

**Compatibility Analysis of CR 120 N Recommendations**  
**Table Version of GCC's 11-18-15 Proposal**

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	<b>CR 120 N Recommendations 8.28.15</b>	<b>GCC's Proposal</b>
Traffic	<ul style="list-style-type: none"> <li>Trucks shall be limited to 60 per day until the full depth reclamation of the first 2.6 miles from SH140 is completed and pavement is applied in front of the McCue and Hunzeker residences. During this time GCC Energy shall have the option to use CR119 for up to 40 trucks per day.               <ul style="list-style-type: none"> <li>Dust particulates shall be monitored and controlled until all the gravel sections are paved. Continuous air monitors should be installed at the McCue and Hunzeker residences to ensure the health and safety of each family.</li> <li>At mile marker 0.3 from SH 140, all existing culverts for the Big Stick Ditch shall be replaced, due to age, not merely extended.</li> <li>The new pavement texture/composition shall meet quieter pavement standards to assist with the mitigation of truck noise [the most common is Open Graded Friction Courses (OGFC)].</li> <li>No "rumble strips" shall be installed in the new pavement along CR120N.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Subject to the agreed terms of RIA between GCC Energy, LLC and La Plata County</li> <li>Dust along CR 120 will be controlled by normal maintenance practices and construction best practices</li> <li>Culverts were extended to accommodate the widening of the corner at MP 0.3.</li> <li>Quiet pavement options will be utilized wherever appropriate and subject to final design approval.</li> <li>There are no rumble strips anticipated</li> </ul>
	<ul style="list-style-type: none"> <li>Trucks shall be limited to 80 per day until paving, widening, and straightening is completed all the way to the mine. During this period GCC Energy shall have the option to use CR119 for up to 20 trucks per day.</li> </ul>	<ul style="list-style-type: none"> <li>Subject to the agreed terms of RIA between GCC Energy, LLC and La Plata County</li> </ul>
	<ul style="list-style-type: none"> <li>100 trucks per day shall be allowed (our livable cap) once the paving, widening and straightening is complete all the way to the mine.</li> <li>No further use of CR119 would be allowed.</li> <li>The County Engineer has indicated that easements would be required for much of this work to be completed. The Traffic Impact Study does not address the question of easements. <b>We would like clarity on when, how, and by whom, these easements would be acquired.</b></li> </ul>	<ul style="list-style-type: none"> <li>Mitigation measures will be adopted with the expectation truck traffic volumes up to approximately 150 loads per day on a 6-day per week average.</li> <li>CR 120 S will be used in cases of emergency</li> <li>Easement acquisition will follow normal procedures of identification, negotiation, eminent domain</li> </ul>
Traffic	<ul style="list-style-type: none"> <li>If GCC Energy feels it requires more than 100 trucks per day, then truck traffic should be dispersed; either by implementing a Loop or by utilizing CR119 and/or CR120S in addition to CR120N once these roads are brought up to the same standards as CR120N. The County should impose the same 100 trucks per day limit on these additional routes.</li> </ul>	<ul style="list-style-type: none"> <li>Traffic volume and routing will be subject to the agreed terms of the RIA between GCC Energy and LA Plata County</li> </ul>
	<ul style="list-style-type: none"> <li>Snow days - Additional trucks would be allowed on make-up days so long as trucks did not exceed 500 in any five-day period.</li> </ul>	<ul style="list-style-type: none"> <li>This requirement is in conflict with the stipulation of 100 trucks per day maximum and implicitly states that snow days cannot be made up.</li> </ul>
	<ul style="list-style-type: none"> <li>Hours of Operation - As the frequency table above illustrates, reduced hours of operation are a trade-off between Health (noise and sleep deprivation) and Safety (risk exposure). GCC is currently operating on a 24/6 schedule. We are willing to accept a reduced safety level, but only if all hauling occurs between 6 am - 10 pm Monday through Friday with no hauling on Saturdays and Sundays.</li> </ul>	<ul style="list-style-type: none"> <li>Subject to the agreed terms of RIA between GCC Energy, LLC and La Plata County</li> <li>Traffic volume between the hours of 10:00 PM and 6:00 AM are already reduced from daytime trucking.</li> <li>Any reduction in hours of operation must be accompanied by greater flexibility in average and maximum truck counts.</li> </ul>
Speed Limits and Signage	<ul style="list-style-type: none"> <li>Reduced speed limits are desirable, but they need to be enforced. We believe that installing GPS systems on the haul trucks for monitoring and documenting speed and trip timing would be preferable to the measures GCC has proposed.</li> </ul>	<ul style="list-style-type: none"> <li>GPS monitoring is in use but will trigger when truck speed exceeds 5mph above posted speed limit. In many areas, GCC truck speed policies are more strict than posted speed limits. Use of GPS monitoring does not produce the desired level of adherence to speeds. GCC has obtained good results by increasing the number and location of random monitoring and enforcement, and will continue to improve upon current practice.</li> </ul>
	<ul style="list-style-type: none"> <li>Signage is useful for informing drivers who rarely travel a road of potential problems. However, they have little impact on drivers who make multiple trips on the same road day after day. We believe that an active warning system should be installed on the hill so that drivers attempting to enter CR120N from Hidden Ranch, Cougar Mesa, and the other residences on the hill would have warning of an approaching truck</li> </ul>	<ul style="list-style-type: none"> <li>GCC may agree to assist in the installation of warning signs in accordance with the requirements of the La Plata County. GCC does not authority over the road and as such cannot voluntarily install warning signs without appropriate authorization.</li> </ul>

	that it is impossible to see. Signage may include, but is not limited to, lower truck speed limits, 9% grade, hidden driveways, jake brakes strictly prohibited, no passing zone, curve, bus stop	
	<ul style="list-style-type: none"> <li>• GCC Energy's "How's My Driving" phone number should be posted on the haul trucks as well as on road signs.</li> <li>• Employees should be encouraged to carpool</li> </ul>	<ul style="list-style-type: none"> <li>• Many of the truck and trailers used on the coal haul are also used in other, unrelated business.</li> <li>• Employees are encouraged to carpool, and many do carpool.</li> </ul>

Note – GCC responded to a 10.8.15 “alternatives approach” document provided to the PC, and those comments are shown below. The 8.28.15 CR 120 N letter, however, is the document that contains compatibility recommendations.