

March 5, 2013

Ms. Linda Novick  
Harvest Power  
6943 N. Golden State Blvd.  
Fresno, CA 93722

Dear Ms. Novick,

We have reviewed the administrative draft sections of the EIR that pertain to traffic and the two traffic impact studies prepared by TPG Consulting for the Harvest Power project in Tulare County. That review has led to the following conclusions.

The original Traffic Impact Study was prepared in July 2012 and evaluated the increase in the site's permitted processing tonnage from 86,000 tons per year to 216,000 tons per year. That evaluation assumed the following trip generation profile for the additional activities associated with the expansion of the existing operation. These were estimated new trips to be generated by the expanded activities.

*85 additional trucks per day from the delivery of the debris*  
*10 additional trucks per day from the material generated by the digester*  
*21 additional trucks per day from the removal of the material*  
*4 additional trucks per day from the existing CNG fueling facility*  
*120 additional trucks per day*  
*x 2 trips per truck (entering and exiting)*  
*240 additional truck trips per day*  
*9 employee trips per day = 3 new employees x 3 trips per day*  
*249 new project trips per day*  
*÷13 hours of operation per day*  
*19 trips per hour*

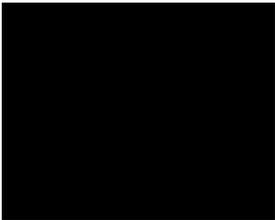
This trip generation profile is incorporated into the administrative draft of the EIR. This represents a conservative approach to the estimation of the new trips that will be added as a result of the expansion of the Project.

After consultation with the Applicant, a second Traffic Impact Study was prepared in November 2012 to reflect a more realistic level of new trips that can be expected from the site with the expansion of the Harvest Power Project.

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*35 additional trucks per day*  
*x 2 trips per truck (entering and exiting)*  
*70 additional truck trips per day*


$$\begin{aligned} & \frac{9 \text{ employee trips per day} = 3 \text{ new employees} \times 3 \text{ trips per day}}{79 \text{ new project trips per day}} \\ & \frac{\div 13 \text{ hours of operation per day}}{6 \text{ trips per hour}} \end{aligned}$$

While this approach may more closely reflect the actual traffic that will be generated by the Project, it was not used in the EIR so as to overstate the potential impacts from the Project.

The key for assessing impacts is the number of peak hour trips being added to the road network. With the more conservative approach, only 19 new peak hour trips are added, while with the more realistic approach, a mere 6 additional trips will be added. Neither the 19 or the smaller 6 trips represents significant increases to the existing or future traffic stream.

In either case, the conservative approach or the more realistic approach, level of service analysis was completed on the study intersections. Both analyses concluded that the resulting short term and long term impacts from the Harvest Project would not result in any significant level of service impacts. That is all study intersections or evaluated movements were projected to operate well above the threshold of significance established by both the County of Tulare (Lovers Lane) or Caltrans (State Highway 137).

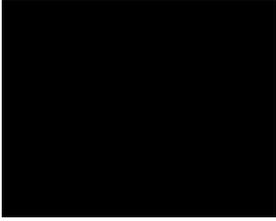
As part of the Staff review and ADEIR preparation, the Applicant has determined that for regulatory purposes and to reflect the fluctuations in the day to day operation, the maximum number of new trucks would not exceed 110 per day. Given that the July 2012 Traffic Impact Study was based on an assumed 120 trucks per day, the current estimated Project truck trips falls below the conservative methodology included in the ADEIR.

$$\begin{aligned} & 110 \text{ additional trucks per day} \\ & \frac{x 2 \text{ trips per truck (entering and exiting)}}{220 \text{ additional truck trips per day}} \\ & \frac{9 \text{ employee trips per day} = 3 \text{ new employees} \times 3 \text{ trips per day}}{229 \text{ new project trips per day}} \\ & \frac{\div 13 \text{ hours of operation per day}}{18 \text{ trips per hour}} \end{aligned}$$

This very slight reduction in trucks per day yield a drop from 19 new peak hour trips to 18 new peak hour trips to the Project site. Therefore, it can be reasonably concluded that since the overall peak hour trips is only 18 additional trips, the resulting levels of service at the study intersections will also operate well above the threshold of significance established by both the County of Tulare or Caltrans.

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Thank you for the opportunity to assist with this project. Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Charles Clouse, AICP, PTP  
Principal

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