

Information Request – 2/7/19

1.0 Work Hours, Days and Weather Delays

Condition B.9. All construction activity on the Property shall be limited to the following:

*a. All clearing, grading, and construction of the Property shall be limited to **between** the hours of 7:00 a.m. **and** 7:00 p.m. Monday through Friday and **between** 8:00 a.m. **and** 6:00 p.m. Saturday ~~and Sunday...~~*

Regarding weather delays: Weather is one of the items that could cause a delay which is outside of the project's control. Other factors which could cause delays, or work stoppage scenarios for safety reasons are: fire, sabotage, lightning, earthquakes, floods, or even government shutdowns. Due to these potential events, sPower requests the following modifications regarding conditions around work hours and days.

"The zoning administrator may approve full construction work activities on Sunday's or extended hours upon request by the project. The request must provide the reason as to why the project had been delayed (such as the aforementioned weather fire, sabotage, lightning, earthquakes, floods, or even government shutdowns, etc.), the extent of the schedule delay, and request of extension of work hours and/or work on Sundays."

Additionally, it would be beneficial for the zoning administrator to have the ability to temporarily extend or adjust the start time of work hours. For example: during the summer months the ability to begin earlier in the morning reduces the amount of work performed during the hottest time of the day; alleviating worker health and safety concerns, reducing the number of required heat-stress and dehydration breaks, and therefore allowing for more work to be completed.

2.0 Road Design Standards

Condition D.6. Access road aggregate material shall be placed in accordance with the requirements of the applicable specifications governing the type of material or construction being used and shall be compacted at optimum moisture, within \pm two (2) percentage points of optimum per Appendix C of VDOT's Road & Bridge Specifications. These access roads shall further be designed and constructed to International Code Council Section 503 for adequate FREM access.

With respect to access roads specification sPower believes the road designs standards should be left to the engineer of record who will professionally certify the road design plans. This is the standard practice for Site Plan Approvals. Please consider the following modification to condition D.6: "Access road design shall consider FREM accessibility for rescue purposes and applicable aggregate material shall be placed in accordance with the requirements defined by the Engineer of Record for the project."

3.0 Construction Shuttling

B.2 The Applicant shall shuttle at least seventy percent (70%) of the workforce to and from the site during construction. Employees ride-sharing with a minimum of three (3) employees per vehicle may contribute to this requirement. Compliance with this requirement shall be demonstrated through the Applicant's monthly provision to the County of a transportation log which provides the following information: License Plate Number, Vehicle type (~~wideload~~Oversize Load, heavy delivery, delivery, shuttle, employee ~~HOV car~~vehicle carrying three (3) or more persons, employee ~~car~~vehicle carrying less than three (3) persons, guest, which is someone not related to the Project or its construction), Entry time, ~~and~~ Exit time. "Oversize Load" shall be defined as any vehicle that requires a Hauling Permit from the Virginia Department Motor Vehicles.

sPower finds the shuttling requirements of Condition B.2 to be unreasonable, burdensome, but mostly, unattainable based on current research on construction traffic control. Please note the study from the Federal Highway Administration (FHWA) that even for urban construction projects with a multitude of mass transit options were only able to achieve **8-27%** Single Occupancy Vehicle reduction.

Please note the following issues that sPower has with the shuttling condition:

- Shutting Condition will drastically slow down construction due to lost time and productivity on site, extending the construction time of the project.
- Variability of shift hours and having to re-coordinate the van/rideshare program every time shifts change will also cause confusion and delays.
- Increase in project costs and insurance liabilities for implementation of vanpool and shuttle programs. (Paying for employee time during busing or shuttling).
 - Hypothetical Project Impact Example: 500 workers x 250 work days x 1.5hrs per day commute x \$25/hr = \$4.6 million in wages alone.
 - This does not include the cost of the transportation and 750 hours per day of lost productivity on the job site which would multiply the impacts.
- Use of shuttles or vanpool creates challenges for employees that may have to leave the site due to an unexpected personal or family emergency, and taxis/uber/lyft may not be available in the job site area.
- Employees will be travelling from a wide distribution of areas, many of which may be rural in nature. This distribution makes carpooling more difficult as employees may be forced to travel long distances out of their way to match carpools.
- Buses are similar in size to tractor-trailer delivery trucks. Would these be subject to the same restrictions as material deliveries?
- There is little availability of parking lots to accommodate carpool/vanpool/shuttle services. Park-and-ride lots in the Fredericksburg area are already nearing capacity due to Washington, D.C. commuters, and private parking lot availability may be limited or unattainable through property owner agreements.

- sPower is not aware of any construction project in a rural location stipulated to rideshare, and would note that even in urban construction projects with access to multiple modes of mass transportation, attaining 25% ride sharing goals has been difficult.
 - FHWA Report – Known Effectiveness of TDM Strategies – suggest that TDM strategies in highly developed urban areas only achieve 8-27% SOV reduction (ie. a maximum of 37% ridesharing) <https://ops.fhwa.dot.gov/publications/fhwahop12035/chap10.htm>