



## PLANNING DEPARTMENT

Gary Conte, AICP, Planning Manager

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TO: City of Madera Planning Commission  
FROM: Gary Conte, AICP, Planning Manager  
RE: Response to Comments from Caltrans on the Initial Study/Mitigated Negative Declaration (IS/MND) for Site Plan Review (SPR) 2021-24  
DATE: August 6, 2021

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The following memo is a response to the comment letter dated August 5, 2021 received from Caltrans on the above noted document.

The Notice of Intent was published on July 17th, 2021 and this IS/MND was routed to responsible and trustee agencies for comment. The comment period will end on August 10, 2021 and thus far, one comment letter has been received and has been attached to this memo for reference. This comment letter, submitted by Caltrans and dated August 5, 2021, is addressed below. These responses are clarifications to the record and are not “substantial revisions” as outlined in Section 15073.5 and thus do not require recirculation. Specifically, section 15073.5(c) of the CEQA Guidelines state the following:

*Recirculation is not required under the following circumstances: ...*

- 4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

Most of items listed in the document are informational and not directly related to the analysis and findings contained in the IS/MND. Item number 2 in the letter is the only item related to the CEQA analysis and states the following:

**Comment:** *A Vehicle Miles Traveled (VMT) analysis was conducted but trips associated with large trucks were excluded from the VMT analysis and only employee and customer trips were considered. As a result, it is recommended the VMT analysis be revised to include large truck trips for the parcels. It is also recommended that improvements for existing and future bike/pedestrian facilities on roads within the boundaries of the specific plan and connectivity between home to work/home to shops be considered in the VMT analysis.*

**Response:** The VMT analysis/screening was conducted in compliance with the Office of Planning and Research (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA and CEQA Guidelines. Specifically, CEQA Guidelines Section 15064.3 state that, “vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” Page 4 of the above-mentioned technical advisory, under “Recommendations Regarding Methodology” states the following:

***“Vehicle Types. Proposed Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” Here, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks.”***

As discussed in the IS/MND, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. Thus, per state guidance and regulations, heavy-duty truck VMT need not be included in the VMT analysis. Based on the analysis contained in the IS/MND, the project screens out of a formal VMT analysis. Thus, no changes are needed and no changes have been made to the IS/MND.

## California Department of Transportation

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August 5, 2021

MAD-99/145-10.85  
Industrial Warehouse Project  
SPR 2021-24, Preliminary Review

<https://ld-igr-gts.dot.ca.gov/district/6/report/23690#32919>

### **SENT VIA EMAIL**

Derek Sylvester, Associate Planner  
City of Madera, Planning Department  
205 West 4th Street, Madera, CA 93637  
p. (559) 661.5436

Dear Mx. Sylvester,

Thank you for the opportunity to review SPR 2021-24 and Initial Study/Negative Declaration (IS/ND) for the proposed South Schnoor Avenue Industrial project. The project proposes the development of four (4) single-story, pre-engineered metal buildings (PEMB) for flex/warehouse spaces to occupy approximately 9.0 acres of a 16.57-acre parcel. The four (4) buildings will range in size from 35,100 square feet (Buildings C and D) to 37,050 square feet (Buildings A and B) for a total of 74 leasable units at 1,950 square feet, totaling a gross building area of 144,300 square feet. The project is located in southwest area of the City of Madera, approximately 1.5 miles southwest of State Route 99 (SR 99) and 1.4 miles west of SR 145.

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

1. As a point of information, according to the operational statement and trip generation analysis, the proposed facility will generate approximately 1,000 daily trips. However, Project related traffic and operational maintenance would be temporary, and therefore, would not result in any long-term degradation in operating conditions on local roadways used for the project. Based on the description provided and Initial Study, the project is expected to have minimal impacts on the State facilities. However, if there any deviations from what is being proposed, then Caltrans would like to have a chance to review again.

2. A Vehicle Miles Traveled (VMT) analysis was conducted but trips associated with large trucks were excluded from the VMT analysis and only employee and customer trips were considered. **As a result, it is recommended the VMT analysis be revised to include large truck trips for the parcels. It is also recommended that improvements for existing and future bike/pedestrian facilities on roads within the boundaries of the specific plan and connectivity between home to work/home to shops be considered in the VMT analysis.**
3. Caltrans recommends the project implement multimodal strategies, such as those that originate from Transit-oriented development (TOD), in an effort to further reduce VMT.
4. Active Transportation Plans and Smart Growth efforts support the state's 2050 Climate goals. Caltrans supports reducing VMT and GHG emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.
5. Caltrans recommends, if not done so already, the City/County of Madera develop a Development Impact Fee Program to fund future major transportation projects in the area so that projects, such as this one, can pay into to mitigate their fair share.

If you have any other questions, please call or email Edgar Hernandez at (559) 981-7436 or [edgar.hernandez@dot.ca.gov](mailto:edgar.hernandez@dot.ca.gov).

Sincerely,



David Padilla, Branch Chief  
Transportation Planning – North