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**AUG 27 2019**

**STATE CLEARINGHOUSE**

August 27, 2019

06-FRE-2018-00766

06-FRE-99-9.164

Draft Environmental Impact Report  
 (DEIR, SCH #2018061027)

Buford Oil Company Travel Center  
 Conditional Use Permit 17-03

**SENT VIAL EMAIL**

Ms. Dawn Marple, Contract City Planner  
 City of Fowler  
 Planning Department  
 128 5<sup>th</sup> Street  
 Fowler, CA 93625

Dear Ms. Marple:

Thank you for including Caltrans in the environmental review process for the Project referenced above. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

We provide these comments consistent with the State's smart mobility goals that support a vibrant economy and build communities. The following comments are based on the review of the Draft Environmental Impact Report (EIR) and its associated traffic impact study (TIS) for the proposed Buford Travel Center (Project) in the northeast quadrant of the State Route (SR) 99/Manning Avenue interchange near the City of Fowler. The proposed Project would include: a truck and automobile gas station with a 9,000 square-foot travel center building (Phase 1), a 10,000 square-foot truck repair building (Phase 2), a 4,627 square-foot dine-in restaurant (Phase 3), a 4,378 square-foot restaurant with a drive through (Phase 4), a 3,116 square-foot restaurant with a drive-through (Phase 5), and a 120-room hotel (40,000 square-feet) (Phase 6):

**Comments to the TIS:**

- Based on Table 1-*Existing Trip Generation*, the trip generation rates for the existing 3,500-square-foot travel center building is 42.86 for the A.M. peak hour and 49.14 for the P.M. peak hour (determined using the approximated square-footage of the existing building). The Project trip generation rates for the travel center (based on the referenced Madera Love's TIS) are considerably lower: 31.00 for the A.M. peak hour and 39.00 in the P.M. peak hour. The existing truck percentage is 40 percent; whereas, the estimated truck percentage from the Love's TIS is 30 percent. It appears at this location; the existing trip generation rates are higher than what was presented in the City of Madera Love's Travel Center Project EIR. The existing trip generation rate is approximately 138 percent and 126 percent higher for the A.M. and P.M. peak hours, respectively. This would translate to 386 A.M. peak hour trips and 442 P.M. peak hour trips for the Travel Stop land use. **(FINDING 1)**
- Caltrans considers the 20 percent capture-trip reduction for internal capture greater than what would be expected. The ITE Trip Generation Handbook states: "If an on-site land

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use does not match a land use category in Table 7.1, either (1) collect local data to establish an internal capture rate, according to the procedures described in Section 7.7 of this chapter, or (2) assume no internal capture." The ITE Trip Generation Handbook only provides internal capture rates for office, retail, and residential land uses in Table 7.1. When applied, the reduction is nearly equivalent to the generated trips in the peak hours from the 3,116 square-foot restaurant with a drive through and the 120-room hotel (Land Use Codes 934 and 120). Heavy traffic generating service land uses should not be expected to function similarly to retail land uses. A captured rate of five percent is reasonable and should be applied. **(FINDING 2)**

- Without the Manning Avenue driveway turning movements, the trip distribution is difficult to assess. A trip distribution diagram with all applicable Project traffic in percentages is recommended.
- The existing peak-hour traffic volumes shown in Figure 10 have some volume discrepancies. For example, the P.M. peak volume for eastbound Manning Avenue from Temperance Avenue to the SR 99 southbound ramps decreased by 50 percent (or 202 peak hour trips). Also, some of the volumes along Manning Avenue differ significantly from the *SR 99/Dinuba Avenue Traffic Analysis Feasibility Study* prepared by VRPA Technologies for Fresno Council of Governments and the City of Selma. Justification is needed for the reduced trips. **(FINDING 3)**
- The lane configurations for the SR 99 northbound and southbound off-ramps shown in Figure 3 do not reflect existing conditions. Both ramps are currently single lane with short flared right-turn lanes. This distinction is particularly important when coding the Synchro files. The assignment of independent turn lanes (as shown in the Synchro outputs) does not completely assess queue lengths and subsequent delay. **(FINDING 4)**
- The TIS did not adequately analyze vehicle queues. Vehicles queued in through lanes may impede adjacent turn lanes and exacerbate vehicle queues and delays. In Table 16, for eastbound Manning Avenue at Vineyard Place (during the P.M. peak scenarios), the through lane is predicted to impede the left-turn lane. Also, spillover from turn lanes can block adjacent lanes. The northbound off ramp left-turn queue is predicted to block vehicles attempting to make a right turn, as shown in Table 16. **(FINDING 5)**
- With the heavy volume of traffic on westbound Manning Avenue using the northbound SR 99 on-ramp, lane utilization at the northbound off-ramp intersection (when signalized) and Vineyard Place intersection should expect reduced capacity and additional queueing.
- The proposed existing-plus-project mitigation includes the signalization of Manning Avenue at the northbound SR 99 off-ramp in its current configuration. This improvement would likely require (but is not limited to): turn lanes with adequate length and tapers, standard shoulder widths (4-foot left shoulder and 8-foot right shoulder), and the reconstruction of the intersection grade to satisfy the Caltrans Highway Design Manual 504.3 ("Ramp terminals should connect where the grade of the overcrossing is 4 percent or less to avoid potential overturning of trucks").
- Caltrans recommends roundabouts be analyzed utilizing Sidra Intersection software.
- This TIS recognizes that the Project would have a significant impact to the SR 99/Manning Avenue interchange and that this interchange would need significant improvements with the Project in future conditions. The development itself would impede possible right-of-way acquisition for interchange improvements by utilizing adjacent property.

Caltrans concurs with *Significant Impact Transportation 1* and *Mitigation Measure Transportation 1* as presented on page 23 in that interim improvements will be needed for the

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SR 99 northbound off-ramp/Manning Avenue with the construction of the Project. Any new project that may require employing traffic signals at state highway intersections must consider a roundabout and the supporting design configuration per the Intersection Control Evaluation (ICE) guidelines. ICE establishes a context and performance-based evaluation process to produce engineering recommendations on intersection traffic control strategies and geometric configurations for location specific needs and conditions. The first step of the ICE process will constitute conceptual approval by Caltrans. The Project opening day mitigation at an intersection must be evaluated per the ICE procedure. This policy will affect the engineering process to determine the intersection improvement on SR 99.

Caltrans concurs with *Significant Impact Transportation 2* and *Mitigation Measure Transportation 2* as presented on page 23 to mitigate its share of the year 2040 cumulative significant impacts at the Manning Avenue / SR 99 interchange, the Project shall pay an equitable share in the amount of \$1,402,504.80. If the City of Fowler chooses not to collect mitigation for the State highway system, Caltrans is willing to collect this mitigation for local developments, which impact State facilities. Caltrans has established a Traffic Mitigation Agreement (TMA) for the collection and tracking of these funds. **The TMA needs to be executed prior to issuance of City building permits and payment of the fair share mitigation amount needs to occur prior to occupancy for each phase.**

Based on Findings 1 through 5, the amount of discrepancy in the TIS could change the existing plus project conclusion significantly and possibly change the mitigation measures. This may include but not limited to SR 99/Manning Avenue southbound off-ramp. In addition, the queuing analysis should also include the SR 99/Manning Avenue northbound and southbound off-ramps. **It is recommended that the TIS be revised based on the findings made and resubmitted to Caltrans for review.**

#### **Environmental Comments to the Draft EIR:**

- Chapter 2, page 2-7 the issuance of a Caltrans Encroachment Permit has been misidentified as a “ministerial” approval. The issuance of a Caltrans Encroachment Permit for work on the State right-of-way is a discretionary action. Under state law Caltrans has discretionary approval authority, as provided in Section 670 of the Streets and Highway Code, to approve projects that encroach within the State’s highway right-of-way. This discretionary authority gives Caltrans a “Responsible Agency” status under the California Environmental Quality Act for the part of a project that requires work within the State’s highway right-of-way.
- Chapter 3, page 3-18 identifies the valley elderberry longhorn beetle as a species that has the potential to occur onsite and/or in the vicinity. It is our understanding that the United States Fish and Wildlife Service has determined that the range of this species does not include Fresno County.
- Chapter 6, page 6-4 states that all construction will occur during the day. However, this mitigation measure will need to be determined whether it is feasible for the proposed improvements on the State Highway System.
- Ensure that the Final Environmental Impact Report has an analysis of the potential environmental impacts for the proposed work on the State Highway System. The project location and project study area need to include any required off-site improvements.
- For work that requires an encroachment permit on the State Highway System, additional avoidance and minimization measures may be required.
- Caltrans may require additional studies if we determine that environmental impacts have not been adequately addressed for work occurring on the State Highway System.

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- Once a determination has been made as to which alternative for traffic mitigation on the State Highway System (round-about or traffic signal) environmental impacts that have the potential to occur from traffic mitigation measures should be evaluated before the final environmental document is certified.

If you have any further questions, please contact me at (559) 444-2493.

Sincerely,



DAVID PADILLA  
Associate Transportation Planner  
Division of Transportation Planning

c: Michael Navarro, Chief, Planning North Branch, Caltrans  
Shane Gunn, Chief, Environmental Analysis, Caltrans  
State Clearinghouse, Office of Planning and Research