements in a large vehicle lacking the acceleration and maneuverability of a passenger vehicle. Compound the situation with code three lights and sirens during peak traffic congestion and the results could be problematic. Considerations need to take these scenarios into consideration and collaboration with District staff to identify and work through mitigations is requested.

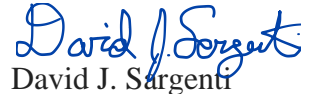
The following comments are provided to request additional mitigations or enhanced language in the provisions of the DEIR.

- **Page 135, Section 2.1.6 Relocations and Real Property Acquisition, Environmental Consequences, Laureles Grade Road.** *A minor amount (about 2 percent) of the County Fire District property at the southeast corner for Laureles Grade Road at State Route 68 would be required for the roundabout alternative intersection improvements. A temporary construction easement of 0.06 acres would also be necessary at this parcel for the roundabout alternative. All partial permanent acquisitions at Laureles Grade Road under Alternative 1 are not anticipated to affect continued use of the properties, and no structures are located within acquisition areas.* The District does not support this design or any additional acquisition or easement onto the fire station parcel as the impacts to the daily work paths and functionality of the station would be compromised. The District would be in support of a relocation of the station across Highway 68 into the lower Laguna Seca property to alleviate project impacts potentially repurposing the existing fire station. This cost would be borne by the project.
- **Page 388, Section 3.2.15 Public Services, CEQA Significance Determinations for Public Services.** *Fire Protection? No Impact--The project would not induce the need for any new or altered fire protection services.* If additional land acquisition of the fire station parcel cannot be avoided, the District would be in support of a relocation of the station across Highway 68 into the lower Laguna Seca property to alleviate project

impacts potentially repurposing the existing fire station. This cost would be borne by the project.

Thank you for the opportunity to provide comments on the DEIR. If there are any questions or clarifications required, I can be reached by email dsargenti@mcrfd.org or phone at 831-455-1828.

Sincerely,



David J. Sargenti
Fire Chief

cc. Monterey County Regional Fire District Board of Directors
Todd Muck, Executive Director, TAMC