## DEPARTMENT OF TRANSPORTATION DISTRICT 6 OFFICE 1352 WEST OLIVE AVENUE

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February 14, 2020

06-TUL-216-13.07 FOCUSED DEIR & TIS INDUSTRIAL-RETAIL COMPLEX CONCORD CENTER (3) WOODLAKE, CA SCH # 2019090505

## SENT VIA EMAIL

Mr. Jason Waters Community Services Director City of Woodlake 350 N. Valencia Boulevard; Suite 2 Woodlake, CA 93286

Governor's Office of Planning & Research

FEB 14 2020

## STATE CLEARINGHOUSE

Dear Mr. Waters:

Thank you for the opportunity to review the Focused Draft Environmental Impact Report (EIR) and associated Traffic Impact Study (TIS) for the Concord Center Industrial Project.

- The Project proposes various industrial uses allowed by the zone district, including cannabis cultivation, manufacturing, and distribution which is allowed with a Conditional Use Permit.
- A Tentative Parcel Map will be processed to divide the approximately 17.8-acre site into 13 lots, ranging in size from 42,000 square feet (sf) to 62,000 sf each. Each lot will be developed with a building ranging in size from 10,000 sf to 22,000 sf, for a potential total of 210,000 sf of building floor space.
- The project site is located at the southeast corner of State Route (SR) 216 (Avenue 344/Naranjo Blvd.) and Road 204 (Blair Road). Access to the site is provided from SR 216 (Avenue 344/Naranjo Blvd.) and Road 204 (Blair Road) via a shared driveway and access road to each building lot.
- Site improvements and building construction will occur in one phase, anticipated to be completed within 2 years.
- The EIR indicated that the Project at full build-out will employ up to 30 full time staff and will operate from 8am to 5pm, up to seven days per week.
- According to the Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition, 210,000 square feet of general light industrial space is estimated to generate 1,467 daily vehicle trips with 179 trips during the PM peak hour.



Making Conservation a California Way of Life The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. 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.

Caltrans provides the *following comments* consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

- 1. Please verify the location description (section 2.3) in the EIR on page 2-1.
- 2. As noted, access to the site will be via a new driveway and access road connected to Road 204/Blair Road. Based on the aerial mapping, this connection appears to be situated approximately 200 feet south of the SR 216/Road 204 intersection. However, this dimension is not shown on the site plan. Please provide this dimension on the site plan for Caltrans review.
- 3. Caltrans review of the Traffic Impact Study (Appendix C) found the Project trip generation (Table 1) to be satisfactory. Caltrans comments made during the TIS scope review, requested clarification on the proposed trip distribution, specifically the 40% directional split in the south. The TIS explains that the City anticipates a significant amount of Project traffic will travel along SR 65 between Woodlake and other towns such as Exeter, Lindsey, Porterville and Tulare. Caltrans acknowledges this explanation.
- 4. Caltrans also requested clarification regarding vehicle usage, specifically the largest vehicle anticipated to access the Project site, and whether Blair Road is designed to accommodate that design vehicle. Please provide clarification on the vehicle type and provide turning templates of the largest vehicle design at the SR 216/ Blair Road intersection to verify this intersection is adequate to accommodate turning movements of the design vehicle.
- 5. Pages 3-18 and 3-19 of the EIR indicate that the TIS analysis determined in the opening year (2021) with the addition of project traffic, the intersection of SR 216 (Naranjo Boulevard) and Road 204 is anticipated to operate below an acceptable level of service.
- 6. The TIS analysis concluded that the Projects impact to this intersection will be reduced to a less than significant impact with the implementation of Mitigation Measure TRA-1:

## Mitigation Measure TRA-1:

The Project shall be responsible for paying its fair share cost percentages and/or constructing improvements as detailed in Table 3.11, subject to reimbursement for the costs that are in excess of the Project's equitable responsibility as determined by the City of Woodlake. This shall be itemized and enforced through conditions of approval or a development agreement, at the discretion of the City of Woodlake.

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- 7. Table 3.11 on page 3-19 of the EIR indicates that the <u>Projects Pro-Rata Fair Share</u> <u>Percentage</u> towards future intersection improvements <u>is 31.49%</u>.
- 8. As noted, the TIS analysis indicated that the Concord Center Industrial Project will cause an impact at the intersection of SR 216 and Road 204 during the evening peak hour period in the opening year (year 2021). Specifically, the failure is on the northbound movement. With the addition of the Project, the northbound queue length and delay on Road 204 (Blair Road) will increase significantly.
- 9. The TIS analysis recommends converting the existing two-way stop control intersection on Road 204 (Blair Road) to a signalization intersection. Signalization of the intersection was selected as the intersection control improvement in the TIS analysis as mitigation for the Project related traffic impacts.
- 10. However, Caltrans will require the developer to conduct an <u>Intersection Control</u> <u>Evaluation (ICE)</u> to determine which type of intersection control solution is warranted at this intersection.
- 11. Any new project that may require employing full control at state highway intersections (i.e. to control all approaching traffic via use of signal, stop or yield control) must consider all three intersection control strategies (stop, roundabout and signal) and the supporting design configurations 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 Traffic Operations Office. The project opening day mitigation at an intersection must be evaluated per the ICE procedure. This new policy will affect the engineering process to determine the intersection improvement on State Route (SR) 216. The ICE requirements can be found on the Caltrans website: <a href="http://www.dot.ca.gov/hg/traffops/liaisons/ice.html">http://www.dot.ca.gov/hg/traffops/liaisons/ice.html</a>.
- 12. As a point of information, the City and the developer should be aware that Caltrans anticipates that a <u>Roundabout</u> would potentially be the type of intersection control improvement at the intersection of SR 216 and Road 204(Blair Road).
- 13. According to the Caltrans Transportation Concept Report (TCR), this segment of SR 216 in the vicinity of the proposed project is currently a 2-lane conventional highway and ultimately planned to be a 4-lane facility within a total of 84 feet of right-of-way (42 feet from the centerline). Caltrans existing ROW map shows this segment with a ROW total, varying from 50 feet to 73 feet with **25 feet** on the south side of the centerline along the Project's northern boundary with SR 216.
- 14. Caltrans recommends that an irrevocable offer of dedication (IOD) to Caltrans for **17 feet** of ROW is needed to accommodate the ultimate configuration of SR 216.
  - Dedications need to be shown on a revised site plan and forwarded for our review. A summary of the requirements for right-of-way dedications can be provided.

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- 15. The below cross section design for SR 216 (comment #15), based on the above 84foot right-of-way width for a 4-lane highway, was discussed and agreed to by Caltrans and the City of Woodlake for the Green Bean, Uncle Green and other developments located along the southside of SR 216.
- 16. The following cross section is valid and recommended for the current Project. The <u>opening day</u> curb line will be approximately 27 feet from the SR 216 centerline which will allow for a travel lane, bike lane and shoulder. The above ROW dedication will also preserve right-of-way for a 3-lane cross section in the future consisting of one (1) 12-foot wide lane in each direction with a 14-foot wide two-way left turn (TWLT) lane (7 feet on both side centerline) and a shoulder. Caltrans determined that a TWLT lane would allow safer access and turning movements for properties developed along SR 216. This transition from a 2-lane to a 3-lane highway would take place west of the Green Bean Project site (west of Acacia Street) as the City's downtown area merges with the envisioned "industrial park" area west of downtown. Restriping SR 216 to the two-way left turn lane in the future may require Caltrans to eliminate and prohibit on-street parking.
- 17. Caltrans requires a minimum 6-foot sidewalk (10-foot preferred), measured from the back of the curb along SR 216.
- 18. Caltrans recommends placement of the back of the sidewalk at the ultimate right of way line.
- 19. The sidewalk and any landscaping shall be maintained per a "Caltrans District 6" approved maintenance agreement.
- 20. The SR 216 cross sections and the site plan should show dimensions measured from the existing SR 216 centerline.
- 21. Opening day improvements constructed along SR 216 for the Project may reduce the right-of-way needed for the IOD.
- 22. Dust control measures shall be implemented on the site in a manner to prevent dust from entering the State right-of-way.
- 23. No water from the proposed project shall flow into the State right-of-way without approval from the District Hydraulic Engineer.
- 24. The Caltrans Permit Department and the Environmental Planning Branch will review and approve the activity and work in the State right-of-way before an encroachment permit is issued.
- 25. The CEQA (California Environmental Quality Act) document prepared and submitted to the State Clearing House for the Project will <u>need to include</u> <u>analysis</u> of the frontage improvements (new ROW, curb-gutter-sidewalk)

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along SR 216 <u>for environmental clearance</u> (using the assigned SCH #) required during the Caltrans encroachment permit process.

26. An encroachment permit must be obtained for all proposed activities for placement of encroachments within, under or over the State highway rights-of-way. Activity and work planned in the State right-of-way shall be performed to State standards and specifications, at no cost to the State. Engineering plans, calculations, specifications, and reports (documents) shall be stamped and signed by a licensed Engineer or Architect. Engineering documents for encroachment permit activity and work in the State right-of-way may be submitted using English Units. The Permit Department and the Environmental Planning Branch will review and approve the activity and work in the State right-of-way before an encroachment permit is issued. The Streets and Highways Code Section 670 provides Caltrans discretionary approval authority for projects that encroach on the State Highway System. Encroachment permits will be issued in accordance with Streets and Highway Codes, Section 671.5, "Time Limitations." Encroachment permits do not run with the land. A change of ownership requires a new permit application. Only the legal property owner or his/her authorized agent can pursue obtaining an encroachment permit. Please call the Caltrans Encroachment Permit Office - District 6: 1352 W. Olive, Fresno, CA 93778, at (559) 488-4058. Please review the permit application checklist at:

https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?frmid=TR0402&distpath=MA OTO&brapath=PERM

- 27. Upon project approval by the local public agency and prior to an encroachment permit application submittal, the project proponent is required to schedule a "Pre-Submittal" meeting with District 6 Encroachment Permit Office. Please contact District 6 Encroachment Permit Office at (559) 488-4058 to schedule this meeting. Please contact District 6 Encroachment Permit Office at (559) 488-4058 to schedule this meeting. Please review the permit application checklist at: <a href="https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?frmid=TR0402&distpath=MA\_OTO&brapath=PERM">https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?frmid=TR0402&distpath=MA\_OTO&brapath=PERM.</a>
- 28. Page 3-2 of the EIR states 'There are <u>no</u> established pedestrian or bicycle paths in the City". As a point of information, the map on page 90 of the 2010 Tulare County Regional Bicycle Transportation Plan (<u>http://www.tularecog.org/wp-content/uploads/2015/07/2010-Tulare-County-Regional-Bicycle-Transportation-Plan.pdf</u>) indicates an existing bike path around the northern portion of Bravo Lake. The 2010 Bike Plan also indicates that the City of Woodlake will be extending the bike path around Lake Bravo and will establish other bike lanes/paths within the City. Please verify.
- 29. The TIS completed an evaluation of the average vehicle miles traveled (VMT) for the Project's traffic. VMT data was obtained from the Tulare County Association of Governments (TCAG). Based on household and employment populations in the Woodlake area, as well as travel patterns throughout the region, TCAG data has established the regional average VMT per inbound and outbound trip to be 15.21 miles and 15.31 miles, respectively.

In order to establish the anticipated VMT profile for the proposed light industrial project, an investigation into the employee trips was conducted. The primary factor involved in this evaluation is the location of the project site in relation to the surrounding population centers. The City anticipates a significant amount of traffic will travel between Woodlake and surrounding cities.

Based on the information gathered and the project traffic distribution, 39% of the employees will be traveling from within Woodlake city limits while 43% of employees are anticipated to be traveling from Visalia, Tulare and Hanford and 17% of the employees are anticipated to be traveling from Exeter, Lindsay, and Porterville.

The average trip length for employees traveling from surrounding cities was determined to be approximately 20.77 miles. The average trip length for employees traveling from Woodlake was determined to be approximately 1.50 miles. The combined average trip length for all employees resulted in an average trip length of 13.19 miles.

As previously mentioned, the regional average VMT for inbound and outbound trips as established by TCAG is 15.21 miles and 15.31 miles, respectively. The project's average VMT is anticipated to bring down the regional average, and therefore will not cause a transportation impact.

- 30. Alternative transportation policies should be applied to the development. An assessment of multi-modal facilities should be conducted to develop an integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the City. The assessment should include the following:
  - a. Pedestrian walkways should link this proposal to an internal project area walkway, transit facilities, as well as other walkways in the surrounding area.
  - b. The project should consider bicycles as an alternative mode of transportation and offer internal amenities to encourage bicycle use which should include parking, security, lockers and showers.
  - c. If transit is not available within <sup>1</sup>/<sub>4</sub>-mile of the site, transit should be extended to provide services to what will be a high activity center.

If you have any other questions, please call me at (559) 488-7396.

Sincerely,

DAVID DEEL Associate Transportation Planner Transportation Planning – North