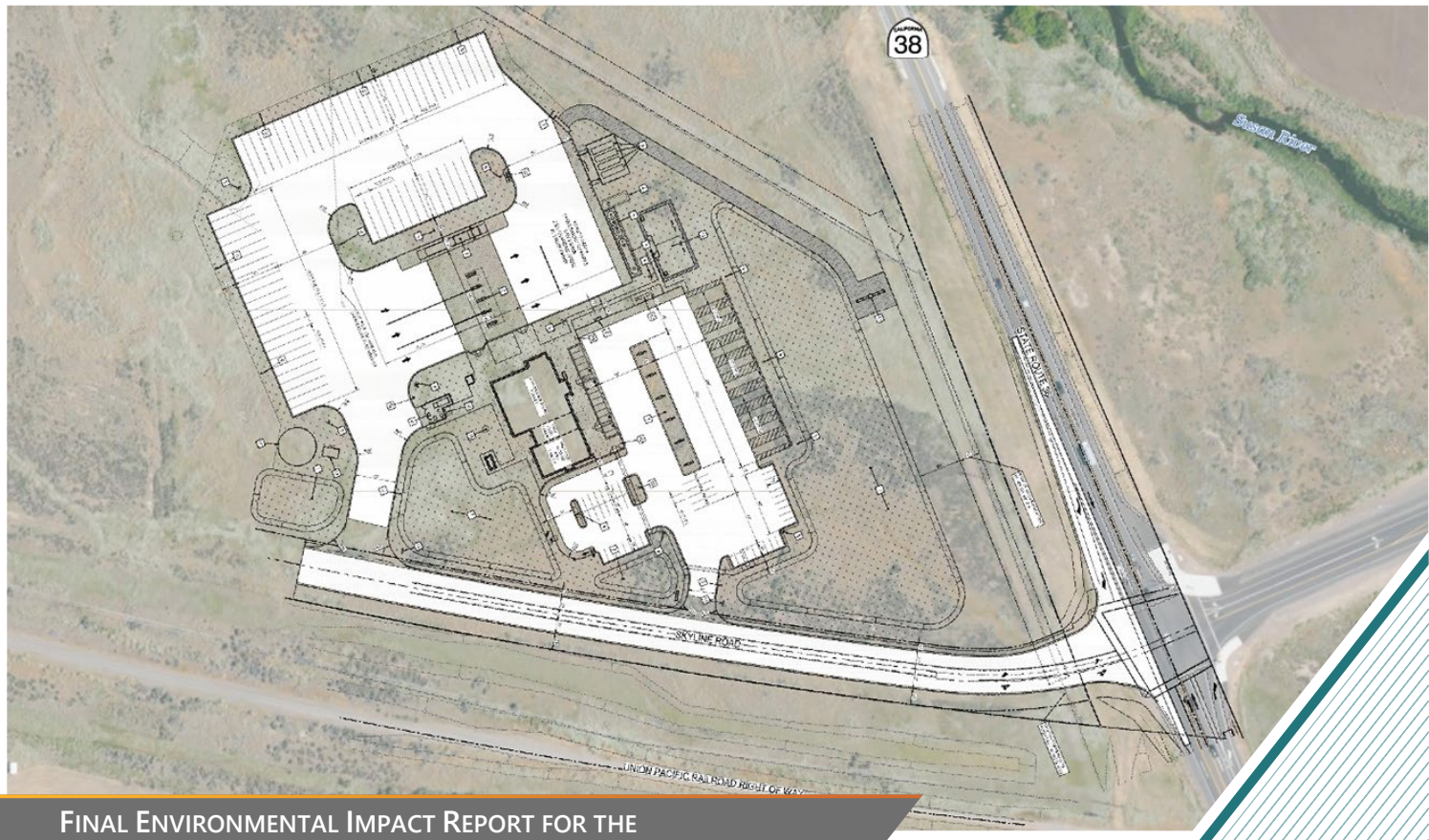


FINAL ENVIRONMENTAL IMPACT REPORT FOR THE

Susanville Travel Stop Project

Prepared for:

City of Susanville

March 2026

FINAL ENVIRONMENTAL IMPACT REPORT FOR THE

Susanville Travel Stop Project

Prepared for:

City of Susanville
66 N. Lassen Street
Susanville, CA 96130

Contact:

Mr. Dan Newton
City Manager
66 North Lassen Street
Susanville, CA 96130
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Fax: (530) 252-5109

Prepared by:

Ascent
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Contact:

Eric Ruby
Project Director
619.489.5676

March 2026

20240127.03

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LIST OF ABBREVIATIONS

APN	Assessor's Parcel Number
BMPs	Best Management Practices
BUG	Backlight-Uplight-Glare (BUG) standards
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Susanville
CO	carbon monoxide
CUPA	Certified Unified Program Agency
Draft EIR	Draft Environmental Impact Report
EMFAC	Emissions Factor Model
Final EIR	Final Environmental Impact Report
IES	Illuminating Engineering Society
LAFCO	Lassen County Local Agency Formation Commission
Msl	mean sea level
NOA	Notice of Availability
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
project	Susanville Travel Stop Project
RMP	Risk Management Plan
ROW	right-of-way
RV	recreational vehicle
SR	State Route
STAA	Surface Transportation Assistance Act
SWPPP	Stormwater pollution Prevention Plan
TAC	Toxic Air Contaminants
USEPA	US Environmental Protection Agency
VMT	Vehicle Miles Traveled

1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by the City of Susanville (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR, Title 14, Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) for the Susanville Travel Stop Project (project). The Final EIR consists of the Draft EIR, all attachments and references therein, and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible agencies;[1] trustee agencies;[2] and any other state, federal, and local agencies that have jurisdiction by law with respect to the project, or that exercise authority over resources that may be affected by the project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR made in response to these comments and as a result of the applicant's ongoing planning and design efforts. The Final EIR will be used to support the City's decision regarding whether to approve the project.

This Final EIR will also be considered by CEQA responsible agencies when complying with CEQA before deciding whether and how to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over portions of the project.

Responsible, trustee, and interested agencies may include:

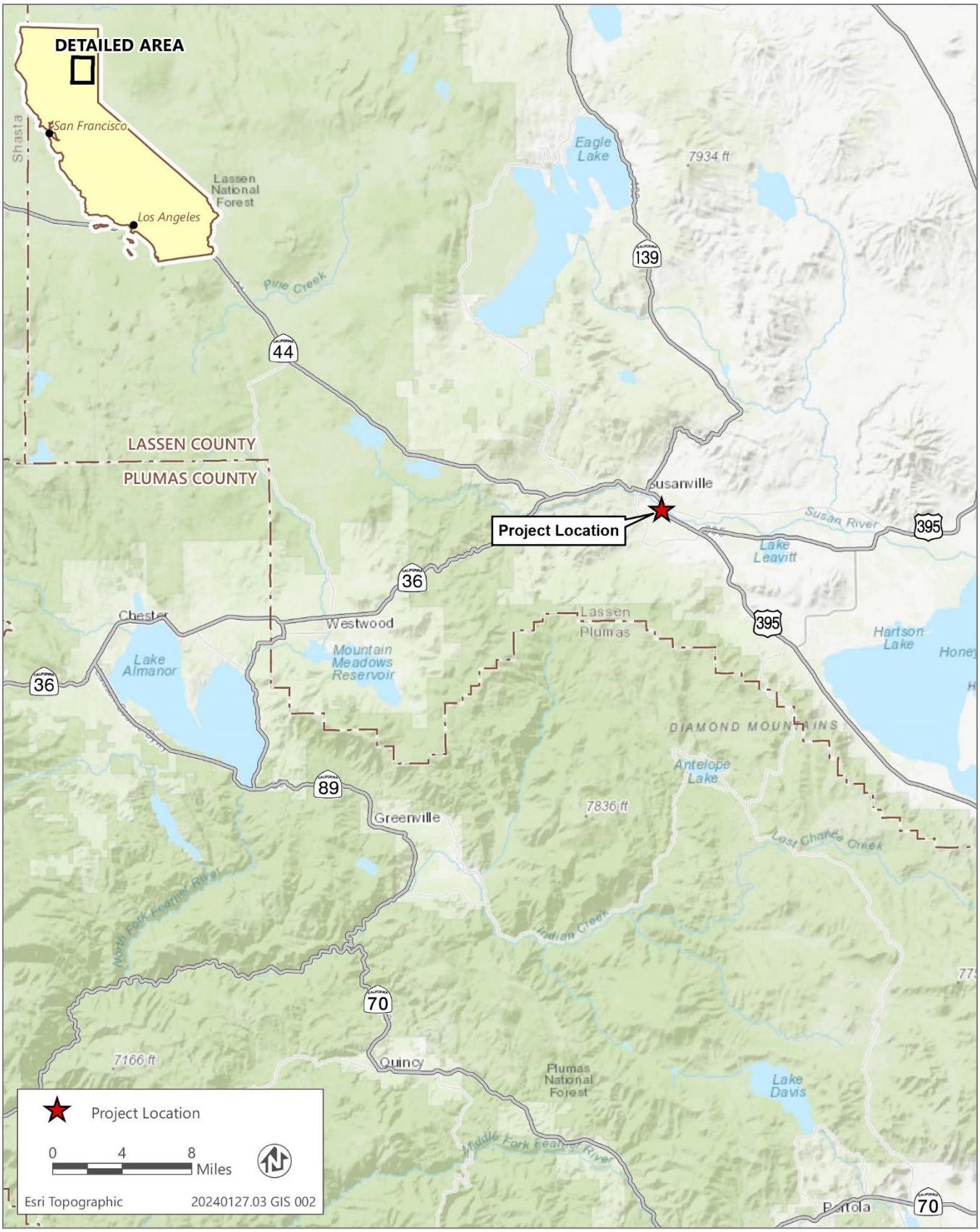
- California Department of Fish and Wildlife
- California Department of Housing and Community Development
- California Department of Transportation (Caltrans)
- Lassen County
- Lassen County Local Agency Formation Commission (LAFCO)
- Lahontan Regional Water Quality Control Board
- Susanville Sanitary District

1.2 PROJECT LOCATION

The project applicant is proposing to construct and operate a full-service travel stop on approximately 14.15 acres of vacant land to the southeast of the City of Susanville (project site) (Figure 1-1). The project site is part of a larger 79.6-acre parcel (Assessor's Parcel Number [APN] 107-280-017), located in unincorporated Lassen County that is proposed for annexation into the City of Susanville. The project site (14.15 acres) is located immediately south of Susanville city limits and west of State Route (SR) 36 (Figure 1-2). The remainder of the 79.6-acre parcel (e.g. 65.55 acres) would remain undeveloped.

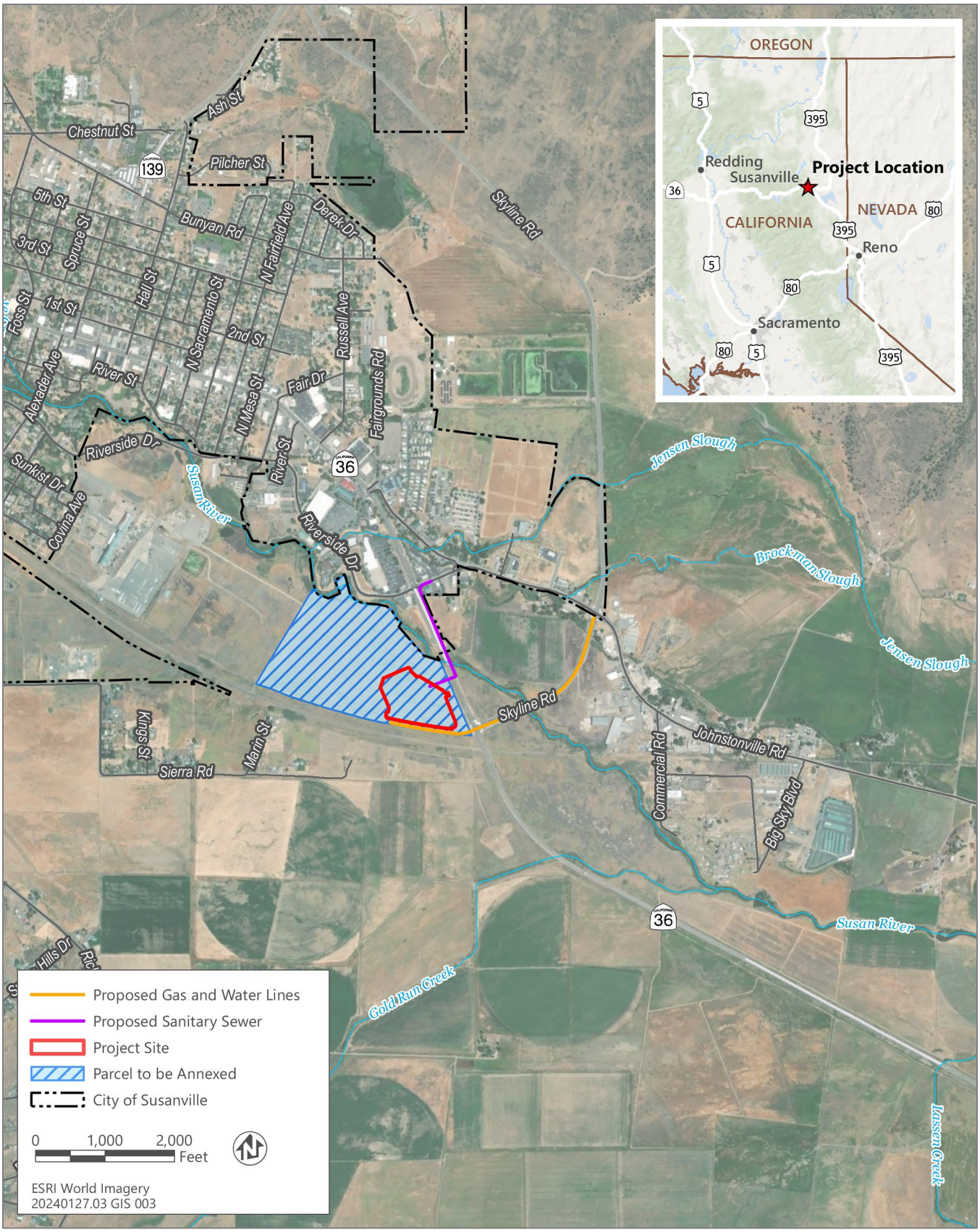
[1] "Responsible agencies" include "all public agencies other than the lead agency [here, the City of Susanville] which have discretionary approval power over the project." (Cal. Code Regs., tit. 14, div. 6, ch. 3 ("CEQA Guidelines") § 15381.)

[2] "Trustee agencies" include any "state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." (CEQA Guidelines, § 15386.)



Source: Adapted by Ascent in 2024.

Figure 1-1 Regional Location



Source: Adapted by Ascent in 2025.

Figure 1-2 Project Vicinity

Existing and future truck and vehicular traffic is anticipated to generate substantial demand for the proposed travel stop facilities and services as the city lies at the junction of SR 36 and SR 139. SR 36 is an east-west highway that extends from just west of Susanville to US 101 near the California Coast. Near Susanville, the roadway serves as an important link between Redding and Red Bluff (via SR 36 and SR 44) to the west and Reno/North Lake Tahoe (via US 395) to the east. SR 139 heads north to the Oregon border as a direct route to Klamath Falls.

The City of Susanville is located on the Susan River in the southern part of Lassen County, California at the head of Honey Lake Valley. The city is located approximately 4.5 miles northwest of the unincorporated community of Johnstonville and 82 miles northwest of Reno. To the north, the project site is located proximate to the Susan River with Riverside Drive, commercial businesses and the Lassen County Government center beyond. To the east, the project site is bounded by SR 36 with primarily vacant land beyond. To the south, the former Southern Pacific Railroad right-of-way (ROW) is immediately adjacent to the project site, although the tracks were removed in approximately 2006 and the ROW is now an unpaved portion of Skyline Road, with several residential properties off Sierra Road present further south. Beyond Sierra Road lies agricultural land. To the west, the remainder of the project site parcel is present with vacant land adjacent, and a lumber yard associated with a prefabricated construction company beyond. Susanville Municipal Airport is located approximately 3 miles southeast of the project site.

The project site is included within Assessor's Parcel Map Book 107-28, and no street address is currently assigned to the property. The project site consists of relatively disturbed, generally flat land with riverine and wetland habitat to the north associated with the Susan River. The project site is disturbed and heavily populated with invasive plant species such as perennial pepperweed (*Lepidium latifolium*) and cheatgrass (*Bromus tectorum*) as well as Medusa head (*Elymus caput-medusae*) to a lesser extent. Several barbed wire fence lines are present on the property, indicating the site was likely previously used as pastureland. Additionally, a former barn with associated outbuildings and a retention pond was present immediately west of the site, although this had been demolished by August 2019.

The project site area is generally flat at elevation 4,151 to 4,153 feet above mean sea level (msl). The SR 36 highway embankment and future road grade is at 4,154 ft at the intersection with Skyline Road, and the former railroad embankment is at 4,159 ft. The SR 36 embankment cuts off natural flow along the plain and water must divert northward to the Susan River channel.

The proposed project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronics, snacks, travel items, and food from two fast-food restaurants, one with a drive-thru. A dog park, recreational vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas and landscaping/lighting are also proposed, along with a 10-space overnight RV park. Project visitors/customers would include "over-the-road" trucks (i.e., professional long-haul drivers who are on the road for consecutive days or weeks at a time), traveling motorists, and local residents. Primary access to the project site would be provided from SR 36 via an existing signalized intersection at SR 36 and Skyline Road improved with a new dedicated exit lane southbound and a new northbound dedicated turn lane onto Skyline Road. Ingress/egress would be provided via two entry/exit points off Skyline Road, the first for RVs and automobiles and the second for trucks.

The proposed project would install storm drains and proposed project grading would also implement stormwater control/drainage and water quality features to prevent drainage and water quality impacts, which would include bioretention ponds and standard best management practices (BMPs). Additionally, a variety of offsite improvements, including highway and street improvements and transitions, drainage facility connections, utility connections (water, gas and sewer), and landscaping are proposed as provided in detail in the Draft EIR.

1.3 PROJECT OBJECTIVES

Consistent with CEQA Guidelines Section 15124(b), a clear statement of the objectives and underlying purpose of the project shall be disclosed in the Draft EIR. The underlying purpose of the project is to develop a regional travel stop and related commercial land uses on Regional Commercial (C-R)-designated land within unincorporated Lassen County on land that will be annexed into the City of Susanville via an annexation application processed by the Lassen County Local Agency Formation Commission (LAFCO). This underlying purpose, in turn, gives rise to the following project objectives:

- Create a high-quality travel stop commercial development along SR 36, a designated Surface Transportation Assistance Act (STAA) route.[3]
- Develop a property of sufficient size to create a regional travel stop that would accommodate a truck and auto fuel dispensing area, convenience store, two fast-food restaurants, dog park, truck parking and overnight RV parking.
- Construct a travel stop facility near a major highway to minimize truck and automobile movements, Vehicle Miles Traveled (VMT), and associated air pollutant and greenhouse gas emissions and traffic noise on local streets.
- Assist the City of Susanville with meeting its economic development goals, as set forth in its General Plan.
- Maximize tax revenue to the City of Susanville.
- Provide employment opportunities for residents of the City of Susanville and surrounding areas.
- Construct a facility that can be served by municipal water and sewer to support planned operations.
- Include signage visible to oncoming truck and automobile drivers along State Route 36 and Skyline Road at sufficient distances to allow the drivers to safely make their way to points of access to the project site.
- Provide a travel stop facility of sufficient size to capture overflow overnight truck parking.

1.4 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified potentially significant effects associated with biological resources, cultural resources, geology and soils, and tribal cultural resources. However, all of the potentially significant impacts from the project can be reduced to a less-than-significant level through mitigation.

1.5 CEQA PUBLIC REVIEW PROCESS

On December 17, 2025, the City released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (https://www.cityofsusanville.gov/326/Susanville-Travel-Stop-Draft-EIR) and its facebook.com page (https://www.facebook.com/cityofsusanville/posts/notice-of-availability-for-a-draft-environmental-impact-report-for-the-susanvill/1302880775212767); and was made available for review at the following location:

- City of Susanville, City Hall, 66 N Lassen Street, Susanville, CA 96130

A notice of availability of the Draft EIR was published in the Intermountain newspaper on December 17 and 24, 2025 and distributed by the City via email to the Lassen County LAFCO, Lassen County, and those commenters/interested parties who commented on the Notice of Preparation (NOP).

As a result of these notification efforts, written comments were received from three agencies (California Geologic Energy Management Division, California Department of Fish and Wildlife, and California Department of Transportation) and 19 individuals on the content of the Draft EIR. Chapter 3, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (CEQA Guidelines Section 15088.5).

[3] STAA routes are those that trucks that are longer than 'CA legal' are allowed to travel on.

1.6 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

- **Chapter 1, "Introduction,"** describes the purpose of the Final EIR, summarizes the project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of the Final EIR.
- **Chapter 2, "Responses to Comments,"** contains a list of all parties who submitted comments on the Draft EIR during the public review period, copies of the comment letters received, and responses to the comments.
- **Chapter 3, "Revisions to the Draft EIR,"** presents revisions to the Draft EIR made to correct errors that were identified by agencies subsequent to the release of the Draft EIR. No other revisions to the Draft EIR were necessary in response to public comments.
- **Chapter 4, "References,"** identifies the documents used as sources for the analysis.
- **Chapter 5, "List of Preparers,"** identifies the lead agency contacts as well as the preparers of this Final EIR.

2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on January 31, 2026. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

A total of three letters containing comments on the Draft EIR were received from public agencies. Nineteen comments were received from members of the public. Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. The comment letters are presented in the order in which they were received.

Table 2-1 List of Commenters

Letter No.	Commenting Agency	Date
A1	California Geologic Energy Management Division (CalGEM)	01.06.2026
A2	California Department of Fish and Wildlife (CDFW)	01.26.2026
A3	California Department of Transportation (Caltrans)	01.28.2026
Letter No.	**Commenting Individual**	**Date**
I1	Elizabeth Norton	01.20.2026
I2	Lorene Guffey	01.27.2026
I3	Shaun Heard	01.28.2026
I4	Julie McKee	01.28.2026
I5	Barney McKee	01.28.2026
I6	Jeff Hemphill	01.28.2026
I7	Janet Corey	01.28.2026
I8	Jennifer Hill	01.28.2026
I9	Cheyenne Powers	01.29.2026
I10	Claudia Dunlavy	01.30.2026
I11	Krishan Kumar	01.30.2026
I12	Ramesh Turen	01.30.2026
I13	Ramesh Turen 2	01.30.2026
I14	Martin Balding	01.30.2026
I15	Cindy Becker	01.31.2026
I16	Amy Holmen	01.31.2026
I17	Steve Hawks	01.31.2026
I18	Unnamed Individual - becka2b@aol.com	01.31.2026
I19	Mary Manning	01.31.2026

2.2 COMMENTS AND RESPONSES

Written comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the responses. Where a comment letter contains multiple comments, each individual comment is indicated by a line bracket and an identifying number in the margin of the comment letter corresponding to the response.

Docusign Envelope ID: 0A7F22AA-E7DD-4BFC-BE15-C44CED630E17

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director
715 P Street, MS 1803
Sacramento, C
T: (916) 4

Letter A1

January 6, 2026

VIA EMAIL

City of Susanville
Dan Newton
dnewton@cityofsusanville.gov
City Hall, 66 N Lassen Street, Susanville, CA 96130

Assessor Parcel Number(s):107-280-017
Property Owner(s): *N/A*
Project Location Address: *Skyline Rd & SR-36*

PROJECT TITLE: *Susanville Travel Stop*

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated *12/16/2025*. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

A1-1

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as

A1-2

State of California Natural Resources Agency | Department of Conservation
Northern District
Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673
Sacramento Office and Mail: 715 P Street, MS 1804, Sacramento, CA 95814 | T: (916) 322-1110 | F: (916) 445-3319
Ventura Office: 1000 S. Hill Road, Suite 116, Ventura, CA 93003 | T: (805) 937-7246 | F: (805) 654-4765
Ventura Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455
conservation.ca.gov

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1/8/2026

asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through **CalGEM's Well Finder database mentioned above**. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

A1-2 (cont)

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain

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1/8/2026

all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the **'Plugging and Abandonment' section of the following link:** https://www.conservation.ca.gov/calgem/for_operators.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer: A1-2 (cont)

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at *916-322-1110* or via email at **CalGemNorthern@conservation.ca.gov** A1-3

Docusign Envelope ID: 0A7F22AA-E7DD-4BFC-BE15-C44CED630E17

1/8/2026

Sincerely,

May Soe

A1-3 (cont)

May Soe
Supervising Oil & Gas Engineer – Northern District – Sacramento

Enclosure

Letter A1 California Geologic Energy Management Division

May Soe, Supervising Oil & Gas Engineer – Northern District – Sacramento
January 6, 2026

A1-1 This comment introduces the California Geologic Energy Management Division (CalGEM) as the agency responsible when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. CalGEM also provides an enclosure with the reported wells in the project area, indicating that there are no wells in the project area.

As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, and identifies that there are no wells in the project area, no further response is required.

A1-2 This comment provides information on regulatory guidance, recommendations related to well abandonment and identifies responsibilities in the event of re-abandonment.

As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A1-3 This comment provides contact information for CalGEM. The City acknowledges the contact information for CalGEM for future reference during the environmental review process.

As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Direct

Letter A2

January 26, 2026

Dan Newton
City Manager
City of Susanville
66 N Lassen Street
dnewton@cityofsusanville.gov

SUBJECT: Review of Susanville Travel Stop, Lassen County, State Clearing House Number 2025011078

Dear Dan Newton:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR), dated December 2025, for the above-referenced project (Project) posted for public review on December 16, 2025. CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines[1].

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its Trustee Agency capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. A2-1

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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state listed rare plants pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code § 1900 et seq.), authorization as provided by the applicable Fish and Game Code may be required.

Project Description:
The City of Susanville (Lead Agency) is proposing to construct and operate a full-service travel stop on approximately 14.15 acres of vacant land to the southeast of the City of Susanville. The Project includes a 24-hour travel stop, a dog park, Recreational Vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas, landscaping/lighting, and 10-space overnight RV park.

Biological Setting:
The Project area is located on a 79.6-acre parcel situated to the southeast of the City of Susanville. The area of disturbance will primarily be limited to 14.15-acres along the southeastern boundary and existing roadways. The MND describes the Project area to be dominated by annual grassland, devoid of any trees, with some sagebrush, wetlands and riparian habitat along the northeastern boundary. The Susan River flows along the northern parcel boundary of the Project area.

A2-1 (cont)

The Susan River's riverine, riparian, and wetland habitats are home to an abundant amount of species including, but not limited to, Lahontan Lake tui chub (*Siphateles bicolor pectinifer*, Species of Special Concern [SSC]), Lahontan mountain sucker (*Catostomus Lahontan*, SSC), greater sandhill crane (*Antigone canadensis tabida*, CESA Threatened), Swainson's Hawk (*Buteo swainsoni*, CESA Threatened), Tricolored blackbird (*Agelaius tricolor,* CESA Threatened), bank swallow (*Riparia riparia*, CESA Threatened), western bumble bee (*Bombus occidentalis,* CESA Candidate) and Aleppo avens (*Geum aleppicum*, California Rare Plant Rank 2B.2).

Comments and Recommendations
In March 2025, CDFW responded to the Lead Agency's request for comment on the Notice of Preparation[2] for the above referenced Project. CDFW offers the following comments and recommendations to further assist the Lead Agency in adequately identifying, avoiding, and minimizing potentially significant, direct, and indirect impacts on biological resources.

[2] https://ceqanet.lci.ca.gov/2025011078

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Deferral of Protocol Surveys

The DEIR defers surveys for western bumble bee and western pond turtle to a 14-day pre-construction window. CEQA discourages deferral of surveys essential for making informed impact assessments and prescribing most relevant avoidance, minimization and mitigation measures (CEQA Guidelines §15126.4(a)(1)(B):). CDFW recommends that the Lead Agency conditions protocol surveys for all species with potential to occur prior to Project approval. Survey results should inform avoidance and minimization measures included in the DEIR, while also including potentially applicable mitigation with clear performance standards, monitoring, and adaptive management. Without these survey results, the DEIR does not provide substantial evidence to adequately support its concluded impact assessment for these species. A2-2

Surveys prior to Project approval are particularly important for CESA-listed species like the CESA-Candidate western bumble bee, as this species has the potential to occur in the Project area during all life-cycle phases/year-round. The western bumble bee's potential to occur is not limited to the foraging/blooming season, as the DEIR infers, and impacts to a CESA-listed species may trigger a mandatory finding of significance (CEQA Guidelines §15065(a)(1)).

Bumble Bees

On September 30, 2022, the candidacy of four California bumble bee species was reinstated under the CESA, including the Western Bumble Bee (*Bombus occidentalis,* WBB), whose range bisects the Project area. As such, these bumble bees receive the same legal protection afforded to an endangered or threatened species (Fish and Game Code, §§ 2074.2 & 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt engage in any of these activities), possess, purchase, or sell CESA-listed species, or any part or product thereof (Fish and Game Code, §§§ 86, 2080, 2085). Western bumble bees were once common throughout most of California and the western United States however, research and analysis by the Xerces Society suggests there have been sharp declines in their relative abundance due to habitat disturbances, increasing temperatures, drought, and pesticide use. A2-3

Ground disturbance and land modification associated with the development of this Project has the potential to significantly impact local bumble bee populations if present, therefore, CDFW recommends a qualified biologist to conduct a thorough habitat assessment and protocol bumble bee surveys prior to Project approval. The proposed 14-day pre-construction survey may not align with the colony active period and does not include a sufficient number of surveys for results to be supported.

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Since the DEIR confirms potentially suitable habitat may occur throughout and adjacent to the Project area, CDFW recommends surveying and employing avoidance and minimization measures in accordance with CDFW's June 2023 Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species[3].

The bumble bee habitat assessment and survey results should be included in the Final EIR. Without appropriate avoidance and minimization measures, potentially significant impacts associated with Project ground- and vegetation-disturbing activities, include loss of foraging plants, changes in foraging behavior, burrow collapse resulting in entrapment or crushing in burrows, nest abandonment, reduced nest success, reduced health, and vigor of eggs, young, and/or queens, in addition to direct mortality, the latter being "take" as defined by Fish and Game Code section 86.

A2-3 (cont)

Please note, the survey considerations document indicates at least 3 on-site surveys conducted by qualified biologists spaced 2-4 weeks apart during the Colony Active Period. Additionally, the survey dates must consider the variability in resource use by the candidate species and floral resource phenology within the Project area. Generally, the WBB colony active period is April-September, but will vary within that window depending on the location, elevation, seasonal rainfall, average ambient air temperatures, and local seasonal weather conditions. According to the Bumble Bee Watch[4], a verified WBB observation occurred west of Susanville in August 2024.

Nesting Birds

The DEIR proposes pre-construction nesting bird surveys 14 days prior to the start of construction. CDFW recommends revising this avoidance and minimization measure to no more than seven days prior to the start of construction. Since birds can establish new nests in a matter of days, a survey conducted 14 days before construction may no longer reflect current conditions, leading to missed active nests. Generally, CDFW recommends the following to avoid potentially significant impacts to nesting birds:

A2-4

To avoid impacts to nesting birds protected under Fish & Game Code Sections 3503 and 3503.5 and the federal Migratory Bird Treaty Act, one of the following should be implemented:

[3] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline
[4] https://www.bumblebeewatch.org/

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a) Vegetation removal, land modification and ground-disturbing activities should occur between September 1 and January 31, when birds are not anticipated to be nesting; or

b) If vegetation removal, land modification and ground disturbing activities must occur during the nesting season, a pre-construction nesting bird survey should be conducted by a qualified biologist to identify active nests in and adjacent to the Project area.

Surveys should begin prior to sunrise and continue until vegetation and nests have been sufficiently observed. The survey should consider acoustic impacts and line of sight Project disturbances to determine a sufficient survey radius to maximize observations of nesting birds. A nesting bird survey report should be prepared and, at a minimum, the report should include a description of the area surveyed, date and time of the survey, ambient conditions, bird species observed, a description of any active nests observed, any evidence of breeding behaviors (e.g., courtship, carrying nest materials or food, etc.), and a description of any outstanding conditions that may have impacted the survey results (e.g., weather conditions, excess noise, presence of predators).

A2-4 (cont)

If an active nest is located during pre-construction surveys, a non-disturbance buffer should be established around the nest by a qualified biologist in consultation with CDFW and U.S. Fish and Wildlife Service to comply with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists.

Nesting bird surveys should be conducted no more than one week prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction nesting bird survey, the site should be resurveyed.

<u>River and Riparian Protection</u>

A buffer distance is not clearly stated in Mitigation Measure 3.3-3 to avoid and minimize impacts from Project activities on the Susan River and its associated riparian habitat. CDFW recommends a minimum buffer of 100-feet for construction disturbance and permanent development from the Susan River riparian corridor to better protect ecological function and wildlife from indirect impacts commonly associated with travel centers, such as concentrated lighting and increased noise regimes.

A2-5

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Additionally, the DEIR indicates using flagging or high visibility fencing to demarcate a boundary of riparian habitat. CDFW recommends against the use of high visibility fencing due to the risk of obstruction to terrestrial wildlife connectivity and potential for entanglement. CDFW recommends revising Mitigation Measure 3.3-3 to remove fencing for demarcation by using flagging and identifying boundaries clearly in the construction drawings and contractor work plans.

A2-5 (cont)

Wildlife Friendly Fencing

The DEIR indicates an old, barbed wire fence currently surrounds the parcel. CDFW understands fences are essential for human safety and the control of livestock, however, inappropriately designed and/or installed fencing may create serious hazards for wildlife. Therefore, CDFW encourages the Lead Agency to consider designing and constructing perimeter fencing with wildlife friendly fencing techniques to reduce the potential of injury or death. Please consult A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind[5] for construction recommendations and use of wildlife friendly fencing. CDFW staff are also available to assist in providing further recommendations for effective wildlife friendly fencing techniques.

A2-6

Noxious Weed and Invasive Species Management

The DEIR acknowledges noxious weeds and invasive plant species occur throughout the Project area but does not include a plan to prevent spread during construction. DEIR NR29 Policy on page 133 states: "*The County supports strong measures to eliminate or prevent the spread of invasive and noxious weeds and plant species including, but not limited to, medusahead, yellow starthistle, and perennial pepperweed (whitetop), and to control the adverse effects from the excessive spreading of such species as juniper and cheatgrass*".

CDFW recommends including an Invasive Species Prevention and Management Plan in the final EIR that includes pre-construction mapping, clean-equipment protocols, weed-free materials and any proposed noxious weed treatment. Without this plan, the Project risks exacerbating invasive species impacts on nearby sensitive habitats.

A2-7

Pesticide Use

If treating noxious weeds or invasive species includes applying pesticides:

[5] https://fwp.mt.gov/binaries/content/assets/fwp/conservation/land-owner-wildlife-resources/a_landowners_guide_to_wildlife_friendly_fences.pdf

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- Follow the best management practices described by the Guidance to Protect Habitat from Pesticide Contamination[6].
- Avoid using pesticides marked with the US Environmental Protection Agency's bee hazard icon.
- Avoid spraying pesticides onto any flowering plant.
- Use pesticides with a short residual toxicity to bees; bee pesticide toxicity can be checked via UC ANR's Bee Precaution Database[7].
- Use targeted application instead of broadcast spraying whenever possible.
- Avoid mixtures of pesticides as they are only evaluated in scenarios in which they are not mixed; thus, potentially harmful synergies are unknown.
- All pesticide applications must be conducted by a Licensed and Certified Pesticide Applicator and should be used as directed by the manufacturer.

Additional guidance on this topic is offered by Xerces Smarter Pest Management: Protecting Pollinators[8], the United States Environmental Protection Agency[9] and the California Department of Pesticide Regulation[10].

A2-7 (cont)

California Endangered Species Act

The Project has the potential to impact CESA-listed species. Please be advised that a CESA Incidental Take Permit[11] must be obtained if the Project has the potential to result in "take" (hunt, pursue, catch, capture, kill, or attempt thereof) of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project has the potential to result in take of a CESA-listed species, early consultation is encouraged, as significant modification to the Project may be necessary to minimize and fully mitigate impacts as required by Fish and Game Code section 2081(b)(2).

A2-8

[6] https://xerces.org/sites/default/files/2019-10/16-024_01_XercesSoc_Guidance-to-Protect-Habitat-from-Pesticides_web.pdf
[7] https://www2.ipm.ucanr.edu/beeprecaution/
[8] https://xerces.org/publications/fact-sheets/smarter-pest-management-protecting-pollinators-at-home
[9] https://www.epa.gov/pollinator-protection/epa-actions-protect-pollinators
[10] https://www.cdpr.ca.gov/enforcement/
[11] https://wildlife.ca.gov/Conservation/CESA/Permitting

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Lake and Streambed Alteration Agreement

Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of the bed, channel, or bank of any river, stream, or lake; or
- Substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

To obtain information about the 1602 Notification process, please access the Lake and Streambed Alteration Program[12].

A2-9

Submitting Data

CEQA requires that information developed in environmental documents is incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during surveys to the California Natural Diversity Database[13] (CNDDB).

A2-10

Promoting Collaboration

CDFW is charged with preserving and protecting the state's diverse ecosystems and wildlife; therefore, CDFW maintains a strong commitment to collaborate with other state agencies. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization strategies for the benefit of California's sensitive resources and aligning regulatory frameworks.

A2-11

[12] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA
[13] https://wildlife.ca.gov/Data/CNDDB

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Conclusion

CDFW appreciates the opportunity to comment on the DEIR and to assist the Lead Agency in identifying, avoiding, minimizing, and mitigating potentially significant Project impacts to biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

A2-12

Sincerely,

DocuSigned by:
Tina Bartlett
1D82ADE7393A74...

Tina Bartlett, Regional Manager
Northern Region

ec: State Clearinghouse
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Erika Iacona, CDFW
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Letter A2 California Department of Fish and Wildlife

Tina Bartlett, Regional Manager, Northern Region
January 26, 2026

A2-1 This comment introduces CDFW's role, provides a summary of the project description and the biological setting for the project and notes that CDFW responded to the project's Notice of Preparation in March 2025.

As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-2 This comment contends that the Draft EIR defers surveys for western bumble bee and western pond turtle to a 14-day pre-construction window, noting that CDFW recommends that the Lead Agency conditions protocol surveys for all species with potential to occur prior to project approval. The comment also notes impacts to California Endangered Species Act (CESA)-listed species may trigger a mandatory finding of significance.

Please refer to Chapter 3.3, *Biological Resources*, of the Draft EIR for a discussion of biological resources impacts, including potential impacts to western bumble bee and western pond turtle. The study area for biological resources impacts includes the project site and adjacent surrounding area, including the Susan River, even though no project activities are planned within the Susan River corridor. As described in Table 3.3-3, *Special-Status Wildlife Known to Occur in the Project Region and their Potential to Occur in the Study Area*, western bumble bee may occur in the study area because it contains floral resources and potentially suitable nesting sites. Similarly, western pond turtle may occur in the study area because it contains the Susan River and potentially suitable basking sites and upland habitat for egg-laying. The Draft EIR concluded that these special status species may have the potential to occur within the study area based on guidance in CDFW's comments on the NOP and multiple biological resources surveys including initial reconnaissance-level survey for biological resources and habitat assessment for Carson wandering skipper conducted by Ascent biologists on June 27, 2024, botanical surveys conducted on June 16 and 17, 2025, and bird surveys conducted on April 21-22, May 11-12, and June 2-3, 2025. Additionally, field surveys for the aquatic resources determination were conducted on April 7 and 8, 2025. During these surveys, which took place over two years and within the Colony Active Period for western bumble bee (CDFW 2023), no western bumble bees or western pond turtles were observed within the study area. Additionally, the quality of potential habitat for both species was determined to be low. Nectar sources in the study area occur only in small patches with low numbers of plants along the Susan River, and the Project site does not contain any typical nectar plants suitable for the western bumble bee. Similarly, the Susan River has steep, vertical banks that would prohibit western pond turtles from climbing from the river onto the project site. The ditches/basins to the south of the project site provide limited resources for western pond turtle (e.g., basking sites, grassy banks) and are unlikely to support a breeding population. Despite neither species being observed during the surveys and relatively low quality of habitat for the two species in the study area limited to the Susan River corridor, the Draft EIR conservatively included pre-construction surveys for both species to ensure that no significant impacts would occur.

Accordingly, and contrary to the commenter's assertion, the Draft EIR does not impermissibly defer mitigation. The mitigation measures regarding the western bumble bee and western pond turtle were incorporated into the project under an abundance of caution and chiefly based on California Natural Diversity Database (CNDDB) list of species with the *potential* to occur. As specified under CEQA Guidelines section 15126.2, subdivision (a): "In assessing the impact of a proposed project on the environment, the Lead Agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published…." The surveys described above established the existing physical conditions in the study area, did not identify either western bumble bee or western pond turtle within survey area and found no suitable habitat within the project site for either species. In addition, per CEQA Guidelines Section 15151, "[a]n evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Nevertheless, because foreseeing the unforeseeable is not possible, the Draft EIR

conservatively concluded that the potential for impacts to both species could not be completely eliminated and suggested mitigation, including pre-construction surveys (to confirm whether the prior surveys conclusions that neither species are present remains true) and, if necessary, avoidance measures.

Accordingly, the mitigation measures proposed do not impermissibly defer mitigation; they are no different in application to that suggested by CDFW in Comment A2-4 regarding nesting bird surveys occurring seven days prior to the initiation of construction activities. This is in alignment with CEQA Guidelines Section 15126.4(a)(1)(B) "[t]he specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review."

With regard to CDFW's comment on mandatory finding of significance, the assessment of the topics outlined in CEQA Guidelines Section 15065(a)(1) has been considered in the Draft EIR, see Section 3.3.3. No changes to the Draft EIR are proposed and no further response is required.

A2-3 This comment notes that four California bumble bee species were reinstated under CESA and contends that ground disturbance and land modification associated with the project has the potential to significantly affect local bumble bee populations, if present. The comment contends the proposed 14-day pre-construction survey may not align with the colony active period and does not include a sufficient number of surveys for results to be supported. CDFW recommends surveying and employing avoidance and minimization measures in accordance with CDFW's Survey Considerations for Candidate Bumble Bee Species (CDFW 2023).

See Response to Comment A2-2 above regarding the EIR's analysis of the Project's potential impacts to western bumble bees including prior surveys during the colony active period and the low potential for western bumble bees in the survey area. Additionally, Mitigation Measure 3.3-2b is revised as follows:

Mitigation Measure 3.3-2b: Conduct ~~Focused~~ Protocol Level Western Bumble Bee Surveys and Establish Protective Buffers

- ~~Within 14 days before commencement of project activities, a qualified wildlife biologist with familiarity with western bumble bee and experience using survey methods for the species shall conduct focused surveys of habitat suitable for the species within the project site.~~
- A qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a habitat assessment and focused survey (if the habitat assessment indicates that a survey is necessary) for western bumble bee following the methods in *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023) before the start of any ground-disturbing activities. Surveys shall be performed when western bumble bee is most likely to be identified, typically from April through September (i.e., the colony active period) when floral resources and ideal weather conditions are present.
  - Non-Invasive Surveys: non-invasive focused surveys would include the use of cameras to photograph bumble bees. Photographs would be reviewed and verified by a qualified individual to identify the bumble bees to species. Permits are not required for non-invasive surveys.
  - Non-Lethal Capture Surveys: surveys that would include capturing bumble bees for identification purposes and subsequently releasing the bees, would require a Memorandum of Understanding (MOU) from CDFW. No capture surveys will be conducted before the surveyor obtains an MOU. Prior to conducting non-lethal capture surveys, the applicant will provide the surveyor's qualifications and survey methodology to CDFW for review and approval.
- For any non-lethal capture surveys, the project applicant will submit a survey report to CDFW within 1 month of survey completion and will notify CDFW within 24 hours if western bumble bees are detected.

- If ~~no western bumble bee is found,~~ western bumble bees are not detected during focused surveys, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation will be required.
- If ~~western bumble bee is found,~~ western bumble bees are detected during the focused survey, appropriate avoidance measures will be implemented. ~~, impacts to western bumble bee shall be avoided by establishing exclusion zones around occupied nests and floral resources within 100 meters of nests during the breeding/flight season of April-August.~~ Avoidance measures may include, but are not limited to, the following:
  - Protective buffers will be implemented around active nesting colonies until these sites are no longer active as determined by a qualified biologist. A qualified biologist, in consultation with CDFW, will determine the appropriate buffer size to protect nesting colonies; however, buffers will typically be at least 50 feet.
    - If impacts on western bumble bee cannot be avoided, compliance with CESA and consultation with CDFW is required and may involve acquiring an incidental take permit (ITP) from CDFW. The project applicant will implement all avoidance measures included in the ITP.

A2-4 This comment recommends amending Mitigation Measure 3.3-2a relating to pre-construction nesting bird surveys to seven (7) days as opposed to the 14 days outlined in the mitigation measure. The comment also provides details on how to avoid impacts on nesting birds and survey requirements.

In response to this comment, Mitigation Measure 3.3-2a, second and fourth bullets, will be revised as follows:

Mitigation Measure 3.3-2b: Conduct Focused Surveys for Other Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers

- To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., vegetation clearing, ground disturbance, staging) should be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist). If project activities are conducted during the nonbreeding season, no further mitigation would be required.
- Within ~~14~~ 7 days before the onset of any project activities to be implemented during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with the birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native bird nests. Surveys shall be conducted in accessible areas within 0.25 mile of the project site for bald eagles, golden eagles, and Swainson's hawks, within 500 feet of the project site for other raptor species and special-status birds, and within 50 feet of the project site for non-raptor common native bird nests.
- If no active nests are found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant, CDFW, and the City of Susanville, and no further mitigation would be required.
- If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers, in consultation with CDFW, around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically would be 0.25 miles for bald eagle and golden eagle, and 500 feet for other raptors and special-status birds (e.g., bank swallow). Buffer size for non-raptor common bird species would be determined by a qualified biologist. Factors to be considered for determining buffer size would include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise

and human activity, species sensitivity, and proposed project activities. Generally, buffer size for common bird nests would be at least 20 feet. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for individuals of a species listed as endangered or threatened under the Endangered Species Act or the California Endangered Species Act or that is a candidate for listing under the California Endangered Species Act would require consultation with CDFW and/or USFWS, depending on the species' legal status. Periodic monitoring of the nest by a qualified biologist during project activities would be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

- Removal of bald eagle and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald eagle or golden eagle nests are found during focused surveys, then the nest would not be removed.

A2-5 This comment notes that a buffer distance is not clearly stated in Mitigation Measure 3.3-3 to avoid and minimize impacts from project activities on the Susan River and recommends a 100-foot buffer for construction disturbance and permanent development from the Susan River riparian corridor. The comment also notes CDFW recommends against the use of high visibility fencing due to the risk of obstruction to terrestrial wildlife connectivity and potential for entanglement. CDFW recommends revising Mitigation Measure 3.3-3 to remove fencing for demarcation by using flagging and identifying boundaries clearly in the construction drawings and contractor work plans.

Please refer to Chapter 3.3, *Biological Resources*, of the Draft EIR for a discussion of biological resources impacts, including potential impacts to Riparian Habitat or other Sensitive Natural Communities. As described in the Draft EIR, there is no riparian habitat within the project site, but Montane riparian habitat is present along the Susan River. The only project activities that could potentially impact riparian habitat is the construction of off-site utilities. As stated in the EIR, due to potential construction of off-site utilities on the banks of the Susan River and a distributary stream, there is the possibility for removal of riparian vegetation, modification of stream banks, or incidental deposition of materials into stream channels during construction, including during installation of bore locations if it is necessary to bore under the river. The Project Description, however, clarifies that utilities would be trenched either side of the Susan River but would be pumped through a pipe that would be hung from the side of the bridge on Skyline Road over the Susan River. Rather than specifying an arbitrary buffer distance, and due to the relatively discreet construction area required for hanging the utilities off the bridge over the Susan River, the requirement for a qualified biologist to demarcate the extent of riparian habitat present on the banks and establish a no-disturbance buffer outside the dripline of the riparian vegetation is sufficient to protect riparian resources. However, in accordance with the recommendations to not use high visibility fencing, Mitigation Measure 3.3-3 will be revised as follows:

Mitigation Measure 3.3-3: Delineate Sensitive Natural Communities, Implement Avoidance Buffers, and If Needed, Compensate for Unavoidable Losses

- Prior to implementation of project activities on the banks of the Susan River or the distributary stream, a qualified biologist shall demarcate the extent of riparian habitat present on the banks and establish a no-disturbance buffer outside the dripline of the riparian vegetation using flagging ~~or high-visibility construction fencing~~ and identifying boundaries clearly in the construction drawings and contractor work plans. No vegetation removal or ground disturbing activities will occur within this buffer.

A2-6 This comment notes that CDFW encourages the Lead Agency to consider designing and constructing perimeter fencing with wildlife friendly fencing techniques to reduce the potential of injury or death.

The comment will be considered by project decisionmakers, however, as the comment suggests modifications to the existing environment and the project design and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-7 This comment notes that although the Draft EIR acknowledges the presence of noxious weeds and invasive plant species, it does not include a plan to prevent their spread. CDFW recommends including an Invasive Species Prevention and Management Plan in the Final EIR. This comment also recommends following CDFW's guidance if using pesticides for treating noxious weeds or invasive species.

As explained in the Draft EIR, the project site and study area are already dominated by invasive plant species, which are part of the baseline environmental conditions. Moreover, construction of the project would create impervious surfaces upon which invasive plants would not establish. Thus, the project would reduce invasive plant species compared to the existing environment. As the existence of invasive species in the study area is part of the baseline and the project would reduce the presence of such species on the development site, the comment does not raise any new significant environmental issue. Noxious weed control is a standard construction-management practice, and the construction Contractor will control, kill, and remove noxious weeds and invasive plants from within the project limits per standard conditions of approval/best management practices. As such the comment is noted, but no further response is required at this time. Regarding the use of pesticides, please refer to the Initial Study, included as Appendix A to the Draft EIR, which analyzed potential impacts related to Hazards and Hazardous Materials and concluded that the Project would not have any significant Hazards and Hazardous Materials impacts. As explained in the Initial Study, all potentially hazardous materials used during construction of the project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Accordingly, the comment will be considered by project decisionmakers, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-8 This comment notes that an a CESA Incidental Take Permit must be obtained prior to the "take" of a CESA-listed species.

As noted within the Draft EIR, no take of CESA-listed species is considered likely. Moreover, the revisions to Mitigation Measure 3.3-2b discussed above acknowledge that, if avoidance of western bumble bee is not possible, compliance with CDFW's ITP process may be required. The comment will be considered by project decisionmakers, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-9 This comment provides detail on the Lake and Streambed Alteration Agreement (LSAA).

Details of the potential requirement of an LSAA are outlined in Section 3.3.3 of the Draft EIR. The comment will be considered by project decisionmakers, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-10 This comment requests that any special-status species and natural communities detected during surveys be reported to CNDDB in accordance with Public Resources Code Section 21003.

The comment is noted and will be considered by project decisionmakers, but as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-11 This comment notes that CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization strategies.

The comment will be considered by project decisionmakers, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A2-12 This comment is a conclusion noting CDFW appreciates the opportunity to comment on the Draft EIR and to assist the Lead Agency in identifying, avoiding, minimizing, and mitigating potentially significant project impacts to biological resources and provides contact details for CDFW.

The City acknowledges the contact information for CDFW for future reference during the environmental review process. Since this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter A3

From: Battles, Michael@DOT <Michael.Battles@dot.ca.gov>
Sent: Wednesday, January 28, 2026 12:39 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Cc: Grah, Kathy M@DOT <kathy.grah@dot.ca.gov>; Clark, Skip@DOT <Skip.Clark@dot.ca.gov>; Babcock, Kelly M@DOT <kelly.babcock@dot.ca.gov>
Subject: Susanville Travel Stop DEIR--Caltrans District 2 Comments

Good afternoon,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the proposed Susanville Travel Stop. Caltrans District 2 would like to provide the following comments:

- **Hydraulics Comments-**The project proponent must provide a grading plan and a drainage report demonstrating that the project will not have negative impacts to the state highway and its drainage features. The report must include an analysis of the proposed retention feature (s). Caltrans' criteria for a drainage report is attached. Additionally, Caltrans would like to drop our prior request for a flood study

A3-1

- **Permits and Structures-**Pressurized sewer lines are considered high-priority utilities and must go through the QMAP review process, which is led by DES, who will conduct the review and provide any design-related comments. Caltrans recommends attaching any utility to Caltrans structure be a last resort, with the options listed in the "Analysis of Alternatives" attachment being considered first. Alternative "C" is the preferred option by Caltrans, as it avoids the structures entirely.
    - As this is a high-pressure facility, an Encroachment Policy Exception is required
    - Regarding the proposed attachment locations, neither option is allowed:
        - **EX-1:** Attaching a sewer line to the barrier is not permitted due to the risk of damage if the barrier is struck during a crash
        - **EX-2:** Attaching to the superstructure is not permitted

A3-2

1. **Traffic Operations-**

1. *The Section 2 – SR 36 Study Area Safety Features and Collision History* (page 30) is incomplete and does not provide the necessary information or considerations. Please fill out and send the Crash Data on State Highway System Request Form provided (see attached) to request collision history from Caltrans. Once provided, please incorporate and update the Collision History to include the findings from the Crash Data Report. A3-3

2. *Under Section 2 – Project Description – SR 36/Skyline Road Intersection Improvements* (page 35-36) Caltrans prefers Alternative 2 with 8 phase signaling, which requires an auto-turn analysis for STAA trucks. Update the relevant sections of the TIAS to align with Caltrans' preference for Alternative 2. A3-4

3. Section 3 – *Project Travel Characteristics (page 35-50)*. Please include the referenced *Final Technical Paper: Love's Trip Generation and Travel Characteristic Study, (GHD, 2018)* in appendix for review to justify using lower-than average trip generation rates and higher-than-average pass-by-trip reductions. Caltrans will not approve trip generation or pass-by rates that deviate significantly from those specified in the Trip Generation Manual unless supported by additional documentation and included in the TIAS. If the technical paper is not provided, please revise the trip generation and pass-by trip assumptions to align with the acceptable standards outlined in the *Trip Generation Manual*. A3-5

4. *Section 3 – Project Travel Characteristics – Figure 6* (page 47). Intersections are inconsistent with mapping shown. Intersection 2 is shown as a dead end while intersection 3 is shown as a t-intersection. Verify labels, configurations, and correct travel counts for intersections. A3-6

5. *Section 3 – Project Travel Characteristics – 95th Percentile Queues at SR 6/Skyline Road Intersection – Existing Plus Project Conditions* (page 48-49). Please provide additional information for the Level of Service (LOS) at the SR-36 and Skyline Road intersection. For LOS analysis, the study must address the following scenarios:
    - Existing traffic volumes
    - Project-related anticipated traffic volumes.
    - Any pending project within the analysis which may influence traffic volumes or counts.
    - Combined conditions including existing, project-related, and pending project traffic volumes.
    - A 20-year traffic projection incorporating future anticipated volumes, the proposed project, and any pending projects.

    A3-7

6. Section 3 – *Project Travel Characteristics – Table 10: 95th Percentile Vehicle* A3-8

Queues at SR 36/Skyline Road Intersection – Existing Plus Project Conditions (page 49). If volume counts change, update TIAS to reflect vehicle counts and percentile queues. A3-8 (cont)

7. Section 5 – Impacts and Mitigation Measures – Cumulative Project Impacts and Mitigation Measures (page 59). Verify no pending projects within project location. If pending projects impact traffic analysis, include in findings in TIA. A3-9

8. Appendix – Provide supporting traffic count data. A3-10

9. To improve safety for pedestrians and cyclists, Caltrans requires the addition of a Class I bike path along the property frontage on State Route 36, similar to the existing path on Skyline Road. The path must be constructed in accordance with Highway Design Manual (HDM) and meet ADA accessibility requirements. Update the relevant sections of the TIAS to reflect Caltrans' requirement for a Class I bike path. A3-11

Thank you again for the opportunity to review and comment on the proposed Susanville Travel Stop.

Sincerely,

Mike Battles
Local Development Review Coordinator
Caltrans District 2

Letter A3 California Department of Transportation

Michael Battles, Local Development Review Coordinator, Caltrans District 2
January 26, 2026

A3-1 This comment thanks the City for the opportunity to review and comment on the Draft, and notes that a grading plan and a drainage report demonstrating that the project will not have negative impacts to the state highway and its drainage features must be provided. Caltrans' criteria for a drainage report was included as an attachment to their comment. In addition, Caltrans noted the rescinding of their previous request for a flood study.

As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR and is focused on construction requirements which are applicable to the detailed design phase, no further response is required.

A3-2 This comment notes that pressurized sewer lines are considered high-priority utilities and must go through the Quality Management Assessment Process, which is led by Caltrans' Division of Engineering Services (DES). The comment also notes that attaching any utility to a Caltrans' structure should be a last resort. The comment references an "Analysis of Alternatives" attachment, however, this attachment was not part of the Draft EIR and was part of a separate permitting discussion between the City and Caltrans. The Sanitary Sewer Service Alternatives Analysis Report is included as Attachment A to this Final EIR. The comment also notes that as a high-pressure facility, an Encroachment Policy Exception is required and that attaching a sewer line to a barrier is not permitted due to the risk of damage if the barrier is struck during a crash and attaching to the bridge superstructure is not permitted.

In regard to the sewer line positioning, a meeting was held between the applicant and Caltrans (Anthony Pascal) at 3:00pm on January 28, 2026, in which Caltrans were supportive of placing the sewer line on the overhang of the bridge. In addition, the utilities design will be fine-tuned as part of final designs for the project and would adhere to Caltrans' Project Development Procedures Manual – Chapter 17 Encroachments and Utilities (Caltrans 2022), in which it is noted that high priority utilities (including pressurized sewer lines) and gas lines of any pressure proposed to be placed on existing structures must also be reviewed and concurred by DES, in line with the Caltrans comment provided. In addition, Chapter 17 notes that:

> All utility encroachments on structures must be supported by a project specific analysis which shows the utility on the structure will not adversely affect the safety, design, construction, future widening, operation, maintenance, or stability of the structure and surrounding highway and meet the following conditions:
>
> - The proposed utility loads must not downgrade the ability of the structure to safely accommodate legal loads and/or transportation permits.
> - Shutoff valves for pressurized facilities must be installed outside State right of way, where feasible.
> - Utility maintenance is required no more than twice a year.
> - The utility is under the California Public Utilities Commission jurisdiction or is publicly owned and provides a dedicated service to the public.

Discussions with Caltrans regarding the locations of the utilities will be ongoing outside of the CEQA-process, as detailed design commences. The comment is noted and will be considered by project decisionmakers. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR and is focused on construction matters which are applicable to the detailed design phase, no further response is required.

A3-3 This comment contends that Section 2 – SR 36 Study Area Safety Features and Collision History of the Transportation Impact Analysis (TIA; Appendix I of the Draft EIR) was incomplete, does not provide the necessary information or considerations, and requests sending the Crash Data on State Highway System

Request Form to request collision history from Caltrans. However, the comment does not specify how the analysis was incomplete or lacked information and considerations other than requesting Caltrans' data.

As outlined in the TIA, Page 30, the collision history of the SR 36 corridor in the vicinity of Skyline Road was documented using the Transportation Injury Mapping System (TIMS) database. As explained in the TIA, the TIMS database is a free and publicly available dataset of reported injury collisions on local and state roadways. TIMS data was for the 7.5-year period from January 1, 2017 through June 30, 2024. This dataset provides numerous variables associated with each collision including time of day, day of week, date, primary collision factor, collision type, number of involved parties, collision severity, weather conditions, lighting, pavement conditions, involvement of bicyclist, pedestrian, or motorcycle, driver impaired, driver age and gender. The TIMS data also includes the latitude and longitude of each collision, allowing for spatial analysis of the data. The TIMS database classifies collisions as either fatal, severe, or injury-only. Per CEQA Guidelines Section 15151, "An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Accordingly, the City's use of the TIMS database was sufficient to determine the collision history for the SR 36/Skyline Road intersection and thus help determine the safety risk associated with the project. CEQA does not require the City to obtain substantially the same information from Caltrans as well, or adopt Caltrans data and methodology for analyzing the potential transportation impacts of the Project. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-4 This comment is on the TIA, Page 35-36, and notes that Caltrans prefers Alternative 2 with 8 phase signaling, which requires an auto-turn analysis for STAA trucks and requests updating the relevant sections of the TIA to align with Caltrans' preference for Alternative 2.

The TIA, Page 36 has been revised to reflect Caltrans' preference for signal phasing and lane configuration Alternative 2 as follows:

> ~~Caltrans has not expressed a preference of one geometric/signal phasing alternative over the other. But how the adjacent signal intersections along SR 36 near the study intersection operate may be an indication.~~
>
> ~~The SR 36/Riverside Drive intersection operates with split phasing on the side-streets despite protected left-turns being provided. The same is true for the SR 36/US 395/Richmond Road intersection to the south.~~
>
> ~~Despite what could appear to be Caltrans' preference for Alternative 1,~~ In their January 28, 2026 comment letter on the DEIR, Caltrans expressed a preference for Alternative 2. For documentation purposes, both alternatives are analyzed here in an equal level of detail.

However, while the TIA has been updated to reflect Caltrans' preference, the selection of either alternative is a design consideration and has no bearing on the adequacy of the Draft EIR and does not raise an environmental issue regarding the adequacy of the Draft EIR. Furthermore, use of the Autoturn software program to analyze STAA truck route swept path requirements will be performed as part of the encroachment permit process, in which detailed engineering drawings will be developed. These comments are noted and will be considered by project decisionmakers. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-5 This comment is on the TIA, Page 35-50, and requests inclusion of the referenced Final Technical Paper: Love's Trip Generation and Travel Characteristic Study, (GHD, 2018) in an appendix to the TIA to justify the trip generation rates and pass-by-trip reductions, noting Caltrans will not approve trip generation or pass-by rates that deviate significantly from those specified in the Trip Generation Manual unless supported by additional documentation and included in the TIA.

The referenced study has been added to Appendix B of the revised TIA (see Appendix I, Page 47 of this Final EIR). As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-6 This comment is on the TIA, Page 47, and contends that intersections are inconsistent with mapping shown. Intersection 2 is shown as a dead end while intersection 3 is shown as a t-intersection. Verify labels, configurations, and correct travel counts for intersections.

Page 47 of the TIA has been rectified, (see Appendix I, Page 47 of this Final EIR). As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-7 This comment is on the TIA, Page 48-49, and requests additional information for the Level of Service (LOS) at the SR-36 and Skyline Road intersection, noting the LOS analysis must address a number of scenarios.

Previously traffic congestion levels (known as LOS) were the main measurement to determine significant environmental impacts of development and transportation projects, however, Senate Bill 743 (SB 743) changed this and transportation effects are now measured according to the overall amount that people drive (known as vehicle-miles traveled, or VMT). As set out in CEQA Guidelines Section 15064.3, VMT is the most appropriate measure of transportation impacts and as such, the TIA thus undertook a VMT study in accordance with CEQA Guidelines Section 15064.3. In addition, cumulative forecasts were not prepared due to declining traffic volumes, as trends outlined in the TIA, pages 51 through 53, indicate that there is less travel demand in the future than currently exists. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-8 This comment is on the TIA, Page 49, and notes that if volume counts change, Caltrans requests the TIA be updated to reflect vehicle counts and percentile queues.

As there were no changes to the traffic volumes for existing plus project conditions, there was no need to update the queuing analysis for this scenario. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-9 This comment is on the TIA, Page 59, and requests verification of no pending (cumulative) projects within the project location.

A cumulative impact assessment was undertaken as part of the Draft EIR (Section 4 Cumulative Impacts), with related projects outlined on Page 4-3, based on information provided by the City of Susanville and from Lassen County's website. As such, this request has already been undertaken within the body of the Draft EIR, see pages 4-1 through 4-12. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-10 This comment is on the TIA, Appendices and requests supporting traffic count data.

The revised TIA includes the traffic count data in Appendix A (see Appendix I of this Final EIR). As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

A3-11 This comment notes that to improve safety for pedestrians and cyclists, Caltrans requires the addition of a Class I bike path along the property frontage on State Route 36, similar to the existing path on Skyline Road. The path must be constructed in accordance with Highway Design Manual (HDM) and meet ADA accessibility requirements.

A Class I bike path on the west side of SR 36 along the project frontage is not required as a mitigation for a significant project impact, as the Draft EIR, Section 3.9, Transportation, did not identify a significant impact associated with bicycle and pedestrian safety. Nor does the comment provide any evidence of a potential impact to bicycle or pedestrian safety. In addition, there are no known land development proposals on the west side of SR 36 either north or south of the project site that the bike path would connect to. As the comment references the need for this improvement to conform with Highway Design Manual (HDM) and ADA accessibility requirements, this is considered a design detail to be resolved at the encroachment permit phase when detailed engineering drawings will be prepared. The comment is noted and will be considered by project decisionmakers. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I1

From: Elizabeth Norton <bobliz@live.com>
Sent: Tuesday, January 20, 2026 4:38 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Cc: Jolene Arredondo <jarredondo@cityofsusanville.gov>; bobliz@live.com <bobliz@live.com>
Subject: Susanville Travel Stop - public comments

Hi Dan and Jolene, thank you for the opportunity to comment on the draft EIR Susanville Travel Stop. The 8.5 x 11 drawings very small and to read, but I offer the following recommendations for the final analysis and design:

1. Include a larger pet walking area. Many truckers and other customers travel with their pets.
2. Include an outside picnic area with a few covered picnic tables for shade. People enjoy eating their meals outside.
3. Install an irrigation system to water the landscaped plantings. Plant and maintain trees throughout the site to soften the effect of acres of concrete, asphalt and stone.
4. Provide a minimum 8 ft. wide shaded sidewalk to provide bike/pedestrian access from the Travel Stop to the existing Skyline Path, a paved bike/pedestrian Class I path along the NW side of Skyline Road.

I1-1

5. This Travel Stop project should not encroach on the proposed rail trail from Richmond Road to SR 36. Planning for this trail segment was funded by the 2024-2025 Caltrans Sustainable Transportation Planning grant program. Planning will commence in 2026. The proposed rail trail is consistent with multiple plans that included substantial public involvement including the 2018 Corridor Management Plan for the Volcanic Legacy Scenic Byway (Appendix G). The rail trail is also listed as a high priority project in the 2022 Lassen County Active Transportation Plan (Figure 10), and the 2023-2043 Lassen County Regional Transportation Plan (Table B-1). The proposed rail trail is located within at 79.6 acre parcel that's for sale by its owner, Sierra Pacific Industries. Its current status is unknown and any future development in that area is subject to CEQA. The property has been identified as green space or a public park that would connect to Riverside Drive and the Susan River.

I1-2

6. There are large pools of standing water in the winter/spring where the proposed bioretention areas are located. I would enlarge their storage capacity over to the abandoned railroad grade and naturalize (grade) so it aligns with the setting.

I1-3

Thank you, again, for soliciting public comments.

Elizabeth Norton
530-251-7368

Letter I1 Individual

Elizabeth Norton
January 20, 2026

I1-1 This comment thanks the City for the opportunity to comment and notes that the drawings provided within the Draft EIR were difficult to read. The comment also provides recommendations for the final analysis and design of the project, including consideration of a larger pet walking area, an outside picnic area, use of an irrigation system to water the landscaped plantings and inclusion of shade trees, and to provide a shaded sidewalk to provide bike/pedestrian access from the Travel Stop to the existing Skyline Path.

The comment will be considered by project decisionmakers, however, as the comment suggests modifications to the project design and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I1-2 This comment suggests the project should not encroach on the proposed rail trail from Richmond Road to SR 36, noting the trail planning will occur in 2026 but its current status is unknown. The comment also contends the property has been identified as green space or a public park that would connect to Riverside Drive and the Susan River.

As noted in Section 3.9 of the Draft EIR, Transportation, the project has been designed in consideration of the future expansion of the Bizz Johnson Trail, and project site plans show the dedication of a 23-foot right-of-way along the southern project site frontage to accommodate the future implementation of the Class I facility extension. While the commenter asserts the 79.6 acre parcel has been identified as green space or a public park, the parcel is currently not zoned as such. Please refer to the Initial Study (included as Appendix A to the Draft EIR) which analyzed the potential land use and planning impacts of the Project. As explained in the Initial Study, the Lassen County General Plan and Area Plan Land Use designation for the project site, which is within the Susanville Vicinity Area Plan area, is Industrial Park. The Industrial Park designation is for limited industrial uses to be designed and laid out as a planned development with on-site services. The Lassen County General Plan/Area Plan for the Susanville Vicinity Area Plan area indicates principal land use designations and typical zoning districts or combinations of zoning districts which correspond to the designations. The project site has a typical corresponding zoning district of Limited Industrial District (M-L). In addition, the City is in the process of updating its land use and zoning designations, and as part of the annexation of the project site into the City of Susanville, the land use and zoning designations would change. Commercial Shopping Center would be the proposed general plan land use designation and General Commercial Shopping District (C-2) would be the proposed zoning. As such, if the City approves the project and makes the requested General Plan and zoning changes, the project would be consistent with the City's general plan and zoning land use designations upon annexation. The County's general plan and zoning designations would no longer be operative. The Initial Study concluded that the Project would not result in a significant impact due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As further noted in the Initial Study, operational sales tax revenue generated by the project would help fund future public facilities, potentially including parks. Furthermore, the project proposes to develop a 14.15-acre portion of the overall parcel, so a future public park or green space on the remainder of the parcel would not be precluded by the project development. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I1-3 This comment notes there are pools of standing water in the winter/spring where the proposed bioretention areas are located and to ensure their storage capacity is enlarged.

The comment will be considered by project decisionmakers, however, as the comment suggests modifications to the existing environment and the project design and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I2

From: Lorene Guffey <lguffey@abq.com>
Sent: Tuesday, January 27, 2026 3:22 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Potential truck stop

Hello, I would need more information on how this truck stop would impact local businesses already in the area before I could support or not support a truck stop in Susanvlle. It's exciting to think of the jobs it would provide and perhaps encourage longer stopovers or even route changes for truck and other drivers. But, at the same time, I can't help but think of the Mark and other local gas stations with convenience stores this could have an impact on, and my local businesses come first for me. I2-1

I do not have any natural resource or cultural concerns.

Lorene Guffey
Janesville
530-249-3275

Letter I2 Individual

Lorene Guffey
January 27, 2026

I2-1 This comment notes that the commenter would require more information on the economic impact of the project on local businesses and notes no natural resource or cultural concerns.

In addition to job creation, typically, travel stops provide consistent tax revenue to local jurisdictions through property taxes, sales taxes on convenience items such as hot food to-go, carbonated beverages, cigarettes, and allocated fuel tax revenues, as a portion of state-levied motor vehicle fuel taxes is transferred to local jurisdictions. Please see the Tax Guide for Gas Station Operators available at: https://cdtfa.ca.gov/industry/gas-station-operators/industry-topics.htm for more information on sales taxes applicable to fuel sales, which in turn can lead to economic benefits to the jurisdictions in which the facilities are located. However, per CEQA Guidelines Section 15064 (e) 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment'. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I3

From: Shaun Heard <shaun705@hotmail.com>
Sent: Wednesday, January 28, 2026 10:11 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel Stop EIR comments

Hi Dan, I'm concerned about the potential of flooding along the Susan River. Especially surrounding properties and buildings near the proposed site. Adding soil and fill to elevate the property properly could have an impact on other property owners in the future of flooding events. Many business could see this harmful impact. I3-1

Thanks! Shaun

Letter I3 Individual

Shaun Heard
January 28, 2026

I3-1 This comment notes the individual is concerned about the potential of flooding along the Susan River and surrounding properties and buildings near the proposed site. The comment also notes that adding soil and fill to elevate the property could have an impact on other property owners in the future during flooding events.

As noted within the Draft EIR Section 2, Project Description, the project would install storm drains and proposed project grading would also implement stormwater control/drainage and water quality features to prevent drainage and water quality impacts, which would include bioretention ponds and standard Best Management Practices (BMPs). Please refer to the Initial Study (included as Appendix A to the Draft EIR) for the analysis of potential Hydrology and Water Quality impacts. Specifically, pages 2-77 through 2-80 of the Initial Study analyze the Project's potential to substantially alter the existing drainage pattern of the site or area and concludes the Project would not have a significant impact and no mitigation is required. The site is indicated by FEMA as being in Zone X, a 0.2 percent annual chance flood hazard, areas of 1 percent annual chance flood with average depth less than one foot or with drainage areas of less than one square mile and are considered moderate flood hazard areas. The proposed bioretention basins and underground storm drain system would have adequate capacity to accommodate storm water runoff from the project site, which would be stored in the basin prior to infiltration. Therefore, the project would not impede or redirect flood flows. See page 2-79 of the Initial Study in Appendix A of the Draft EIR. No further response is required.

Letter I4

From: jhmckee021849@yahoo.com <jhmckee021849@yahoo.com>
Sent: Wednesday, January 28, 2026 10:10 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel Stop EIR comments

1. When trucks park for the night, they spew diesel fumes all night long, impacting air quality I4-1

2. More trucks in town and on 395! Do we really want that? On the other hand, with fuel prices much lower in Nevada, why would trucks stop here, so close to less cost? I4-2

3. When Walmart moved in, we lost many, many small businesses. What will Main St look like with gas stations and fast food closing? And possibly more local businesses? I4-3

4. Will there be electric capability for electric cars? I4-4

Julie McKee
jhmckee021849@yahoo.com
530-253-3100

Sent from Yahoo Mail for iPhone

Letter I4 Individual

Julie McKee
January 28, 2026

I4-1 This comment notes air quality impacts associated with trucks parking overnight.

Per the Air Quality analysis undertaken in the Draft EIR, Section 3.2, no significant impacts were associated with the project. The Draft EIR analyzed the potential air quality impacts associated with vehicle idling and concluded they would be minimal and limited to the time it takes vehicles to arrive and depart the fueling stations and parking areas. Additionally, regulations adopted by the California Air Resources Board (CARB) place general restrictions on truck idling. (Cal. Code Regs. tit. 13, §§ 2480 and 2485.) All trucks utilizing the project would comply with the law. As the commenter does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I4-2 This comment notes there will be more trucks in town and on US 395, noting the fuel price differential between Nevada and California would lead to a lack of customers at the proposed project site.

As noted in the Transportation analysis undertaken for the project, discussed in Section 3.9 of the Draft EIR, Transportation, the majority of project trips (90 percent of truck trips, 85 percent of auto trips to the travel stop: 40 percent, of fast food restaurant trips, and 50 percent of RV trips) are expected to be pass-by trips (e.g., a trip already on the adjacent roadway that enters a commercial center en route to a different primary destination). As such, and given the location of Susanville, the project analysis concluded that a substantial number of truck trips would not occur due to the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I4-3 This comment notes small businesses within Susanville closed due to the opening of a large national grocery/retail chain and questions whether more local businesses will close.

The comment will be considered and used to inform the City's decision regarding whether to approve the project. However, per CEQA Guidelines Section 15064 (e) 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment'. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I4-4 This comment asks if there will be electric capability for electric cars.

As noted within the Draft EIR Section 2, Project Description, the project would install electric vehicle chargers in accordance with the current CALGreen code at the time of building permit approval, but likely to be no less than three charging stations. As noted in Section 3.11 of the Draft EIR, there is sufficient capacity to power the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I5

From: B.T.McKee <705tombo@gmail.com>
Sent: Wednesday, January 28, 2026 8:38 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: proposed truck stop

Hi Dan... I have three questions regarding the proposed truck stop on the east border of Susanville:
-In looking to the future, will there be recharging stations for electric vehicles? I5-1
-Will diesel trucks be allowed to idle their engines for extended periods of time? Over the years I have observed that during summer months, truck drivers often idle their engines for hours on end while they sleep, presumably to keep their cabs air conditioned. I5-2
-What is the anticipated effect on the many gas stations up and down Main St? Susanville already has many vacant stores and business locations. Will the proposed truck stop result in more empty storefronts and business locations? I5-3

Barney McKee

Letter I5 Individual

Barney McKee
January 28, 2026

I5-1 This comment asks if there will be recharging stations for electric vehicles.

As noted within the Draft EIR Section 2, Project Description, the project would install electric vehicle chargers in accordance with the current CALGreen code at the time of building permit approval, but likely to be no less than three charging stations. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I5-2 This comment inquires whether diesel trucks will be allowed to idle their engines for extended periods of time.

Per California Air Resources Board (CARB) requirements and state law, diesel commercial vehicles (i.e. trucks) over 10,000 lbs cannot idle their primary engine for more than 5 minutes without risking a violation and penalty fee, unless they have a certified Clean Idle sticker. The 5-minute idle rule applies to vehicles that are not engaged in work activities. Vehicles may not idle auxiliary power systems for more than five minutes to power heaters, air conditioners or any other equipment if the vehicle has a sleeper berth and is within 100 feet of a restricted area (homes and schools). Idling of auxiliary power systems is allowed if the vehicle has a sleeper berth and is farther than 100 feet away from a restricted area. For details on air quality emissions and noise, please see Section 3.2, Air Quality and Section 3.8 Noise, of the Draft EIR. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I5-3 The comment inquires about the economic impact of the project on local businesses.

However, per CEQA Guidelines Section 15064 (e) 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment'. The comment will be considered and used to inform the City's decision regarding whether to approve the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I6

From: Jeff Hemphill <calrancher2002@yahoo.com>
Sent: Wednesday, January 28, 2026 12:37 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Travel Center.

Dan,

I believe the travel center will be a win win for our community. One point I like is that it will help the environment by having a place for the trucks to rest that is central and offers services. Right now the number of trucks that park along 395 north of the Horse Corrals is tremendous and who knows how much damage is being done to the roadside. I6-1

Thanks for your attention

Jeff Hemphill

Letter I6 Individual

Jeff Hemphill
January 28, 2026

I6-1 The comment is supportive of the project, noting it will be beneficial to the community.

The comment will be considered and used to inform the City's decision regarding whether to approve the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter
I7

From: jvcorey@frontiernet.net <jvcorey@frontiernet.net>
Sent: Wednesday, January 28, 2026 8:24 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: "Susanville Travel Stop"

To the honorable Mr. Dan Newton,

I do not live in the town of Susanville, but I live on the outskirts of town: 697-980 Gold Run Road.
My concern about this project is light pollution. I have seen many of these stations in my travels and my hope is that Susanville will use better judgement and not make this travel stop another glare in the Honey Lake Valley sky. I7-1

Please address this issue in your planning and discussions.

Thank you for your time and interest and listening to the community.

Yours truly,

Mrs. Janet Corey

Letter I7 Individual

Janet Corey
January 28, 2026

I7-1 The comment is concerned about potential light pollution from the project and requests that this issue is discussed in the City's planning and discussion process.

An assessment of light impacts is provided in Section 3.1, Aesthetics, of the Draft EIR, including a photometrics study. According to the project's photometrics plan (Figure 3.1-5), lighting levels would be 1 footcandle (10.76 lux) or less at the edges of the project site, before fading to 0.0 footcandles at the SR 36 right-of-way and by the former railroad embankment, at a distance of approximately 80 to 100 ft from the edge of the Project site. For comparison, 1 footcandle is approximately equal to twilight conditions and 0.1 footcandle is approximately equal to deep twilight conditions. As such, lighting levels would not be so bright as to cause substantial light that would adversely affect nighttime views from nearby sensitive receptors. Furthermore, applicable Backlight-Uplight-Glare (BUG) standards established by either the Illuminating Engineering Society (IES) or CALGreen code requirements related to light pollution reduction (see CALGreen 2022, Chapter 5, Section 5.106.8) would be adhered to, per Project Design Feature PDF-AES-1. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I8

From: Jennifer Hill <jenniferhill888333@gmail.com>
Sent: Wednesday, January 28, 2026 9:34 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel stop

Dear Dan Newton or Members of the City Council,

I am writing to express my support for the proposed travel stop being put in town.

I8-1

I believe this development will be a significant benefit to our local economy. Thank you for your time and for considering my comments on this matter.

Best regards, Jennifer Hill 555 n roop st susanville ca 96130

Letter I8 Individual

Jennifer Hill
January 28, 2026

I8-1 The comment expresses support for the project.

The comment will be considered and used to inform the City's decision regarding whether to approve the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I9

From: Cheyenne Powers <powersanne59@gmail.com>
Sent: Thursday, January 29, 2026 1:44 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel Stop

Dear Members of the City Council,

I am writing as a concerned resident to formally oppose the proposed development of the Susanville Travel Stop. Lassen County already experiences a significant volume of semi-truck traffic, and placing a large truck stop at the edge of town—directly across from established ranches—is inappropriate and deeply concerning.

One of the most serious issues is the impact this project would have on the quality of life and rural character of Lassen County. Our ranching areas are intentionally low-density and agricultural in nature. Introducing a truck stop in this location is incompatible with existing land use and would permanently alter the character of the area. I9-1

Noise and light pollution are also major concerns. Continuous engine noise, air brakes, idling trucks, refrigeration units, and overnight traffic would disrupt daily ranch operations and residents' peace, particularly during early mornings and nighttime hours. In addition, bright 24-hour lighting would negatively affect nearby homes, livestock behavior, and the natural landscape. Increased noise, lighting, and traffic place unnecessary stress on animals, which can impact their health, breeding cycles, and productivity—especially during breeding season —resulting in significant financial loss for ranchers due to infertility. I9-2

Heavy truck traffic would also increase dust and diesel emissions, which pose risks to livestock and can contaminate feed and water sources. Truck stops inherently carry a higher risk of diesel, gasoline, oil, and chemical spills, all of which can easily contaminate soil, groundwater, and adjacent grazing land. This raises serious questions about accountability: who will be responsible for cleanup and compensation if private wells or water sources become contaminated? I9-3

Water usage presents another major concern. Truck stops require large amounts of water, which could strain already limited local resources. Where will this water come from, and who will bear the cost? Will private water rights be compromised or groundwater depleted, ultimately harming long-established, locally operated ranches? I9-4

Additionally, there is a school located less than 350 yards from the proposed site. Increased heavy-truck traffic so close to children walking home or school buses unloading creates an unacceptable safety risk. The possibility of distracted or fatigued drivers in such close proximity to students is alarming. I9-5

Overall, this proposed development is dangerous and offers no meaningful benefit to ranchers or the residents of Susanville. Truck stops primarily serve transient traffic and provide minimal long-term value to the local community. Facilities of this nature are far better suited for locations near highways, industrial zones, or areas already designated for heavy commercial use—not directly adjacent to ranchland or directly in front of family-owned properties. I9-6

Finally, the additional traffic and activity generated by this truck stop would place further strain on local law enforcement, emergency services, and infrastructure. Our law enforcement agencies are already understaffed and overextended, and this project would increase demands without providing proportional community benefit. I9-7

For these reasons, I strongly urge you to reconsider approval of the Susanville Travel Stop in its proposed location. Please feel free to contact me if you have any questions or require further input. I9-8

Sincerely,
Cheyenne Powers
Susanville, CA
Phone: 530-260-6406

Letter I9 Individual

Cheyenne Powers
January 29, 2026

I9-1 The comment expresses opposition to the project and contends that as Lassen County already experiences a significant volume of semi-truck traffic, the location of the proposed travel stop is inappropriate. The comment notes that the project would have a negative impact on the quality of life and rural character of Lassen County and that the introduction of the travel stop in this location is incompatible with existing land use and would permanently alter the character of the area.

With respect to the commenter's claim that the project would impact the quality of life and rural character of Susanville, CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.'

Please refer to Response to Comment I1-2 and the Initial Study (included as Appendix A to the Draft EIR) which analyzed the potential land use and planning impacts of the Project. As explained in the Initial Study, the Lassen County General Plan and Area Plan Land Use designation for the project site, which is within the Susanville Vicinity Area Plan area, is Industrial Park. The Industrial Park designation is for limited industrial uses to be designed and laid out as a planned development with on-site services. The Lassen County General Plan/Area Plan for the Susanville Vicinity Area Plan area indicates principal land use designations and typical zoning districts or combinations of zoning districts which correspond to the designations. The project site has a typical corresponding zoning district of Limited Industrial District (M-L). In addition, the City is in the process of updating its land use and zoning designations, and as part of the annexation of the project site into the City of Susanville, the land use and zoning designations would change. Commercial Shopping Center would be the proposed general plan land use designation and General Commercial Shopping District (C-2) would be the proposed zoning. As such, if the City approves the project and makes the requested General Plan and zoning changes, the project would be consistent with the City's general plan and zoning land use designations upon annexation. The Project site would no longer be regulated under the County's general plan and zoning designations, as the City's regulation would apply. The Initial Study concluded that the Project would not result in a significant impact due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As part of the package or regulatory approvals required for the proposed project, the project applicant is requesting that the Lassen County Local Agency Formation Commission (LAFCO) approve the annexation of the site into the City of Susanville City Limits, which would take the site out of the current land use planning jurisdiction of Lassen County. LAFCO policies require that the annexation cannot be approved unless it is consistent with the City's General Plan and Sphere of Influence. The project proposes a General Plan Amendment from the existing Industrial Park General Plan designation to "General Commercial/Shopping Center" designation and to change the current County zoning of Limited Industrial District (M-L) to a City C-2 (General Commercial/Shopping Center District) designation, which is appropriate for the proposed uses.

As noted in the Transportation analysis undertaken for the project, discussed in Section 3.9 of the Draft EIR, Transportation, the majority of project trips (90 percent of truck trips, 85 percent of auto trips to the travel stop: 40 percent, of fast food restaurant trips, and 50 percent of RV trips) are expected to be pass-by trips (e.g., a trip already on the adjacent roadway that enters a commercial center en route to a different primary destination). As such, and given the location of Susanville, the transportation analysis concluded that the project would not cause a substantial increase in the number of truck trips. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-2 The comment notes that noise and light pollution are major concerns, noting that noise would disrupt ranch operations and residents' peace, particularly during early mornings and nighttime hours, and that 24-hour lighting would negatively affect nearby homes, livestock behavior, and the natural landscape. The comment suggests that increased noise, lighting, and traffic place unnecessary stress on animals, which can impact their health, breeding cycles, and productivity.

In terms of noise, Section 3.8 of the Draft EIR, Noise and Vibration, includes an assessment of noise generated by the project. In terms of both construction noise and operational noise (from transportation, and stationary equipment such as HVAC units, the drive-thru, and parking lot activity), there would be no significant impact. In addition, the Draft EIR includes an assessment of the noise levels from each operational source combined. The summation of the operational noise levels would result in a combined project noise level of 52.2 dBA Leq (dBA Leq measures the average acoustic energy over a period of time) and would not exceed the County's residential daytime, evening, and nighttime noise standards of 65 dBA Leq, 60 dBA Leq, and 55 dBA Leq, respectively, nor the City's Residential Land Use Compatibility Standards of 50-55 dBA. Therefore, the collective noise associated with the proposed operational sources would not exceed the applicable County noise standards. Noise generated from the project of 52.2 dBA Leq plus the existing noise levels of 52.7 dBA Leq would result in a combined noise environment of 55.5 dBA Leq, resulting in an increase of 2.8-dB. Based on the existing noise levels measured at 52.7 dBA Leq, a 5-dB increase would be the applicable threshold in which change would be considered substantial. Therefore, proposed noise sources associated with the project would not result in a substantial increase in noise. See Response to Comment I5-2 regarding truck idling restrictions.

In terms of light pollution, an assessment of light impacts is provided in Section 3.1, Aesthetics, of the Draft EIR, including a photometrics study. According to the project's photometrics plan (Figure 3.1-5), lighting levels would be 1 footcandle (10.76 lux) or less at the edges of the project site, before fading to 0.0 footcandles at the SR 36 right-of-way and by the former railroad embankment, at a distance of approximately 80 to 100 ft from the edge of the Project site. For comparison, 1 footcandle is approximately equal to twilight conditions and 0.1 footcandle is approximately equal to deep twilight conditions. As such, lighting levels would not be so bright as to cause substantial light that would adversely affect nighttime views from nearby sensitive receptors. Furthermore, applicable BUG standards established by either the IES or CALGreen code requirements related to light pollution reduction (see CALGreen 2022, Chapter 5, Section 5.106.8) would be adhered to, per Project Design Feature PDF-AES-1. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-3 The comment contends that increased heavy truck traffic would also increase dust and diesel emissions, which pose risks to livestock and can contaminate feed and water sources. The comment contends that truck stops inherently carry a higher risk of diesel, gasoline, oil, and chemical spills, all of which can easily contaminate soil, groundwater, and adjacent grazing land, and questions who is responsible for cleanup.

See Response to Comment I9-1 regarding the pass-by nature of most truck trips associated with the Project. Regarding air quality impacts associated with truck traffic, refer to Section 3.2 of the Draft EIR. Specifically, the Draft EIR analyzed air pollution emissions from vehicle traffic generated by the Project and concluded they would be substantially below the thresholds applied by the Lassen County Air Pollution Control District ("LCAPCD") resulting in a less-than-significant impact. Additionally, the Draft EIR analyzed emissions of Toxic Air Contaminants ("TACs") and Carbon Monoxide ("CO") from vehicle traffic and concluded that Project generated traffic would not have significant impacts with regard to either based on applicable thresholds.

Regarding Hazards and Hazardous materials, see Response to Comment A2-7 and the Initial Study, included as Appendix A to the Draft EIR, which analyzed potential impacts related to Hazards and Hazardous Materials and concluded that the Project would not have any significant Hazards and Hazardous Materials impacts. As explained in the Initial Study, all potentially hazardous materials used during operation of the project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. While there could be a greater number of diesel, gasoline, and oil spills than previously occurred on site, as the proposed uses do not currently exist, these spills do not pose a threat to soil or groundwater and adjacent grazing land as such spills, if they did occur, would occur on impervious surfaces. In addition, the Certified Unified Program Agency (CUPA) for the County of Lassen is the Lassen County Environmental Health Department, who are responsible for site inspections of underground storage tanks and aboveground

petroleum storage tanks, and for overseeing the Hazardous Waste Generator Program. The purpose of this program is to ensure that all hazardous wastes generated by businesses are properly handled, recycled, treated, stored, and/or disposed. Furthermore, the California Accidental Release Program (CalARP) is designed to minimize the risk of extremely hazardous substances that potentially cause immediate harm to the public and the environment. It requires the owner/operator of a business handling one or more regulated substance over the State and/or Federal threshold to evaluate and determine the potential impacts of an accidental release. Under the CalARP regulations these facilities must submit a Risk Management Plan (RMP) to the CUPA. The RMP determines the potential accidental factors; and preventative measures and safeguards are implemented into safe operations. RMP submissions include: safety information, process hazard analysis, hazard review, operating procedures, training, maintenance, compliance audits, incident investigations and other documentation supporting the implementation of the program.

Regarding groundwater quality issues, please refer to the Initial Study (included as Exhibit A to the Draft EIR) for the analysis of potential hydrology and water quality impacts. As discussed in the Initial Study, per the terms of the National Pollutant Discharge Elimination System (NPDES) permit that will be required for the project, limits are imposed on allowable concentrations and mass loadings of pollutants contained in the discharge. In addition, California also mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of Best Management Practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit. During construction, per the NPDES Construction General Permit, the project would be required to implement a SWPPP that includes BMPs to reduce pollutants in stormwater runoff from the project site. The SWPPP would include site design measures to minimize offsite stormwater runoff that might otherwise affect surrounding habitats. The Lahontan Regional Water Quality Control Board would review and monitor the effectiveness of the SWPPP through mandatory reporting by the city and the contractor as required. The installation of proposed storm drains, bioretention basins, and project grading would result in stormwater control and prevent drainage and water quality impacts. In addition, any underground tanks would be installed per US Environmental Protection Agency (USEPA) requirements, noting that tanks and piping installed or replaced after April 11, 2016, must be secondarily contained (i.e. double-walled) and use interstitial monitoring, which is, in effect, a leak detection system. Thus, the project would not pose a threat to groundwater.

Although not related to the project, in terms of payment for cleanup, US law determines that the principle polluter pays, so any cleanup costs would be borne by the operator of the facility. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-4 The comment asserts that truck stops require large amounts of water, which could strain already limited local resources and questions where the water will come from, and whether private water rights will be compromised or groundwater depleted.

As outlined in the Initial Study (Appendix A of the Draft EIR), during operation, the travel stop would have an estimated water demand of approximately 7,000 to 9,000 gallons per day (gpd) or 7.8 to 10.1 acre-feet per year (AFY). As identified in the City of Susanville's Urban Water Management Plan the city has a water source annual capacity of 2,785.70 million gallons (or approximately 9,948 acre feet), with more in wet years (approximately 49 percent more). The city thus has ample water rights and capacity for the projected future demand of the project (7.8 to 10.1 AFY), as well as existing and future demand of other residential and commercial consumers. The project water use from the travel stop would thus be 0.1 percent of the available annual capacity. In addition, it should be noted that there is no carwash and no wash station available for RVs or trucks associated with the project, which further minimizes the project's water demand and usage. Additionally, the Initial Study analyzed whether the Project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge. As noted above, the project's operational water use would be supplied by connecting to City infrastructure, which is primarily served by two natural

springs. Further, given there is no existing water main connection to the site, it is likely water will be brought in by trucks to supplement construction needs rather than constructing a well and using groundwater. The Initial study concluded that the Project would not significantly impact groundwater supply or recharge. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-5 The comment notes there is a school within 350 yards of the project site and asserts that the increase in heavy-truck traffic close to children walking home or school buses unloading creates an unacceptable safety risk.

Per GPS mapping, there are no schools within 350 yards of the project site; regardless, Section 3.9 of the Draft EIR, Transportation, determined that there would be no transportation hazard associated with the project. The roadway network surrounding the project site is already used by large trucks, and the types of vehicles accessing the project site during operation (e.g., personal vehicles, large trucks) would be consistent with those using the roadway under existing conditions. See also Response to Comment I9-1 regarding truck trips generated by the Project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-6 The comment contends that the proposed development is dangerous and offers no meaningful benefit to ranchers or the residents of Susanville. The comment also notes that facilities of this nature are far better suited for locations near highways, industrial zones, or areas already designated for heavy commercial use.

See Response to Comment I1-2 and I9-1 regarding the Project's consistency with the applicable zoning. Additionally, the unsupported claim that the project is "dangerous" and lacks sufficient benefits does not raise a significant environmental issue. CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.' To the extent that general concerns with safety do relate to environmental concerns, the Draft EIR, including the Initial Study analyzes the Project's potential impacts regarding air quality, hazards and hazardous materials, water quality, and transportation safety. See Response to Comment A3-3, A3-9, I9-3, and I9-4 for discussions of these issues. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-7 The comment notes the additional traffic and activity generated by the project would place further strain on local law enforcement, emergency services, and infrastructure.

The Initial Study undertaken in support of the project (Appendix A of the Draft EIR) determined that the proposed project would not contribute to population growth that would substantially increase the demand for public services such as law enforcement or fire protection. The periodic increase in visitors to the project site would constitute an increase in the service population and could lead to a greater demand for police services, fire prevention, medical assistance, or emergency response. However, it was determined that this demand would not substantially affect Susanville Police Department or Susanville Fire Department's existing service ratios or response times. In addition, operational sales tax revenue generated by the project would help fund existing and future law enforcement, emergency services, and infrastructure needs. See also Response to Comment I9-1 regarding truck trips generated by the Project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I9-8 The comment strongly urges the City to reconsider approval of the Susanville Travel Stop.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I10

From: Claudia Dunlavy <lassenclaudia@gmail.com>
Sent: Friday, January 30, 2026 11:33 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Travel stop

What company will be running it? I am concerned that in town there is a monopoly already on gas and convenience stores along Main Street. It upsets me because there is not much competition to incentivize lower gas prices for the regulars that live here. I10-1

Also- would this completed project bring on more noise and light pollution? jake brakes, big lights in parking areas, crime? I10-2

And one more thing- we have big areas and some stores that have been abandoned, are not selling, sitting there and rotting. How bout we repurpose these spaces? The city needs clean up and good support of "clean businesses."

Please consider these questions and concerns I have. We need to bring hope to our town, beautify it and pick project to promote people to Stay here and build up our community for good. I10-3

Claudia

Letter I10 Individual

Claudia Dunlavy
January 30, 2026

I10-1 The comment questions which company will be running the project and notes concern that there is a monopoly with gas and convenience stores along Main Street, and there is not enough competition to incentivize lower gas prices.

As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I10-2 The comment questions whether there would be more noise and light pollution and crime.

In terms of noise and light pollution, see Responses to Comments I7-1 and I9-2. In terms of crime, please see Response to Comment 19-7. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I10-3 The comment notes repurposing spaces in the City that have been abandoned should be considered, and that the commenter wants the City to promote people to stay and build up the community.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter
I11

From: krishan kumar <usakrishan@yahoo.com>
Sent: Friday, January 30, 2026 2:04 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susannville travel stop

Hello sir this is krishan Kumar. I am not agree to with this truck plaza in town . Because already have too much competition with gas price in town . Already have so many Tweaker in each street and corner in town . So many drugs dealers in town we don't want more crowd in susanville . We have 10 gas stations in town if this happened they will loose there business.Pls don't let it come thanks.
Sent from my iPhone

I11-1

Letter I11 Individual

Krishan Kumar
January 30, 2026

I11-1 The comment opposes the project, citing increased competition and crime.

The comment will be used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I12

From: Ramesh Turen <susanvillestores@gmail.com>
Sent: Friday, January 30, 2026 2:12 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville travel stop

Greetings
This is Ramesh Turen and I Own several businesses in town and the competition is already tuff. As exciting as it sounds to get new business in town I don't think it would work that way as it is going to attract some bad crowd in town. I also have businesses in Sacramento as well and there are truck stops near them too and I can tell from personal experiences that it has ruined the local community and businesses as it attracts a lot of criminals and encourages prostitution,theft and just within 1 mile there are also 10 gas stations and there are going to suffer severely because of it. We appreciate that the city is taking advice from locals and we strongly disagree with the idea
Thank you

I12-1

Letter I12 Individual

Ramesh Turen 1
January 30, 2026

I12-1 The comment opposes the project, citing increased competition and crime.

Please see Response to Comment I9-7 regarding potential impacts to public services including police and emergency services. The comment will be used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I13

From: Ramesh Turen <rturen72@gmail.com>
Sent: Friday, January 30, 2026 2:15 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel Stop

Susanville Travel stop
Greetings
This is Ram and As exciting as it sounds to get new business in town I don't think it would work that way as it is going to attract some bad crowd in town. I also have businesses in Sacramento as well and there are truck stops near them too and I can tell from personal experiences that it has ruined the local community and businesses as it attracts a lot of criminals and encourages prostitution,theft and just within 1 mile there are also 10 gas stations and there are going to suffer severely because of it. We appreciate that the city is taking advice from locals and we strongly disagree with the idea
Thank you

I13-1

Letter I13 Individual

Ramesh Turen (second response)
January 30, 2026

I13-1 The comment opposes the project, citing increased competition and crime.

Please see Response to Comment I9-7 regarding potential impacts to public services including police and emergency services. The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter
I14

To: Susanville City Manager Dan Newton dnewton@cityofsusanville.gov

Re: comments related to Travel Stop for Susanville California 1/30/26 Martin Balding

I went to the City office on 1/27/26 to see a copy of the EIR for the "Travel Stop". One copy of the document was there, consisting of at least one hundred pages, not to be taken from the room. A volume like that would take hours of study to get information for an informed opinion. I had to leave to be with my companion waiting in my car.

The City, at an absolute minimum, should have had a five or ten page synopsis of the EIR as a hand-out, so interested persons would have a chance of knowing what was being proposed. It appeared that an informed public was not wanted!

I14-1

MY COMMENTS:

This looks like a major project. Is it truly a "Travel Stop" or more correctly a Truck Stop? If it is a Travel Stop, needed for people going through our town, we can direct them to our gas stations, restaurants, fast foods, grocery stores, theaters, motels, swimming pool, shopping centers, Chamber of Commerce, museum, trails, lakes, streams, Susanville Ranch and other parks. We have it all and we should not be creating competition for our existing businesses. Susanville is THE Travel Stop, we don't need another. We already have it all!

Where is the money behind it, why is it needed, who paid for the EIR and is there a balance sheet showing expected income for the city/county, and the expected upfront, and continuing cost, for the city/county? Is that available information? It should be, please direct it to me if you can.

I14-2

My comments regarding a "Travel Stop" for trucks:

Off the top, a stop for trucks would be always be in operation, with noise, light, gas, air, fuel, water, traffic, fire, and policing controls needed all the time. I see upfront and ongoing costs for the city and county for extended services. Wastewater will need added treatment, and spills could be a disaster impacting ground water, wells, surface water and sewage treatment. Added air pollution is a given, with noisy engines idling at all times. Lights of course would be needed all night.

I14-3

Now if the above is not enough, just key in to the net: "Truck Stops, Drugs, Prostitution, and Human Trafficking". That alone is a decision maker for me. I will say no for a Travel Stop being planned for our wonderful town of Susanville here at the foot of the mountains, with real and wonderful sparsely developed nature around us. One of the best places to live in our country. Let's appreciate and improve what we already have.

I14-4

The Travel Stop proposal needs to be a single item agenda, discussed by the public at Jensen Hall, and it must be voted on by the residents of Lassen County, it is a major item, and if developed, it will come with unintended consequences for sure.

i14-5

Respectfully,

Martin Balding
470-245 Haven Lane
Susanville, CA 96130
mgbalding@gmail.com

Martin Balding
1/30/26

BEST WISHES DAN

Martin

Letter I14 Individual

Martin Balding
January 30, 2026

I14-1 The comment notes that the commenter appeared in person to review the Draft EIR at City Hall, and that it would take hours of study to get information for an informed opinion, thus a synopsis of the EIR should have been provided, contending the City was trying to avoid informing the public about the project.

The first 20 pages of the Draft EIR represent the Executive Summary (ES), providing a summary of the project, its objectives, environmental impacts and recommended mitigation measures. The ES is set out in a way so that an informed opinion of the project impacts can be determined without reading the entirety of the Draft EIR.

Pursuant to the provisions of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation (NOP) for a 30-day period, beginning on February 3, 2025 and ending on March 5, 2025, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. An advert was published online and for 4 consecutive weeks in the Modoc County Record on February 6, 13, 20 and February 27, 2025, further notifying the public about the project. A public scoping meeting was held on February 20, 2025 from 6:00pm to 7:00pm. The IS/NOP was posted to the SCH's CEQAnet website: https://ceqanet.lci.ca.gov/2025011078.

On December 17, 2025, the City released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (https://www.cityofsusanville.gov/326/Susanville-Travel-Stop-Draft-EIR) and its facebook.com page (https://www.facebook.com/cityofsusanville/posts/notice-of-availability-for-a-draft-environmental-impact-report-for-the-susanvill/1302880775212767); and was made available for review at the City of Susanville, City Hall, 66 N Lassen Street, Susanville, CA 96130. A Notice of Availability (NOA) of the Draft EIR was published in the Intermountain newspaper on December 17 and 24, 2025 and distributed by the City via email to the Lassen County LAFCO, Lassen County, and those commenters/interested parties who commented on the NOP.

The City therefore undertook satisfactory public consultation in accordance with CEQA Guidelines Section 15083, *Early Public Consultation*, CEQA Guidelines Section 15086, *Consultation Concerning Draft EIR* and CEQA Guidelines Section 15087, *Public Review Of Draft EIR*. The City also only needed to publish a public notice one-time, but published the NOP for 4 consecutive weeks and the NOA for 2 consecutive weeks, thus seeking meaningful engagement on the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I14-2 The comment questions the difference between the project being a travel stop or a truck stop, and notes the City should direct visitors to the existing services in town. The comment also questions the finances associated with the project and expected income and operating costs.

Please see Response to Comment I2-1 for details on the economic benefits to the City. The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I14-3 The comment notes that the project would require noise, light, gas, air, fuel, water, traffic, fire, and policing control, noting upfront costs for the City. The comment also notes wastewater will need added treatment, and spills could impact groundwater, wells, surface water and sewage treatment, and that air and light pollution could result.

In terms of noise and light pollution, see Responses to Comments I7-1 and I9-2. Please see Response to Comment I9-3 in regard to control of runoff. In terms of policing, please see Response to Comment I9-7. Please see Response to Comment I2-1 for details on the economic benefits to the City. As determined in the Initial Study undertaken in support of the project, (Appendix A of the Draft EIR), the typical water demand to

sewer demand ratio is 1.15:1, meaning that for every 115 gallons of water consumed, 100 gallons of wastewater would be generated. However, assuming all water used by the project (approximately 7,000 to 9,000 gpd or 7.8 to 10.1 AFY) resulted in an equal amount of wastewater generated, the additional 9,000 gpd would be well within the wastewater treatment plant's ability to treat and discharge the generated wastewater. Therefore, no impacts related to water supplies and wastewater treatment are expected.

I14-4 The comment opposes the project, citing increased competition and crime.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I14-5 The comment requests the project be a single item agenda, discussed by the public at City Hall, and asserts it must be voted on by the residents of Lassen County.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I15

From: Cindy Becker <cebeckerred@gmail.com>
Sent: Saturday, January 31, 2026 8:12 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Re: submit comments to Dan by tomorrow 5pm

Hello Dan,
My name is Cindy Becker and I am a resident of Susanville, residing at 220 North Roop St. I have these comments to share concerning the Susanville Travel Stop Draft EIR.

In the Lassen County Economic Development Plan (2012), amended in 2016, there was a call for a travel stop/visitors center under the heading entitled **Attracting Visitors Priority Action 2**. It stated:

"A Rest Stop & Visitor Center centrally located on Main Street, Susanville – The City of Susanville's Main Street (Uptown and Downtown) is an asset on a major thoroughfare (Highway 395). There is an estimated average annual daily traffic of 50,000.9 Rather than kiosks at either end of town, a center-city location will encourage people to explore Main Street, side streets, and businesses in town that are close walking distance now that they are out of the car. A kiosk could be part of the Visitor Center. To combat the 'drive-thru' syndrome and to get traffic to stop, create a Rest Stop and Visitor Center in mid-town. The goal is to create a safe haven for visitors to stop and explore. Travelers want to stop in safe places where there is ample parking for passenger cars and motorhomes, clean rest rooms, space to walk dogs, picnic tables and information on the area, local businesses, and events. Use the rest stop / kiosk as an opportunity to promote and market, offer walking maps to the businesses, trail maps, walking path to the Depot." I15-1

I am saddened that instead of this vision that would draw people into the city of Susanville, the city is opting instead to propose annexing land outside of the city limits to build an unsightly, out of scale truck stop that will not encourage people to come to our city but rather race through it to their next destination. I am in favor of accommodations for visitors and the trucking business but this proposed truck stop will do little to promote our city. Rather it will create light pollution, sound pollution, and harm our current businesses in town. The scale of the proposed project is out of line with the current and projected traffic through this area. There is no need for 70 (!) standard truck parking spaces and >50 vehicle spaces. There is no need for a 10 spot RV park when we have one already in the city. There is no need for a 75 foot lighted sign when roadside CALTRANS / DOT signs would suffice. The impact on our dark sky I15-2

of the proposed lighting will be significant and negative. The sound pollution of idling trucks - up to 70 - will have a significant and negative impact on the well-being of residents of south Susanville. I15-2 (cont)

I am not in favor of the truck stop location, proposed scale, and vision. It will encourage visitors to drive through and not stop in town. I am saddened by the lack of vision and the disregard of the work of community members that is documented in the City's own Economic Development Vision. I15-3

Thank you for letting me voice my opinion.

Cindy Becker

Letter I15 Individual

Cindy Becker
January 31, 2026

I15-1 The comment notes that in the Lassen County Economic Development Plan (2012), amended in 2016, there was a call for a travel stop/visitors center under the heading entitled Attracting Visitors Priority Action, and proceeds to quote from the plan.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment is an introduction and does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I15-2 The comment contends that the project does little to promote the city and will create light and noise pollution, and harm current businesses. The comment asserts that the scale of the project is out of line with the current and projected traffic through this area, and further queries the need for parking spaces, the RV Park aspect and the high-mast sign, reiterating lighting and noise impacts.

Regarding the Project's compatibility with the zoning and the annexation process, please see Response to Comment I9-1. In terms of noise and light pollution, see Responses to Comments I7-1 and I9-2. As discussed in Section 3.1 of the Draft EIR, Aesthetics, in accordance with Section 13531 and 13532 of the Business and Professions Code (BPC), the sale of any motor vehicle fuel to the public from any place of business shall display on the premises an advertising medium that complies with the requirements of the BPC and advertises the total prices of the three major grades of motor vehicle fuel offered for sale. This sign shall be clearly visible from the street or highway adjacent to the premises. When the place of business is situated at an intersection, the advertising medium shall be clearly visible from each street of the intersection. As such, the size of text and illumination of the high-rise side is a necessity associated with compliance with the BPC requirements. As explained within the Project Description section of the Draft EIR, due to the nature of the development (a truck stop serving large semi-trucks), it is imperative that adequate visibility is achieved at a safe distance which allows truck drivers to plan their maneuver and exit SR 36 to turn into the site. Information contained in USSC guidance notes that at 50 miles per hour, the rate at which the viewing distance decreases is 88 feet per second. Because of this rapidly decreasing window of viewing opportunity, roadside sign design, and its height, is critical to traffic safety. As such, the sign height is necessary to enable safe access to the project site and ensure sufficient braking distance for safety. Figure 3.1-7a and 3.1-7b of the Draft EIR shows the high-mast sign's indicative visibility from SR 36 northbound and southbound, noting it is substantially more difficult to see outside of 0.5-miles away. The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I15-3 The comment opposes the project's location, scale and vision and contends the City disregarded the Economic Development Vision.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I16

From: Amy Holmen <arholmen13@gmail.com>
Sent: Saturday, January 31, 2026 8:42 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Cc: Amy Holmen <arholmen13@gmail.com>
Subject: Susanville Travel Stop

Hello Mr. Newton,

I am writing with my comments on the Environmental Impact Report (EIR) for the proposed Susanville Travel Stop. Although I understand the potential value of this project as a source of tax revenue for the City of Susanville, I have some major concerns with the project as it is presented. My primary concern is that this project prioritizes the comfort and convenience of pass-through travelers at the expense of City and County residents due to the scale and design of this project, and will irreparably harm the small-town ambience and scenic character of our town. I have included additional concerns and a more detailed assessment of the EIR below. I16-1

Aesthetics- Project scale does not match community

The proposed "regional travel stop" is an inappropriate scale for a small, natural resource focused community. This project's size, infrastructure requirements, and included amenities (including extensive signage and lighting) would substantially alter the visual appeal of the gateway to Susanville and would distract from the existing rural and agricultural landscape. In my opinion, the EIR does not adequately support a finding of "less than significant" impact for the aesthetic issues cited, and I would request a re-evaluation of impacts 3.1-1 and 3.1-2. I16-2

Aesthetics- Signage and light pollution

The proposed high-intensity, tall entrance signage and extensive lighting would greatly change the nighttime ambience of the Susanville area. At the height and brightness described, the entrance sign could be visible for miles, and would destroy the quiet, rural experience that residents value. The included justification for this tall signage is not reasonable, since this would be the only center of this scale within nearly 100 miles in any direction, and there would be ample opportunity for small, less intrusive signage from all directions. I16-3

The EIR also understates the way that this new lighting and signage would degrade public views and scenic resources. It is critical, that if this project is allowed to proceed, that there should be strict, enforceable mitigation for these impacts, including options such as height and brightness limitations, fixture shielding, and other measures as deemed appropriate.

Air and Water Quality

The EIR does not fully address the air quality consequences of increasing the traffic and vehicles spending time in this spot. In particular, the effects of idling semi-trucks, and the associated idling, will produce localized emissions, and because the site is a low spot in the valley where air can settle, emissions could accumulate in this spot. The EIR should quantify the localized emissions expected from this volume of trucks and passenger vehicles, and these impacts should be evaluated, and mitigated. I16-4

Water quality and hydrology were not properly addressed, especially due to the close location to the Susan River, which has historically had water quality issues already. I do not believe that the included bioretention basins are sufficient to take into account all the possible factors that could affect water quality and hydrological impacts. I16-5

Recreation and active transportation connectivity

The location of this project on Skyline Rd is identified in the Lassen County Bikeway Master Plan (and other local and regional transportation plans) as a critical connector between the Bizz Johnson National Recreation Trail and the County of Lassen's Susanville Ranch Park and Lassen College. The City should require on- and off-site improvements to protect and enhance this corridor for recreational and commuter cyclists and pedestrians. At minimum, the project should fund and construct separated bike lanes on the project frontage and safe crossing treatments. I16-6

Inadequate consideration of reasonable alternatives

The proposed alternatives examined in the EIR are not sufficient to provide a thorough assessment of the impacts of this project. There should be additional, feasible alternatives that address local needs and reduce community impacts. This is a failing of this EIR to provide the community with smaller scale and locally-appropriate alternatives. Two specific alternatives that deserve a full analysis are: I16-7

- A combined "No drive-thru, no overnight RV park" alternative (combining alternatives 2 & 3), since similar services already exist in the City of Susanville, and;
- A reduced scale alternative that significantly limits the number of overnight truck parking stalls, and reduces overall amenities to reduce lighting, air quality, and visual impacts to better match with community aesthetics.

Conclusion

Susanville's rural character, agricultural and natural landscapes, and recreational networks are assets that deserve careful protection. The EIR as presented overlooks or understates significant impacts and does not sufficiently explore small-scale alternatives. I would request that the EIR be revised to address the issues I have listed, and that the City of Susanville consider project redesign and mitigation measures to protect our residents' health, quality of life, and the character of our community over the convenience of pass-through visitors. I16-8

Thank you for your consideration of my comments.

Sincerely,

Amy Holmen

City of Susanville Resident

--
Amy Holmen

Letter I16 Individual

Amy Holmen
January 31, 2026

I16-1 The comment is introductory in nature, and acknowledges the potential value of this project as a source of tax revenue; however, the comment also expresses concern that the project prioritizes the comfort and convenience of pass-through travelers at the expense of City and County residents due to the scale and design of this project, and contends irreparable harm to the small-town ambience and scenic character of the city.

The comment introduces the comments to come, please see responses below. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I16-2 The comment states the project is an inappropriate scale for its location and contends the project would substantially alter the visual appeal of the gateway to Susanville and would detract from the existing rural and agricultural landscape. The commenter opines that the EIR does not adequately support a finding of "less than significant" impact for the aesthetic issues cited and requests a re-evaluation of impacts 3.1-1 and 3.1-2 of the Draft EIR.

Section 3.1 of the Draft EIR, Aesthetics, assessed the potential impacts associated with the project and determined less-than-significant impacts with implementation of the project. Please see Response to Comment I7-1 with regard to the photometrics plan undertaken by the project in terms of lighting impacts. Please see Response to Comment I15-2 in terms of signage information required by law and the safety reasons as to why the sign's heigh is proposed to be so tall. To the extent the commenter contends the Project is incompatible with the community character, CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.' In terms of a re-evaluation of impacts, CEQA Guidelines Section 15064, subdivision (f)(4) states that "the existence of public controversy over the environment effects of a project will not require preparation of an EIR…." Relatedly, subdivision (f)(5) clarifies that "Argument, speculation, unsubstantiated opinion or narrative … shall not constitute substantial evidence."

As such, an unsubstantiated disagreement regarding the correctness of conclusions drawn from the impact analysis undertaken does not necessitate a re-evaluation. In terms of the EIR summarizing the main point of disagreement, the commenter does not provide evidence as to why impacts 3.1-1 and 3.1-2 of the Draft EIR need re-evaluation other than the commenter's opinion regarding the size (scale) of the Project. In terms of the scale, as outlined in Section 3.1 of the Draft EIR, in accordance with City of Susanville Code of Ordinances, Section 17.36.050 Site Development Standards, the maximum permitted structural height in the C-2 district which the project would become part of upon annexation, is 40 feet and the single-story building housing the fast-food restaurant and convenience store would be substantially below this at approximately 25 feet. The prefabricated construction company buildings and lumber yard are of larger scale than the project, thus, the project would be of no greater scale than other existing commercial development in the vicinity of the project site. Furthermore, the Draft EIR and supporting documentation contained therein provides substantial evidence that a less than significant impact would occur, in accordance with CEQA Guidelines Section 15384. As such, no changes to the Draft EIR are proposed and no further response is required.

I16-3 The comment contends the proposed high-intensity, tall entrance signage and extensive lighting would greatly change the nighttime ambience of the Susanville area and notes that at the height and brightness described, the entrance sign could be visible for miles, and would destroy the quiet, rural experience that residents value. The comment states the justification for the signage is unreasonable. The comment contends the EIR also understates the way that this new lighting and signage would degrade public views and scenic resources. The comment notes there should be strict, enforceable mitigation for these impacts, including options such as height and brightness limitations, fixture shielding, and other measures as deemed appropriate.

Please see comment I16-2 regarding disagreements with the Draft EIR's environmental conclusions, Response to Comment I15-2 in terms of signage information required by law and safety requirements, and Response to Comment I7-1 with regard to lighting. As noted within Section 3.1 of the Draft EIR, the scenic resources identified in the Lassen County General Plan Natural Resources Element are those within Scenic Highway Corridors. Although the project site and the offsite utilities are near to the potential scenic highway and would be visible from the potential scenic highway, they are outside the boundary as depicted on Figure 3.1-6. The General Plan notes that development is not precluded from occurring within the scenic corridor and, in planned locations, motels, restaurants and certain other commercial services are considered appropriate provided the intensity and location of development does not impair natural scenic qualities and that the design of all development is in character with the natural surroundings. Here, the project is not located within any scenic corridor identified in the Lassen County General Plan or the Susanville Vicinity Area Plan. Therefore, the travel stop is consistent with the intent of the General Plan. Thus, it can reasonably be argued that the project would not degrade scenic resources, when development is allowed and existing development of greater scale exists in adjacent parcels. In terms of mitigation, per CEQA Guidelines Section 15126.4(a)(3) "Mitigation measures are not required for effects which are not found to be significant" thus, because no significant impacts were identified related to Aesthetics, no mitigation is required. For the extents and purposes of this Draft EIR, the project design features related to light and glare (PDF-AES-1) would be enforceable by the City through the Mitigation Monitoring and Reporting Program (MMRP) undertaken for the project. Additionally, to the extent the commenter contends the proposed lighting and signage is incompatible with the community character, CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.' No changes to the Draft EIR are proposed and no further response is required.

I16-4 The comment contends that the Draft EIR does not fully address the air quality consequences of the project, noting the effects of idling semi-trucks will produce localized emissions. The comment requests that the Draft EIR should quantify the localized emissions expected from this volume of trucks and passenger vehicles, and these impacts should be evaluated, and mitigated.

See Response to Comment I4-1 regarding applicable restrictions on truck idling. Per Section 3.2 of the Draft EIR, Air Quality, regional and local criteria air pollutant emissions and associated impacts, as well as impacts from toxic air contaminants (TACs), carbon monoxide (CO) concentrations, and odors were assessed using industry standard and accepted software tools, techniques, and emission factors. The project's construction and operational emissions are compared to relevant thresholds from Lassen County Air Pollution Control District (LCAPCD). Operational emissions of criteria air pollutants and precursors were estimated using project-specific information, where available, including geographic information and the project's location, default values in the California Emissions Estimator Model (CalEEMod) based on the project's location and land use, and mobile source emission rates from CARB's Emission Factor (EMFAC) model. Mobile-source emissions were modeled outside of CalEEMod using trip generation and trip length data from the transportation analysis, as summarized in Table 3.2-4 of the Draft EIR. Indirect emissions associated with the use of consumer products and landscape maintenance activities were estimated using the applicable modules of CalEEMod using default consumption values. The level of health risk from exposure to construction- and operation-related TAC was assessed quantitively and CO emissions was assessed qualitatively. This assessment was based on the proximity of TAC-generating activity to offsite sensitive receptors, the number and types of diesel-powered construction equipment being used, the duration of potential TAC exposure, and set back distances recommended by CARB, and the minor trip generation associated with project operation. The commenter is referred to Table 3.2-6 of the Draft EIR which summarizes the daily operational-related emissions of criteria air pollutants and ozone precursors at full buildout. Appendix C of the Draft EIR outlines the quantitative modelling that was used to assess air quality impacts. Please also see Response to Comment I5-2 for details regarding CARB's anti-idling requirements and state law. In terms of mitigation, as mentioned previously, per CEQA Guidelines Section 15126.4(a)(3) "Mitigation measures are not required for effects which are not found to be significant" thus, because no significant impacts were identified related to Air Quality, no mitigation is required. See also Response to

Comment I16-2 regarding disagreements with the Draft EIR's environmental impact conclusions. No changes to the Draft EIR are proposed and no further response is required.

I16-5 The comment claims that water quality and hydrology were not properly addressed, noting proximity to the Susan River. The commenter asserts that the included bioretention basins are insufficient to take into account all the possible factors that could affect water quality and hydrological impacts.

See Response to Comment A2-5 regarding the scope of project construction activities near the Susan River. CEQA Guidelines Section 15128 allows an EIR to briefly describe the reasons why some environmental effects were determined not to be significant and then to dismiss these effects from detailed review in the EIR. As Hydrology and Water Quality was previously assessed in the Initial Study undertaken in support of the Draft EIR as having a less-than-significant impact in all CEQA thresholds, the EIR "scoped-out" the topic for full analysis, see Appendix A of the Draft EIR for details. However, as outlined in Section 3 of the Draft EIR, Effects Found Not To Be Significant, a summary of the findings from the Initial Study was provided and the Initial Study itself was included as Appendix A to the Draft EIR. Please see Response to Comment I9-3 for details on the SWPPP that would be required as part of the project which would also reduce pollutants in stormwater runoff from the project site. See also Response to Comment I16-2 regarding disagreements with the Draft EIR's environmental impact conclusions. No changes to the Draft EIR are proposed and no further response is required.

I16-6 The comment notes the location of the project site is identified in the Lassen County Bikeway Master Plan (and other local and regional transportation plans) as a critical connector between the Bizz Johnson National Recreation Trail and the County of Lassen's Susanville Ranch Park and Lassen College. The comment asserts the City should require on- and off-site improvements to protect and enhance this corridor for recreational and commuter cyclists and pedestrians, and that the project should fund and construct separated bike lanes on the project frontage and safe crossing treatments.

Please see comment I1-2 regarding the project site plans showing the dedication of a 23-foot right-of-way along the southern project site frontage to accommodate the future implementation of the Class I facility extension. Please also see Response to Comment A3-11, regarding bicyclist and pedestrian safety, noting that refined design drawings will be provided during the encroachment permitting phase. The comment is noted and will be considered by project decisionmakers. As this comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I16-7 The comment contends that the proposed alternatives examined in the EIR are not sufficient to provide a thorough assessment of the impacts of the project, and that there should be additional alternatives that address local needs and reduce community impacts. The comment claims that the Draft EIR fails to provide the community with smaller scale and locally-appropriate alternatives, and suggests two alternatives for analysis.

See Response to Comment I16-2 regarding disagreement with the EIR's environmental impact conclusions. Additionally, to the extent the commenter contends the proposed project is incompatible with the community character, CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.' Per CEQA Guidelines Section 15126.6:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."*

Thus, although the commenter notes additional alternatives, the alternatives selected for analysis were chosen in consideration of CEQA Guidelines Section 15126.6(c), that "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project." Because community character is a social issue, not an environmental one, the EIR does not need to consider alternatives designed to reduce community impacts. Note that the City considered, but rejected, a No Short-Term or Overnight Truck Parking alternative due to it not meeting one or more of the basic objectives of the proposed project. In addition, per CEQA Guidelines Section 15126.6(f), "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Thus, the analysis of alternatives was undertaken in accordance with CEQA Guidelines Section 15126.6, and need not consider every conceivable alternative to a project. Additionally, the Alternatives proposed by the commenter are not considerably different than the Alternatives analyzed in the Draft EIR and would not clearly lessen the substantial environmental impacts of the project. No changes to the Draft EIR are proposed and no further response is required.

I16-8 The comment concludes by saying that the Draft EIR overlooks or understates significant impacts and does not sufficiently explore small-scale alternatives, requesting revision of the Draft EIR to address the comments listed and to consider project redesign and mitigation measures to protect residents' health, quality of life, and the character of the community.

As noted throughout the Draft EIR, there were no significant impacts identified that could not be reduced to less-than-significant levels through mitigation, and the commenter generally does not provide evidence that there would new or substantially more severe impacts in the comments above, but merely asserts there would be impacts that weren't addressed. There is, however, substantial evidence in the record to support the assessments undertaken in the Draft EIR, which include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts, in line with CEQA Guidelines Section 15384. None of the conditions outlined in CEQA Guidelines Section 15088.5 have been met requiring recirculation, and none of the comments raised constitute significant new information added to the EIR. No changes to the Draft EIR are proposed and no further response is required.

Letter I17

From: Steve Hawks <chukarg@gmail.com>
Sent: Saturday, January 31, 2026 8:51 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Susanville Travel Stop EIR comments

This is a horrible idea. I17-1

1. Building and paving development shouldn't take place in the valley bottom where agricultural land is lost (up on the dry, rocky hillside by the college is a better place for development), and where water displacement will cause more flooding. This is basically a wet-land area along the river, or used to be, and will be again during wet winters. I17-2

2. Constant noise and pollution will be significant, leaked oil and fuel, along with copious amounts of discarded junk-food wrappers, piss bottles and other trash. A truck stop will provide even more opportunity for homeless camping/foraging. I17-3

3. It will draw the wrong kinds of visitors. Prostitution and sex trafficking will increase. I17-4

4. There really isn't a need. A truck stop will draw customers away from other business, putting them at risk of failure, and profits won't stay in or benefit the area. The problems will. I17-5

5. It will be an ugly introduction to the town, making it look like any number of shitholes in Nevada. I17-6

Please do not turn our town into a toilet!

Steve Hawks
704-845 Indians Rd.
Janesville, CA 96130
(530)310-0350

Letter I17 Individual

Steve Hawks
January 31, 2026

I17-1 The comment opposes the project.

The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I17-2 The comment notes that building and paving development shouldn't take place in the valley bottom where agricultural land is lost and where water displacement will cause more flooding.

Please see I9-3 for details on the SWPPP that would be required as part of the project which would ensure surface water runoff is adequately considered. Also, please review the Draft EIR, Section 2, with regard to the project's bioretention basins that will capture runoff to ensure there would not be localized flooding. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I17-3 The comment contends there will be constant noise, and pollution, including trash and impacts will be significant. The comment notes that there will be greater opportunity for people experiencing homelessness to have foraging opportunities.

Please see Response to Comment I9-2 regarding noise and Response to Comment I9-3 regarding potential spills. Per CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment, thus the consideration of people experiencing homelessness is outside the scope of the CEQA assessment. However, the tax revenue generated by the project would help fund existing and future law enforcement, emergency and social services, and infrastructure needs, which could be used to support neighbors in need. In addition, the project will comply with City and County policies, especially Susanville General Plan Policy b: The City shall attempt to reduce the generation of trash and will encourage private enterprise to do the same. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I17-4 The comment opposes the project, citing increased crime.

Please see Response to Comment 19-7 regarding potential impacts to public services including police and emergency services. The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I17-5 The comment questions the need for the project, noting that the truck stop will draw customers away from other business, putting them at risk of failure, and profits won't stay in or benefit the area.

As outlined in the project's transportation analysis, the vast majority of trips to the project site will be pass-by trips. In addition, please see Response to Comment I2-1 with regard to tax revenues that will be kept by the City. In addition, per CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment. The comment will be considered and used to inform the City's decision regarding whether to approve the project, however, as the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

I17-6 The comment contends that the project could have an aesthetic impact.

Please see Section 3.1 of the Draft EIR, Aesthetics, for a full analysis of the aesthetic impact of the project, which determined a less-than-significant impact with project construction and operation. Additionally, to the extent the commenter contends the proposed project is incompatible with the community character, CEQA Guidelines Section 15064 (e) states that 'Economic and social changes resulting from a project shall not be treated as significant effects on the environment.' As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I18

From: becka2b@aol.com <becka2b@aol.com>
Sent: Saturday, January 31, 2026 11:30 AM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: New project

Susanville is in need of something new! Job opportunities and people stopping instead of just driving through . I'm in favor of this project . I18-1

Sent from the all new AOL app for iOS

Letter I18 Individual

Unnamed Individual – becka2b@aol.com
January 31, 2026

I18-1 The comment is supportive of the project, noting it will be beneficial to the community. The comment will be considered and used to inform the City's decision regarding whether to approve the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

Letter I19

From: marym97415 <marym97415@yahoo.com>
Sent: Saturday, January 31, 2026 2:10 PM
To: Dan Newton <dnewton@cityofsusanville.gov>
Subject: Truck stop

Dear Mr. Newton,
I think the truck stop is a great idea and I hope it goes forward. It would be a great place to stop when there are high wind warnings for high profile vehicles on 395. Truckers need a truck stop in this area before they travel west to I-5 or or south to Reno. I hope this is approved! Sincerely, Mary Manning Westwood, CA

I19-1

Sent from my U.S.Cellular© Smartphone

Letter I19 Individual

Mary Manning
January 31, 2026

I19-1 The comment is supportive of the project, noting it will be beneficial to drivers of high-profile vehicles during high wind warnings, giving them a safe place to stop. The comment will be considered and used to inform the City's decision regarding whether to approve the project. As the comment does not raise an environmental issue regarding the adequacy of the Draft EIR, no further response is required.

3 REVISIONS TO THE DRAFT EIR

This chapter presents changes made to the Draft EIR since its publication and public review. CEQA requires recirculation of an EIR when the lead agency adds "significant new information" to an EIR after public notice is given of the availability of a draft EIR for public review under CEQA Guidelines Section 15087, but before EIR certification (CEQA Guidelines Section 15088.5[a]). Recirculation is not required unless the EIR is changed in a way that would deprive the public of the opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. Examples of significant new information include (i) a new significant impact for which no feasible mitigation is available to fully mitigate the impact (thus resulting in a significant and unavoidable impact), (ii) a substantial increase in the severity of a disclosed environmental impact, (iii) development of a new feasible alternative or mitigation measures that are considerably different from others previously analyzed and would clearly lessen environmental impacts but that the project proponent declines to adopt, and (iv) information indicating that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (CEQA Guidelines Section 15088.5[a]). Recirculation is not required when the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (CEQA Guidelines Section 15088.5[b]).

No changes to the project description or the environmental setting have occurred subsequent to the release of the Draft EIR for public review. However, a number of edits to mitigation measures and to the TIA have been undertaken following comment letters from CDFW and Caltrans. As discussed further in Section 3.1 below, the changes proposed are to Section 3.3 of the Draft EIR, Biological Resources, and Appendix I in the Draft EIR. Recirculation of the Draft EIR is not required as the information below does not constitute significant new information, but merely clarifies or amplifies or makes insignificant modifications in an adequate EIR, in accordance with CEQA Guidelines Section 15088.5[b].

3.1 REVISION TO MITIGATION MEASURE 3.3-2A

Mitigation Measure 3.3-2a, will be revised as follows:

> Mitigation Measure 3.3-2b: Conduct Focused Surveys for Other Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers
>
> - To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., vegetation clearing, ground disturbance, staging) should be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist). If project activities are conducted during the nonbreeding season, no further mitigation would be required.
> - Within ~~14~~ 7 days before the onset of any project activities to be implemented during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with the birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native bird nests. Surveys shall be conducted in accessible areas within 0.25 mile of the project site for bald eagles, golden eagles, and Swainson's hawks, within 500 feet of the project site for other raptor species and special-status birds, and within 50 feet of the project site for non-raptor common native bird nests.
> - If no active nests are found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant, CDFW, and the City of Susanville, and no further mitigation would be required.
> - If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers, in consultation with CDFW, around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically would be 0.25 miles for bald eagle and golden eagle,

and 500 feet for other raptors and special-status birds (e.g., bank swallow). Buffer size for non-raptor common bird species would be determined by a qualified biologist. Factors to be considered for determining buffer size would include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. Generally, buffer size for common bird nests would be at least 20 feet. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for individuals of a species listed as endangered or threatened under the Endangered Species Act or the California Endangered Species Act or that is a candidate for listing under the California Endangered Species Act would require consultation with CDFW and/or USFWS, depending on the species' legal status. Periodic monitoring of the nest by a qualified biologist during project activities would be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

- Removal of bald eagle and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald eagle or golden eagle nests are found during focused surveys, then the nest would not be removed.

3.2 REVISION TO MITIGATION MEASURE 3.3-2B

Mitigation Measure 3.3-2b will be revised as follows:

Mitigation Measure 3.3-2b: Conduct ~~Focused~~ Protocol Level Western Bumble Bee Surveys and Establish Protective Buffers

- ~~Within 14 days before commencement of project activities, a qualified wildlife biologist with familiarity with western bumble bee and experience using survey methods for the species shall conduct focused surveys of habitat suitable for the species within the project site.~~
- A qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a habitat assessment and focused survey (if the habitat assessment indicates that a survey is necessary) for western bumble bee following the methods in *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023) before the start of any ground-disturbing activities. Surveys shall be performed when western bumble bee is most likely to be identified, typically from April through September (i.e., the colony active period) when floral resources and ideal weather conditions are present.
  - Non-Invasive Surveys: non-invasive focused surveys would include the use of cameras to photograph bumble bees. Photographs would be reviewed and verified by a qualified individual to identify the bumble bees to species. Permits are not required for non-invasive surveys.
  - Non-Lethal Capture Surveys: surveys that would include capturing bumble bees for identification purposes and subsequently releasing the bees, would require a Memorandum of Understanding (MOU) from CDFW. No capture surveys will be conducted before the surveyor obtains an MOU. Prior to conducting non-lethal capture surveys, the applicant will provide the surveyor's qualifications and survey methodology to CDFW for review and approval.
- For any non-lethal capture surveys, the project applicant will submit a survey report to CDFW within 1 month of survey completion and will notify CDFW within 24 hours if western bumble bees are detected.
- If ~~no western bumble bee is found,~~ western bumble bees are not detected during focused surveys, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation will be required.

- If ~~western bumble bee is found,~~ western bumble bees are detected during the focused survey, appropriate avoidance measures will be implemented.~~, impacts to western bumble bee shall be avoided by establishing exclusion zones around occupied nests and floral resources within 100 meters of nests during the breeding/flight season of April–August.~~ Avoidance measures may include, but are not limited to, the following:
  - Protective buffers will be implemented around active nesting colonies until these sites are no longer active as determined by a qualified biologist. A qualified biologist, in consultation with CDFW, will determine the appropriate buffer size to protect nesting colonies; however, buffers will typically be at least 50 feet.
- If impacts on western bumble bee cannot be avoided, compliance with CESA and consultation with CDFW is required and may involve acquiring an incidental take permit (ITP) from CDFW. The project applicant will implement all avoidance measures included in the ITP.

3.3 REVISION TO MITIGATION MEASURE 3.3-3

Mitigation Measure 3.3-3, bullet point 1 will be revised as follows:

> **Mitigation Measure 3.3-3: Delineate Sensitive Natural Communities, Implement Avoidance Buffers, and If Needed, Compensate for Unavoidable Losses**
>
> - Prior to implementation of project activities on the banks of the Susan River or the distributary stream, a qualified biologist shall demarcate the extent of riparian habitat present on the banks and establish a no-disturbance buffer outside the dripline of the riparian vegetation using flagging ~~or high-visibility construction fencing~~ and identifying boundaries clearly in the construction drawings and contractor work plans. No vegetation removal or ground disturbing activities will occur within this buffer.

3.4 REVISION TO APPENDIX I - TIA, PAGE 36

Following Caltrans comment letter, the text under Alternative 2 on Page 36 will be revised as follows:

> ~~Caltrans has not expressed a preference of one geometric/signal phasing alternative over the other. But how the adjacent signal intersections along SR 36 near the study intersection operate may be an indication.~~
>
> ~~The SR 36/Riverside Drive intersection operates with split phasing on the side-streets despite protected left-turns being provided. The same is true for the SR 36/US 395/Richmond Road intersection to the south.~~
>
> ~~Despite what could appear to be Caltrans' preference for Alternative 1,~~ In their January 28, 2026 comment letter on the DEIR, Caltrans expressed a preference for Alternative 2. For documentation purposes, both alternatives are analyzed here in an equal level of detail.

3.5 REVISION TO APPENDIX I - TIA, APPENDIX B

Following Caltrans comment letter, the TIA has been amended to include the Final Technical Paper: Love's Trip Generation and Travel Characteristic Study, (GHD, 2018) within Appendix B, as requested. See Appendix I of this Final EIR for the study.

3.6 REVISION TO APPENDIX I - TIA, PAGE 47

Following Caltrans comment letter, Page 47 of the TIA has been amended to relabel the intersections. Page 47 has thus been amended as follows:

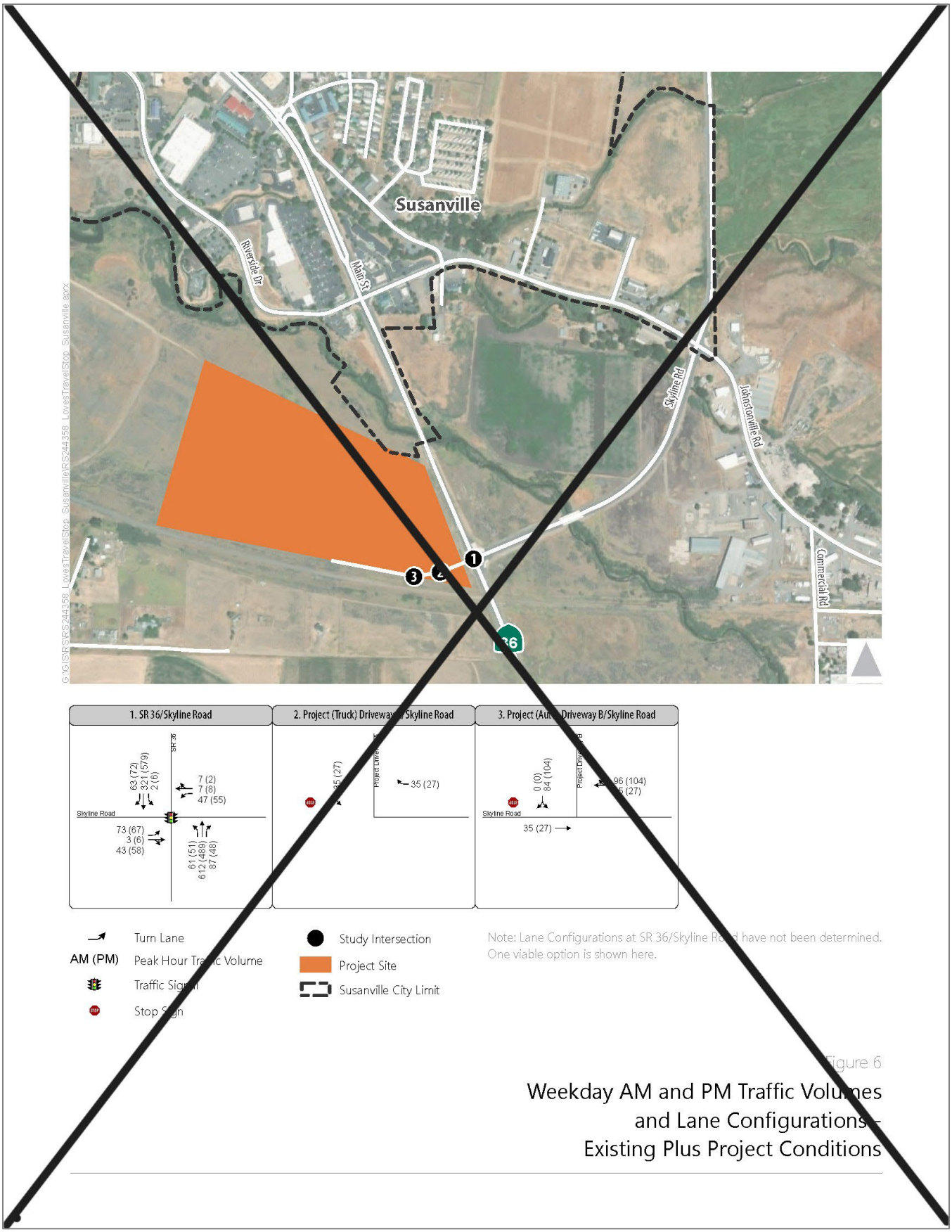
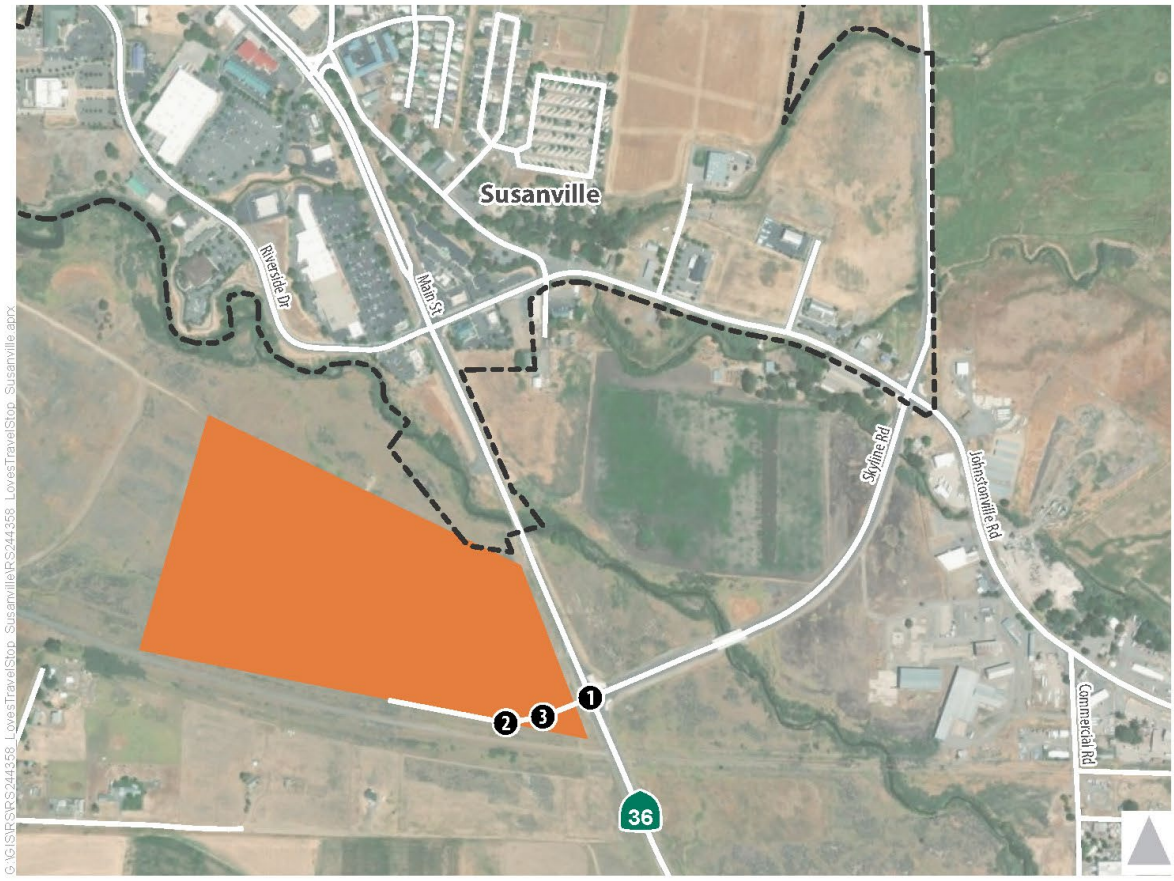


Figure 6

Weekday AM and PM Traffic Volumes and Lane Configurations – Existing Plus Project Conditions





Turn Lane
AM (PM) Peak Hour Traffic Volume
Traffic Signal
Stop Sign
Study Intersection
Project Site
Susanville City Limit

Note: Lane Configurations at SR 36/Skyline Road have not been determined. One viable option is shown here.

Figure 6

Weekday AM and PM Traffic Volumes and Lane Configurations - Existing Plus Project Conditions

3.7 REVISION TO APPENDIX I - TIA, APPENDIX A

Following Caltrans comment letter, the TIA has been amended to include traffic counts. See Appendix I of this Final EIR for the data.

4 REFERENCES

California Department of Fish and Wildlife. 2000. Life history account for Western Pond Turtle. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2657. Accessed January 28, 2026.

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California Department of Tax and Fee Administration. 2026. Tax Guide for Gas Station Operators. Available: https://cdtfa.ca.gov/industry/gas-station-operators/industry-topics.htm. Accessed January 28, 2026.

Caltrans. *See* California Department of Transportation.

CDFW. *See* California Department of Fish and Wildlife.

California Department of Transportation. 2022. Project Development Procedures Manual, Chapter 17 – Encroachments and Utilities. Available: https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf. Accessed February 26, 2026.

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Appendix I

Final TIA

Final

CEQA Transportation Impact Analysis Report for Love's Travel Stop in Susanville, CA

Prepared for:

Ascent Environmental

Updated:
February 2026

RS24-4358

FEHR PEERS

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1. INTRODUCTION

This chapter describes this report's purpose, provides a brief overview of the proposed project, lists applicable transportation-related policies that pertain to the proposed project under the California Environmental Quality Act (CEQA), and summarizes the transportation-related comments made by organizations and agencies on the Notice of Preparation (NOP) for this Environmental Impact Report (EIR).

Report Purpose

This CEQA Transportation Impact Analysis Report will serve as an appendix to the project's EIR. It focuses on the project's impacts to the transportation system based on its vehicle miles traveled (VMT). It also evaluates impacts to bicycle/pedestrian facilities, transit facilities and services, and roadway safety-related impacts including queuing and nonstandard design features.

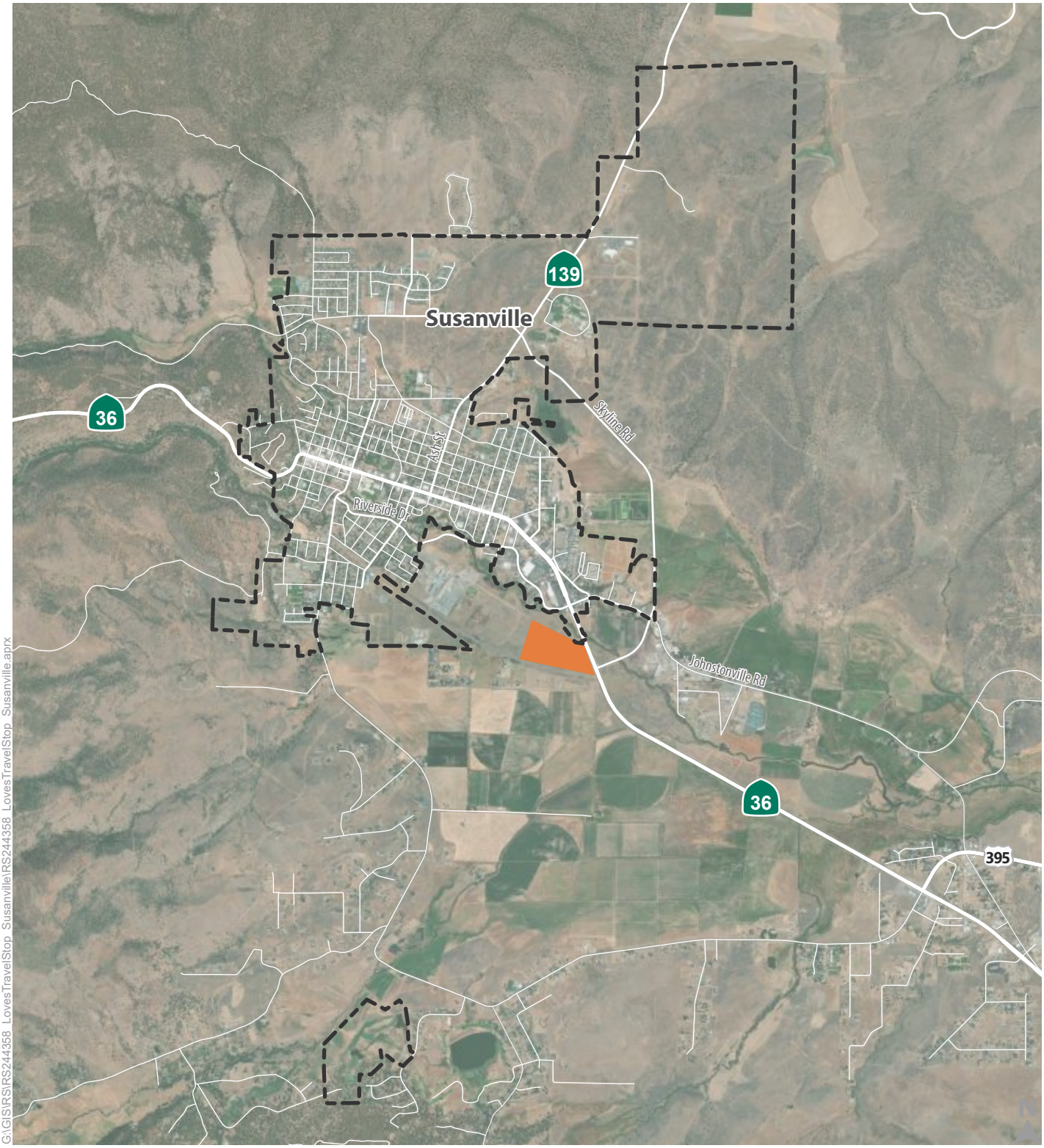
Project Location and Overview

The Love's Travel Stop in Susanville, CA ("proposed project") would be situated on a vacant parcel located directly west of State Route (SR) 36 opposite Skyline Road in Lassen County. If approved, the project site would be annexed into the City of Susanville, whose current southern City limits abut much of the northern edge of the project site. **Figure 1** shows the project location.

Figure 2 shows the project site plan (*Travel Stop Site Plan*, Lane Engineers, 2024). Its trip generating land uses include the following:

- 4 truck fueling lanes/positions and 70 truck parking spaces
- 12 vehicle (auto) fueling pump positions
- 7,943 sq. ft. convenience store
- 3,474 sq. ft. fast-food restaurant with drive-through window
- 1,588 sq. ft. fast-food restaurant without drive-through window
- 10 overnight RV parking spaces

The proposed project would be accessed exclusively by a fourth (west) leg to the SR 36/Skyline Road signalized intersection. Turn lanes would be added on SR 36 to accommodate movements into and out of this new leg. More details regarding project access are provided in Chapter 3.

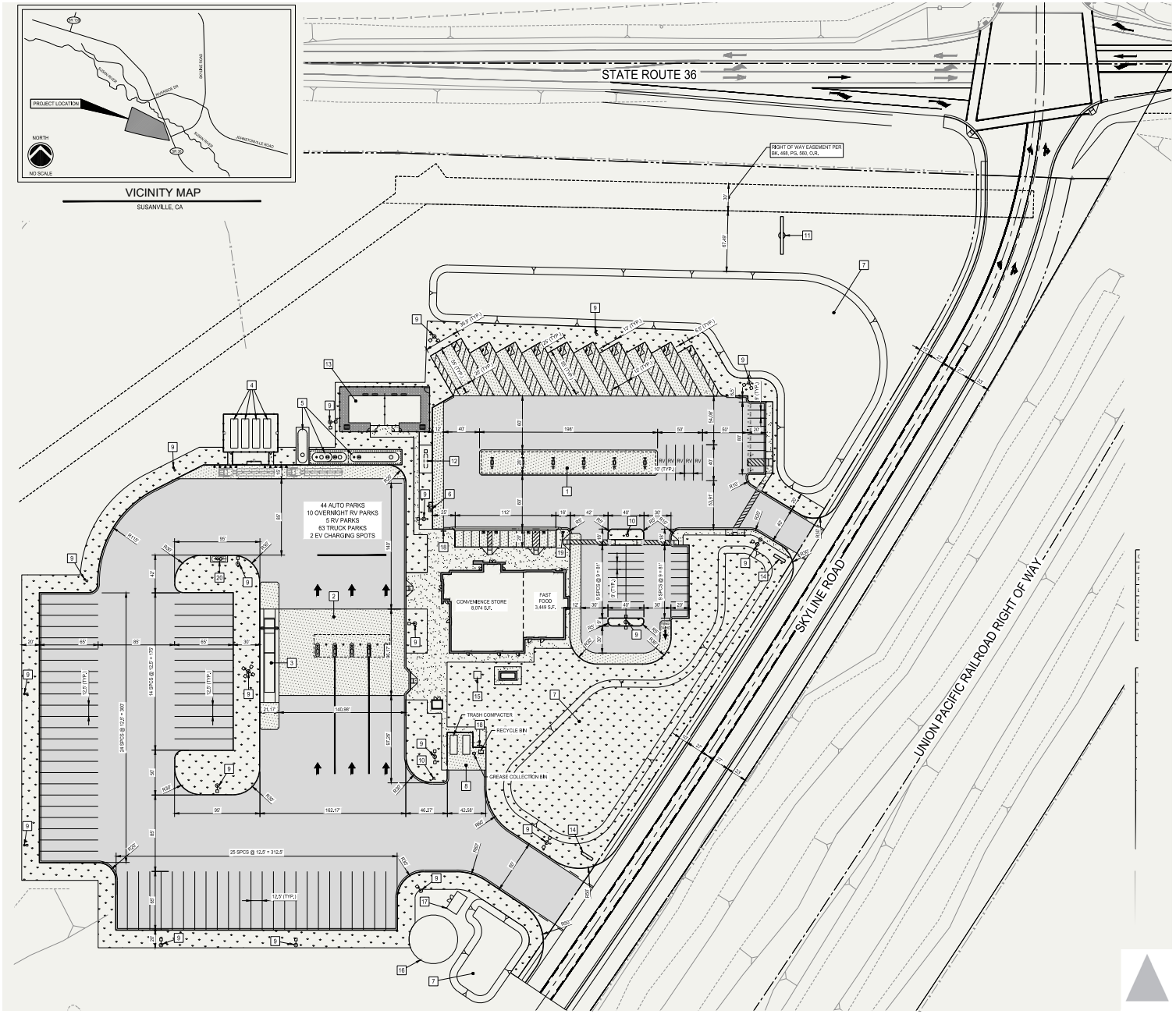


Project Site

Susanville City Limit

Figure 1

Project Location



N:\2024 Projects\4358.01_Loves_Susanville_FEIR\Graphics\AI\Fig02_SitePlan.ai

Figure 2

Site Plan

Applicable Transportation-Related Policies

This section presents federal, state, regional, and local regulatory requirements applicable to the project.

Pursuant to Senate Bill (SB) 743, Public Resources Code (PRC) Section 21099, and California Code of Regulations (CCR), Title 14, Section 15064.3, generally, VMT has replaced congestion as the metric for determining transportation impacts under CEQA. Section 15064.3 of the CEQA Guidelines provides that VMT is the "most appropriate measure of transportation impacts" and mandates analysis of VMT impacts effective July 1, 2020. A project's effect on automobile delay is no longer a consideration when identifying a significant impact; therefore, the impact of the project on delay-based traffic operations is not addressed in this EIR.

FEDERAL

Depending on the types of off-site improvements needed, policies of the Federal Highway Administration (FHWA) and other federal agencies may be applicable.

Surface Transportation Assistance Act (STAA)

The STAA of 1982 allows large trucks to operate on the Interstate and certain primary routes called collectively the National Network. These trucks, referred to as STAA trucks, are longer than California legal trucks. As a result, STAA trucks have a larger turning radius than most local roads can accommodate. On surface streets, STAA routes are designated either as Terminal or Service Access routes. Terminal routes are approved by the agency with jurisdiction over the roadway to enable the truck to reach its ultimate destination. Service Access routes allow STAA trucks to exit the interstate onto a local road for up to one mile to access food, fuel, lodging, or repairs.

Federal Motor Carrier Safety Administration (FMCSA)

The FMCSA has policies that relate to the hours of service for truck drivers. While not directly applicable to the entitlement review process per se, those policies indirectly influence the project's travel behavior. Specifically, the following regulations apply to truck drivers transporting property:

- They may drive a maximum of 11 hours after 10 consecutive hours off duty.
- They may not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Off-duty time does not extend the 14-hour period.
- They must take a 30-minute break when they have driven for a period of 8 cumulative hours without at least a 30-minute interruption. The break may be satisfied by any non-driving period of 30

consecutive minutes (i.e., on-duty not driving, off-duty, sleeper berth, or any combination of these taken consecutively).

- They may not drive after 60/70 hours on duty within 7/8 consecutive days. A driver may restart a 7/8 consecutive day period after taking 34 or more consecutive hours off duty.

Key takeaways from these somewhat complicated rules are that truck drivers must take breaks after driving a certain number of consecutive hours. This applies to trucks on SR 36 in the project vicinity, where there are no large truck stops for some distance from the project site.

STATE

The State of California has enacted several pieces of legislation that outline the state's commitment to encourage land use and transportation planning decisions and investments that reduce VMT and contribute to reductions in greenhouse gas (GHG) emissions in line with state climate goals. Other recent state policies pertain to roadway safety.

Senate Bill 743

SB 743, passed in 2013, required the California Governor's Office of Planning and Research (OPR) (now called the Governor's Office of Land Use and Climate Innovation [LCI]) to develop new guidelines that address transportation metrics under CEQA. Enacted as part of SB 743 (2013), PRC section 21099, subdivision (b)(1), directed the OPR to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, [OPR] shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Subdivision (c)(1) of PRC section 21099 gave OPR additional authority to "adopt guidelines pursuant to Section 21083 establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas." In other words, the new rules could apply either just to transit priority areas or could extend beyond them as well.

Subdivision (b)(2) of PRC section 21099 further provides that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to [CEQA], except in locations specifically identified in the guidelines, if any."

OPR published its proposal for the comprehensive updates to the CEQA Guidelines in November 2017, which included proposed updates related to analyzing transportation impacts pursuant to SB 743. The new rules governed the entire State of California, and not just transit priority areas. The updated CEQA Guidelines were adopted on December 28, 2018; and according to the new CEQA Guidelines Section 15064.3, VMT replaced congestion as the metric for determining transportation impacts. The guidelines state that "lead agencies may elect to be governed by these provisions of this section immediately. Beginning July 1, 2020, the provisions of this section shall apply statewide."

OPR published the *Technical Advisory on Evaluating Transportation Impacts in CEQA* ("*Technical Advisory*") in December 2018 to provide guidance to agencies implementing the new CEQA requirements.

CEQA Guidelines Section 15064.3

As stated above, changes to the CEQA Guidelines a few years ago include the adoption of section 15064.3, Determining the Significance of Transportation Impacts. Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence. Additionally, a lead agency may evaluate factors such as the availability of transit and proximity to other destinations to qualitatively analyze a project's potential VMT impacts.

Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR, 2018)

The *Technical Advisory* provides advice and recommendations to CEQA lead agencies on how to implement the changes made in section 15064.3. This includes technical recommendations regarding the assessment of VMT, thresholds of significance, VMT mitigation measures, and screening thresholds for certain land use projects. Lead agencies may consider and use these recommendations at their discretion and with the provision of substantial evidence to support alternative approaches. The *Technical Advisory* describes considerations agencies may use in selecting VMT metrics, calculation methodologies, and significance thresholds. The *Technical Advisory* does not mandate the use of specific metrics, methodologies or significance thresholds, because agencies have discretion to select those that are appropriate for the local land use and transportation context.

Regarding retail projects, the *Technical Advisory* recommends that "[g]enerally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns." The "change in total VMT" method includes evaluation of a

project's likelihood of diverting existing trips and the effect of such diversion on total VMT. The *Technical Advisory* also recommends that the "analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries."

The *Technical Advisory* also acknowledges that significance thresholds may be best determined on a case-by-case basis in rural areas. In setting thresholds for unique land use types or specific projects, the *Technical Advisory* recommends that "lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7)."

The *Technical Advisory* identifies the following recommended numeric VMT thresholds for office and retail projects:

- Office projects that would generate vehicle travel exceeding 15 percent below (i.e., greater than 85 percent of) existing regional VMT per employee may indicate a significant transportation impact.
- Retail projects (and other non-residential/non-office projects) that result in a net increase in total VMT may indicate a significant transportation impact.

The *Technical Advisory* offers guidance regarding the above project types because "they tend to have the greatest influence on VMT".

Regarding trucks, the *Technical Advisory* first points out that CEQA Section 15064 refers to automobiles when referencing VMT. The document then offers a definition that automobiles consist of on-road passenger vehicles, including cars and light duty trucks. It further states that "Heavy-duty truck VMT could be included for modeling convenience and ease of calculation." No further guidance is provided relating to how to address travel impacts of trucks, though Appendix 1 (Considerations About Which VMT to Count) and Appendix 2 (Induced Travel: Mechanisms, Research, and Additional Assessment Approaches) repeatedly refer to automobiles (and do not mention trucks) when describing these topics.

Caltrans

Caltrans is responsible for planning, designing, constructing, operating, and maintaining the State Highway System (SHS). Any improvements or modifications to the SHS within the study area would need to be approved by Caltrans. The following Caltrans planning documents emphasize the State of California's focus on transportation infrastructure that supports mobility choice through multimodal options, smart growth, and efficient development:

- Smart Mobility Framework (Caltrans February 2010),
- Complete Streets Implementation Action Plan (Caltrans 2010),

- California Transportation Plan 2040 (Caltrans 2016),
- Strategic Management Plan 2015-2020 – 2019 Update (Caltrans 2019),
- State Highway System Management Plan (Caltrans 2019),
- VMT-Focused Transportation Impact Study Guide (Caltrans 2020), and
- Caltrans 2020–2024 Strategic Plan (Caltrans 2021).

Among these various reports, the following two documents are most applicable to the project.

VMT-Focused Transportation Impact Study Guide (TISG)

On May 20, 2020, the *VMT-Focused Transportation Impact Study Guide ("TISG")* was adopted by Caltrans (2020). The *TISG* provides guidance on how Caltrans will review land use projects, with focus on VMT analysis and supporting state land use goals, state planning priorities, and GHG emission reduction goals; as well as identifying land use projects' possible transportation impacts to the State Highway System and potential non-capacity increasing mitigation measures. The *TISG* indicates that Caltrans intends to "transition away from requesting LOS or other vehicle operations analyses of land use projects," instead placing the focus on VMT and safety.

The *TISG* emphasizes that VMT analysis is Caltrans' primary review focus and references the *Technical Advisory* as a basis for the guidance in the *TISG*. Notably, the *TISG* recommends the use of the recommended thresholds in the *Technical Advisory* for land use projects. The *TISG* also references the *Technical Advisory* for screening thresholds that would identify projects and areas presumed to have a less-than-significant transportation impact. Caltrans supports streamlining for projects that meet these screening thresholds because they help achieve VMT reduction and mode shift goals. The *TISG* does not contain any guidance for how to treat truck travel.

Local Development Review (LDR) Safety Review Practitioners Guidance

The *Local Development Review (LDR) Safety Review Practitioners Guidance* (Caltrans, 2024) advises practitioners how to evaluate project-related safety impacts on the state highway system. It stops short of including specific thresholds of significance. The analytical approach described in the guidance focuses on vulnerable road users (i.e., bicyclists and pedestrians) and underserved communities; enhancing safety for pedestrians, bicyclists, transit, and vehicular modes; and applying both reactive and systemic perspectives. Lastly, it reiterates Caltrans supports for shifting away from using delay-based metrics for analysis in CEQA.

The guidance does not offer any suggested practices for evaluating queuing at turn lanes on the state highway system. However, queues that spill out of a left-turn lane on a conventional highway can present similar safety concerns as a freeway off-ramp, for which the document does offer guidance.

Lastly, the guidance identifies the following six challenge areas as high priorities in California as they represent the greatest opportunity to reduce fatalities and severe injuries: lane departures, impaired driving, speed management, pedestrians, bicyclists, and intersections. This topic is analyzed in this report through detailed collision analysis and safety features on the state highway system near the project site.

REGIONAL

Lassen County Regional Transportation Plan

The Lassen County Transportation Commission (LCTC) is the Regional Transportation Planning Agency (RTPA) for Lassen County. LCTC released the Lassen County Regional Transportation Plan (RTP) in November 2023. This document prioritizes and allocates funding for transportation projects within Lassen County. It provides a coordinated, 20-year vision of the regionally significant transportation improvements and policies needed to efficiently move goods and people within the region. The RTP contains the following goals:

- Goal 1: Develop and maintain a comprehensive, efficient, and safe transportation system to serve the needs of County residents and to stimulate the economic progress of the County.
- Goal 2: To provide adequate cost-effective public transit services, especially to accommodate the needs of the elderly and handicapped.
- Goal 3: Promote the continuous flow of goods in, out of, and through the County in a safe and economically efficient manner.
- Goal 4a: Provide an adequate number of safe, efficient airports and airfields.
- Goal 4b: Support the expansion of economical, efficient air services.
- Goal 5: Provide a safe and efficient bicycle and pedestrian circulation system that takes advantage of the natural scenery and physical characteristics of Lassen County.
- Goal 6a: Minimize traffic delays by increasing the efficiency of the existing transportation system through Transportation System Management (TSM) techniques.
- Goal 6b: Where feasible, reduce the demand for travel by Single Occupant Vehicles (SOVs) through Transportation Demand Management (TDM) techniques.
- Goal 7: Reduce GHG emissions from transportation-related activities within the Lassen County boundaries to support the state's efforts under AB-32 and to mitigate the impact of climate change.

Each goal is accompanied by several supporting policies and objectives, which can be found in pages 47-53 of the RTP.

The RTP contains the following planned transportation projects in the project vicinity:

1. SR 36 Complete Streets and Safety Mobility Improvements ($16 million).
2. Susanville Southeast Gateway ($2.5 million).
3. Riverside Drive Bike Path – Class I facility on the south side of Riverside Drive from Fruit Growers Park to the Susan River Trail, crossing Riverside Drive ($2.8 million).
4. Skyline Bike Path Connection to Bizz Johnson Trail – westerly continuation of Class I facility on Skyline Road that terminates at SR 36 to connect with Bizz Johnson Trail ($1.4 million).
5. Riverside Skyline / Bizz Johnson Trail Connection – Class I trail connecting the Riverside Bike Path to the proposed Skyline Extension to the Bizz Johnson Trail ($350,000).

The above projects are described in more detail in Chapter 4 (Cumulative Setting).

Lassen County Active Transportation Plan

The *Final Report for the Lassen County Active Transportation Plan* (2022) [1] describes existing and planned bicycle and pedestrian facilities throughout Lassen County (including within the City of Susanville). It identifies active transportation needs and potential funding sources. The following are the priority projects included in the plan near the project site:

- Skyline Class I Bike Path from Johnstonville Road to the Bizz Johnson Trail – Extension of the existing Class I facility on the old railroad alignment will help to provide parallel capacity to SR 36 for non-motorized uses. The trail would require acquisition of property from the railroad. Recently, the parcel immediately east of the railroad depot was purchased by Lassen Land Trails and Trust.

Lassen County Local Roadway Safety Plan (LRSP)

The Final Report, prepared by LSC in 2022, is available on the county's website. However, it does not present any data or analysis on SR 36 or Skyline Road. Consequently, the LRSP is not referenced any further in this report.

[1] Found at: ENC Cover (lassenctc.com). Accessed on February 18, 2025.

LOCAL

City of Susanville General Plan

In March 2024, the City of Susanville adopted an updated Circulation Element.[2] Relevant goals and policies from this document are described below.

Goal CIR-1 **The City of Susanville shall work with Lassen County and the Lassen County Transportation Commission (LCTC) to develop and maintain a comprehensive, efficient, and safe transportation system to serve the needs of City residents and to stimulate Susanville's economic progress.**

Policy CIR-1.4: Safety. Safety shall be a priority when planning and designing transportation infrastructure improvements in the City of Susanville. All improvements should include industry accepted safety measures for intersections and roadways.

Policy CIR-1.10: Vehicle Miles Travelled (VMT). The City of Susanville shall use VMT rather than Level of Service (LOS) as the SB 375 required metric to measure transportation impacts on the environment for CEQA and other environmental factors and determinations.

Policy CIR-1.11: Complete Streets. Create transportation enhancements in the city that prioritize "complete streets" designs, allowing for easy and safe access for all users, particularly those who prefer or rely on walking, cycling, and transit

Policy CIR-1.14: SR 36 Expressway. Continue to encourage and support the improvement of SR 36 from Susanville to Johnstonville as a four-lane expressway.

Goal CIR-2 **LCTC shall work closely with the City of Susanville and transit providers to provide adequate, cost-effective public transit services.**

Policy CIR-2.5: Route Revisions. Continue to revise routes to reduce travel times, establish more frequent service, and serve more transit activity centers.

Goal CIR-3 **Explore the utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single occupancy vehicles (SOVs) where feasible.**

Policy CIR-3.1: TDM Measures. Encourage measures to reduce vehicle-miles travelled (VMT). Examples include transit incentives, park and ride facilities, and telecommuting facilities.

Policy CIR-3.2: Transit Mode Share. Implement recommendations in regional transit plans to increase the mode share of public transit in the City of Susanville.

[2] SUSGP_Final_Circulation_Element_Update.pdf

Goal CIR-4 Provide a safe and efficient multimodal network within and surrounding the City of Susanville.

Policy CIR-4.1: Micro-transit. Provide more coverage to areas without a fixed route service using micro-transit.

Policy CIR-4.2: Transportation Network Companies (TNCs). Encourage TNCs such as Uber and Lyft, to provide a reliable number of vehicles in the Susanville area.

Goal CIR-5 Explore and encourage alternative forms of more efficiently providing public transportation to the residents or visitors of Susanville.

Policy CIR-5.1: Enhancing Safety. Develop a bikeway system that enhances the safety and convenience of bicycling or walking to work or school. This should include making improvements to crossing protections at major intersections.

Policy CIR-5.2: Universal Design. Require pedestrian facilities to be ADA compliant and accessible for people of all abilities.

Goal CIR-6 Include bikeway facilities in all appropriate future development projects to facilitate on-site circulation for bicycle travel, on-site bicycle parking, and connections to the proposed system.

Policy CIR-6.3: Bicycle Facilities. Support provision of parking, shelters, and off-street facilities, where feasible and practical, to promote bicycle and pedestrian travel. Require future developments that might experience a high bicycle demand, such as commercial areas, parks, libraries, and schools, to support these facilities.

Goal CIR-7 Improve pedestrian networks and amenities to create more safe and walkable neighborhoods.

Policy CIR-7.3: Street Lighting. Enhance street lighting, as necessary, to provide better pedestrian safety.

Policy CIR-7.4: Pedestrian Crossings. Enhance the safety of local intersections by pursuing signage and overhead pedestrian crossing especially along Main Street.

Background information contained in the updated *City of Susanville Circulation Element* (2024) is utilized in this study. This includes certain Vehicle Miles of Travel (VMT) metrics, which are described in more detail later.

2. ENVIRONMENTAL (EXISTING) SETTING

This chapter describes the existing transportation system including the roadway, bicycle, pedestrian, and transit facilities in the project vicinity.

Roadway System

This section is divided into the following six topical areas:

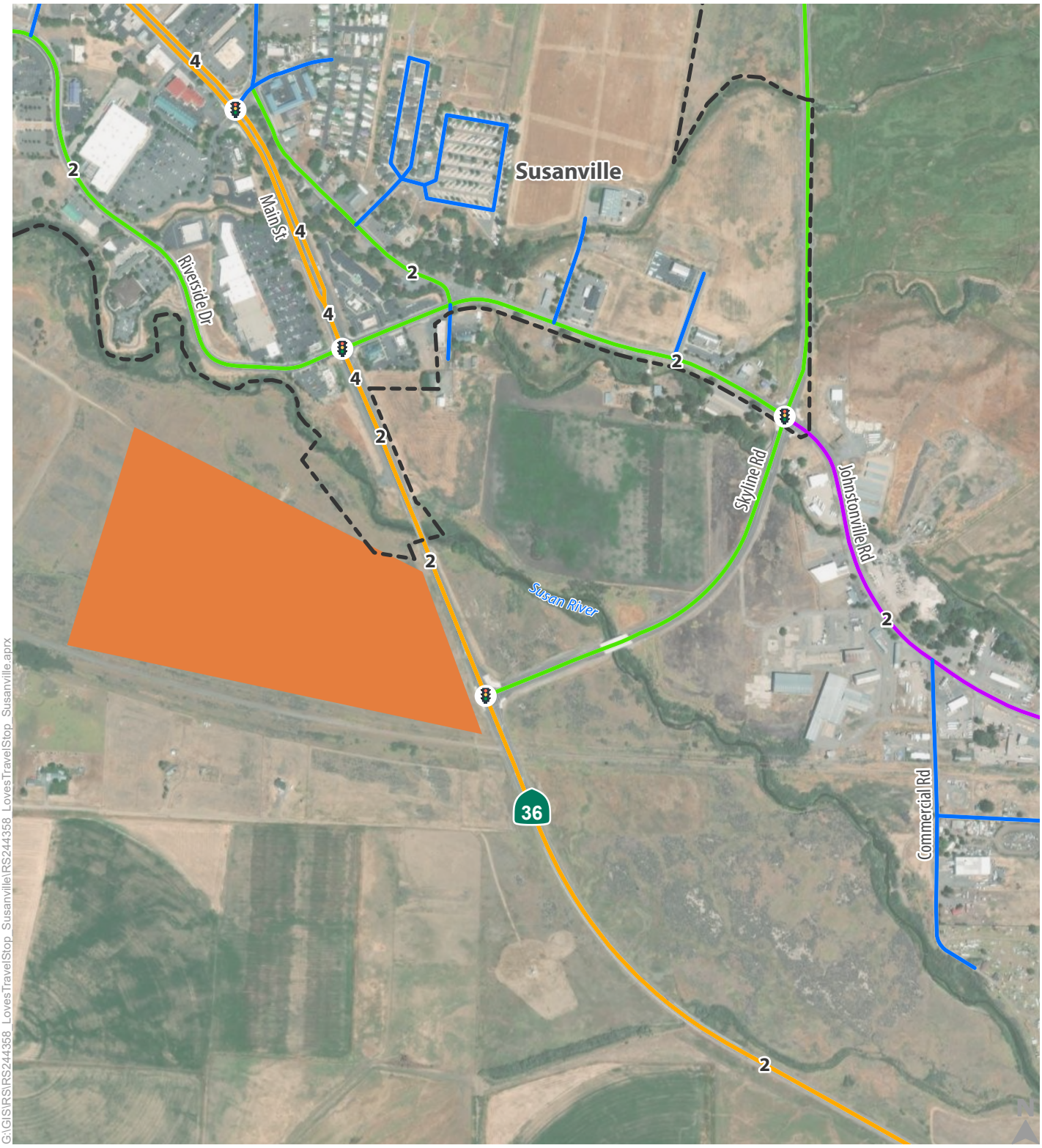
- Existing Roadways
- Truck Routes
- Existing Traffic Volumes
- SR 36/Skyline Road Intersection Geometrics and Signal Operations
- Vehicle Queuing
- SR 36 Study Area Safety Features and Collision History

Existing Roadways

The roadway system in the project vicinity consists of State Route 36, and several city/county streets. **Figure 3** displays the functional classification and number of lanes on roadways in the project vicinity. This figure is derived from the Lassen County General Plan and public review draft City of Susanville General Plan circulation maps. Key roadways in the study area include the following:

- **State Route (SR) 36/Main Street**[3]: SR 36 is the only road in Susanville that has a principal arterial functional classification and acts as the city's main street through downtown. The following describes the various cross-sections of SR 36 within the study area:
    - SR 36 (north of Riverside Drive): four-lane median divided highway featuring a two-way left-turn lane (TWLTL).
    - SR 36 from Riverside Drive to Skyline Road: narrows immediately south of Riverside Drive from four lanes to a two-lane undivided highway with passing prohibited.
    - SR 36 south of Skyline Road: two-lane undivided highway that includes a 1.7-mile section where passing is permitted.

[3] For purposes of this report, segments and turn movements along SR 36 in the project vicinity are described as being northbound or southbound based on the highway's actual geographic orientation near the project site. This is in contrast to its designation as an east-west highway (by virtue of Caltrans state highway numbering conventions).



Project Site

Susanville City Limit

Roadway Functional Classification

Principal Arterial

Minor Arterial

Major Collector

Local

Signalized Intersection

= Number of travel lanes (Both directions combined, excluding turn lanes)

Figure 3

Existing Roadway Network

The posted speed limit on northbound SR 36 gradually tapers approaching downtown Susanville. Just north of US 395 in Johnstonville, the roadway has a posted speed limit of 55 miles per hour (mph). The speed limit drops to 50 mph just south of Skyline Road and drops to 40 mph approaching Riverside Drive. The posted speed limit north of Riverside Drive (within downtown Susanville) is 30 mph. In the southbound direction departing Susanville, the posted speed limit increases to 50 mph south of Riverside Drive and then increases to 55 mph south of Skyline Road.

- **SR 139 (Ash Street)**: begins at SR 36 where it is known as Ash Street. It extends northerly as a two-lane undivided road through Susanville and into unincorporated Lassen County. It connects the City of Susanville to the City of Alturas and other rural communities to the north. SR 139 has a minor arterial functional classification.
- **Skyline Road** is classified as a two-lane minor arterial. It begins at SR 36 and extends in a northeasterly direction for 2.5 miles to SR 139. It continues beyond SR 139 for 1.3 miles, terminating at Paiute Lane. Skyline Road provides access to residential areas in the north and east areas of the city along with Lassen Community College situated on SR 139. Its only posted speed limit is a 55 mph sign situated in the southbound direction south of SR 139. The connection of Skyline Road to SR 36 was completed and opened to traffic in late 2020 / early 2021.
- **Riverside Drive** extends 1.8 miles in a northwestern direction from SR 36 at the south edge of Downtown Susanville, terminating at Richmond Road. It is an important city street, providing access to various retail and office uses, Susan River recreational sites, residential areas, the Lassen County Government Center, Lassen County Superior Court, and Bureau of Land Management offices. It also extends east of SR 36 for 600 feet where it becomes Johnstonville Road. It is classified as a two-lane minor arterial with posted speed limits of 25 or 30 mph depending on the segment.

Susanville sits at an elevation of 4,186 feet. On average, it receives snowfall about 53 days per year with total accumulation of 43 inches[4]. This suggests that large accumulations over a single day do not typically occur. Through internet literature searches, it is apparent that mandatory four-wheel drive or chain controls are in effect along certain parts of SR 36 during adverse weather events. No signage is present in the project vicinity indicating that chain controls are implemented during adverse weather conditions. However, a sign is present stating "Watch for Snow Removal Equipment".

[4] Source: Yearly & Monthly weather - Susanville, CA (weather-us.com). Accessed on August 5, 2024.

Truck Routes

Caltrans website[5] shows that State Routes 36 and 44 in Lassen, Shasta, and Plumas counties are STAA terminal access routes, as is US Highway 395 in Lassen County. The 10-mile segment of SR 36 between SR 44 (west of Susanville) to US Highway 395 (east of Susanville) is an important truck route corridor. It is the preferred route that long-distance trucks use to travel between Reno and Redding. It also allows trucks to access local cities/communities such as Susanville, Johnstonville, Westwood, and Chester.

SR 139 north of SR 36 is a 65-foot California Legal Truck Route with a 30-foot KPRA (i.e., maximum distance from kingpin to rear axle). There are no restrictions on the use of Skyline Road by trucks, though it is not posted as a STAA route.

Existing Traffic Volumes

Caltrans website[6] reports the estimated Average Annual Daily Traffic (AADT) volume and peak month ADT volume at locations throughout the state highway system. According to Caltrans, most locations are not counted each year, and "the resulting counts are adjusted to an estimate of the AADT by compensating for seasonal influence, weekly variation, and other variables which may be present".

Table 1 displays the Caltrans' reported Average Annual Daily Traffic (AADT) and peak month ADT, and peak hour volume of peak month on SR 36 between Riverside Avenue and Skyline Road for the six-year period from 2017 through 2022, inclusive. Note that 2022 is the most recent year that data is available on the Caltrans website as of this report date.

[5] Source: truckmap-d02 - draft (ca.gov). Accessed on July 9, 2024.

[6] Found at: Traffic Census Program | Caltrans. Accessed on July 9, 2024.

Table 1: 2017-2022 Traffic Volumes on SR 36 between Riverside Drive and Skyline Road			
Year	**Average Annual Daily Traffic (AADT)**	**Peak Month**	
		Average Daily Traffic (ADT)	**Peak Hour Volume**
2017	16,700	17,800	1,800
2018	16,000	17,000	1,700
2019	15,600	16,200	1,600
2020	14,000	15,000	1,550
2021	14,500	16,000	1,600
2022	14,400	15,000	1,600

Source: Caltrans, 2024. Traffic Census Program | Caltrans

Key findings from this table are:

- While traffic volumes on SR 36 south of downtown Susanville appear to have been steadily decreasing since 2017, there are several unique factors that likely contributed to this including:
    - The large drop in 2020 is likely attributable to the peak of the COVID-19 pandemic, during which major decreases in travel were observed nationwide.
    - Although not known if explicitly considered in the Caltrans data, the multi-county Dixie Fire in Summer 2021 likely contributed to overall lower average annual totals. During this time, Lassen National Park (situated 80 miles northeast of Susanville) was closed as were various campgrounds and other recreational sites.
    - The completion of the Skyline Road connection in 2020/2021 shifted some traffic away from SR 36 through downtown Susanville. Caltrans data shows the volume on SR 139 east of SR 36 decreased from 5,900 AADT in 2018 to 5,400 AADT in 2022, suggesting the counts are sensitive to this new connection.

As an additional check of the reasonableness of the data in Table 1, the Caltrans PeMS (Performance Measurement System) [7] database was reviewed to determine if any recent counts along SR 36 are available. This system reports hourly traffic volumes from in-pavement detectors located throughout the state highway system. A functional detector was found on SR 36 between Riverside Drive and SR 139 (i.e., in downtown). Unfortunately, only a limited amount of data from May and August 2019 was available. The data revealed the following mid-week averages:

[7] Source: Caltrans PeMS, Accessed on July 10, 2024.

- Early/mid-May 2019 (average of three days of counts): 16,800 ADT and 1,380 peak hour volume
- Mid/late-August 2019 (average of three days of counts): 16,500 ADT and 1,390 peak hour volume[8]

The Caltrans 2019 data from its website for this segment, which is not the same segment whose data is shown in Table 1, shows 16,200 peak month ADT and 1,500 peak hour volume. This suggests these two independent sources of data yield consistent findings, further validating the volumes in Table 1.

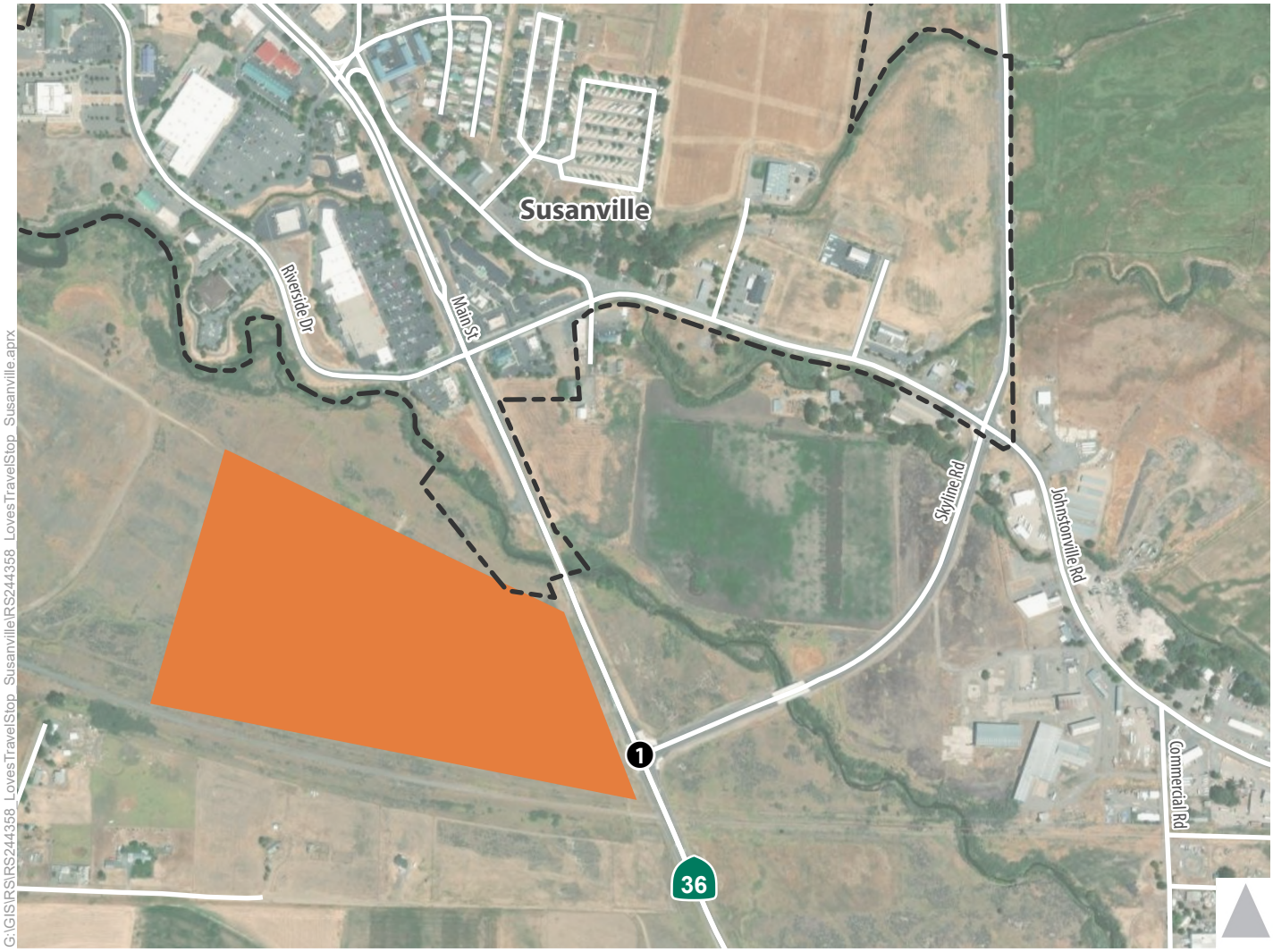
Fehr & Peers retained National Data Services (NDS) to conduct traffic counts at the SR 36/Skyline Road intersection on Wednesday, May 29, 2024, during the weekday AM (7 – 9 AM) and PM (3 – 6 PM) peak periods. At the time of the counts, schools within the Susanville School District were still in session (last day was June 6th). However, Lassen Community College (enrollment of about 1,600 students) was already out of session and had not yet begun summer school. To overcome the challenge of the traffic counts not reflecting college traffic, data was purchased from StreetLight, Inc. This company uses anonymous mobile device data to estimate traffic conditions. The acquired dataset was from mid-weekdays in Spring 2023 when schools were in session.

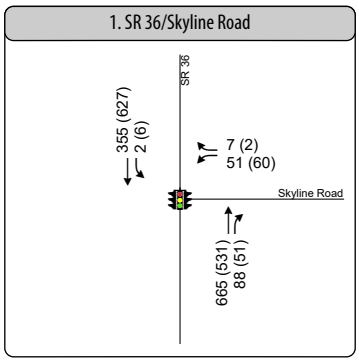
In addition, peak hour traffic data from the *SR 36 Complete Street and Safe Mobility Report* (Mark Thomas, 2020) was obtained for the SR 36/Riverside Drive intersection. For that study, counts were collected in January 2019 and factored up by its authors to reflect peak weekday conditions. Fehr & Peers used the factored-up data to establish the amount of AM and PM peak hour traffic in each direction of SR 36 south of Riverside Drive. Because those volumes reflected a condition prior to Skyline Road connecting to SR 36, an additional step was needed to reflect some trips being rerouted to Skyline Road. Those redirected volumes were based on the Streetlight data from 2023.

The resulting weekday AM and PM peak hour volumes used for subsequent analyses in the study are shown on **Figure 4**. The AM peak hour occurred from 7:30 to 8:30 AM and the PM peak hour occurred from 5 to 6 PM. Traffic volumes within each peak hour were consistent across each 15-minute interval, with peak hour factors (PHFs)[9] of 0.95 observed.

[8] These two data points result in a measured, average k-factor (ratio of daily to peak hour traffic) of 8.3%. This value is used later in this chapter to estimate the ADT on the study segments of SR 36.

[9] The peak hour factor (PHF) measures the degree of variation in traffic within the peak hour. A PHF of 1.0 indicates no variation. The lower the PHF, the more variation occurs. Because the PHF is applied in traffic operations analyses, the reported results are representing the busiest 15-minutes of the peak hour.





Turn Lane

AM (PM) Peak Hour Traffic Volume

Traffic Signal

Study Intersection

Project Site

Susanville City Limit

Figure 4

Weekday AM and PM Traffic Volumes and Lane Configurations - Existing Conditions

Truck Traffic

The *Highway Capacity Manual* (Transportation Research Board, 2022) defines a truck as all vehicles with three or more axles and vehicles with two axles and dual tires on the rear axle. Caltrans website distinguishes between regular two-axle vehicles and two-axle trucks. Traffic data from this website that trucks represented 9.0% of the 2022 AADT on SR 36 between Skyline Road and Riverside Drive. Similar to the AADT estimates, these are estimated values and not verified values. However, a pair of verified counts (from the PeMS database) in 2016 and 2019 on US Highway 395 both north and south of its junction with SR 36 revealed 10% and 12.5% trucks, respectively. A Caltrans study (SR 36 Capital Preventative Maintenance project) completed in 2016 assumed 8% trucks for traffic forecasting and analysis purposes. The same 8% trucks assumption was also used in the *SR 36 Complete Street and Safe Mobility Report*.

The May 2024 traffic counts by NDS at the SR 36/Skyline Road intersection separately tracked trucks, recreational vehicles (RVs), bicyclists, and pedestrians passing through the intersection. **Table 2** displays the percentage of vehicular travel consisting of trucks and RVs for each turning movement during each peak hour. Refer to Appendix A for traffic count sheets.

Table 2:
Percent Trucks and RVs by Movement at SR 36/Skyline Road Intersection – Existing Conditions

Movement	AM Peak Hour		PM Peak Hour	
	Trucks	RVs	Trucks	RVs
SR 36 NB TH	3.9%	0%	3.9%	0.6%
SR 36 NB RT	2.5%	0%	7.8%	0%
SR 36 SB LT	0%	0%	0%	0%
SR 36 SB TH	7.7%	0%	5.1%	0%
Skyline Road WB LT	11.8%	0%	6.6%	0%
Skyline Road WB RT	0%	0%	0%	0%
Total	5.5%	0%	4.8%	0.2%

Notes:
1. Based on turning movement counts collected on Wednesday, May 29, 2024.
2. Refer to above text for definition of trucks.

Source: Fehr & Peers, 2025.

This table indicates that trucks were about 4% of all vehicles for the northbound through movement, and 5% for the AM peak hour and 8% for the PM peak hour of vehicles for the southbound through movement. It is typical for truck percentages to be lower during peak hours as the result of commute traffic added to those periods and trucking operations not necessarily coinciding within a typical 8 AM to 5 PM timeframe.

Table 3 shows the traffic stream composition on SR 36 at Skyline Road including the absolute numbers of total vehicles, trucks, and RVs. These values are derived from the various traffic data sources discussed previously. They represent Year 2024 conditions with schools in session. Note that trucks are in the 4% to 8% range on SR 36 during peak hours, and 8% of all traffic on a daily basis.

Table 3:
Traffic Stream Composition on SR 36 and Skyline Road Adjacent to Project Site – Existing Conditions

Roadway and Direction of Travel	Segment	Weekday			AM Peak Hour (7:30 – 8:30)			PM Peak Hour (5:00 – 6:00)		
		Total Vehicles [1]	Trucks [2]	RVs [3]	Total Vehicles [1]	Trucks [2]	RVs [3]	Total Vehicles [1]	Trucks [2]	RVs [3]
Northbound on SR 36	North of Skyline Road	Daily Traffic by Direction Not Applicable			672	26	0	533	21	3
	South of Skyline Road				753	28	0	582	25	3
Southbound on SR 36	North of Skyline Road				357	27	0	633	32	0
	South of Skyline Road				406	33	0	687	36	0
Total on SR 36	North of Skyline Road	14,000	1,120	42	1,029	53	0	1,166	53	3
	South of Skyline Road	15,300	1,220	46	1,159	61	0	1,269	61	3
Eastbound on Skyline Road	East of SR 36	Daily Traffic by Direction Not Applicable			90	2	0	57	4	0
Westbound on Skyline Road	East of SR 36				58	6	0	62	4	0
Total on Skyline Road	East of SR 36	1,800	100	4	148	8	0	119	8	0

Notes:
1. Daily total volumes rounded to the nearest one hundred vehicles. ADT on SR 36 and Skyline Road based on 8.3% k-factor (see prior page for its derivation).
2. Daily truck volumes rounded to the nearest 10 vehicles. Trucks represent 8% of all traffic on a daily basis per Caltrans data.
3. RVs assumed to represent 0.03% of all traffic on a daily basis based on five-hours of counts on Wednesday, May 26, 2024 that showed this proportion.

Source: Fehr & Peers, 2025.

SR 36/Skyline Road Intersection Geometrics and Signal Operations

The SR 36/Skyline Road intersection is controlled by a traffic signal. Signal operation features consist of the following:

- Actuated, uncoordinated operations (i.e., light turns green when vehicle is detected).
- Southbound left-turn protected phasing (i.e., left-turn movement is given a green arrow, meaning it is protected).
- Northbound right-turn has an overlap arrow (i.e., right-turn arrow is green simultaneously with the westbound left-turn movement).

Images 1-3 below show the view of the signalized intersection looking toward the north, south, and west, respectively. Images 1 and 2 show a wide shoulder (about 8 feet) present on the west side of SR 36, with a narrower (about 4 feet) shoulder on the east side.

Details about the signal's pedestrian and bicycle features as well as safety features are presented later in this chapter.



Image 1: View looking north on SR 36 toward signal at Skyline Road.



Image 2: View looking south on SR 36 toward signal



Image 3: View looking west on Skyline Road toward signal

Vehicle Queuing

Vehicle queuing is analyzed at the SR 36/Skyline Road study intersection to determine whether turn pocket storage is currently adequate and whether it could potentially be exceeded by the addition of project trips.

Traffic volumes, lane configurations, vehicle fleet mix, traffic controls, signal timings, and other inputs were entered into a Simtraffic microsimulation model, which then reports the 95th percentile queues for all intersection movements. The 95th percentile queue represents a length of queued traffic for which there is a 5% or less probability that the actual queue would be greater. Because trucks represent a significant portion of the vehicle fleet mix in the project vicinity, the proportion of trucks and their average lengths were explicitly entered into the model. This methodology is consistent with procedures described in the latest edition of the *Highway Capacity Manual*. To facilitate direct comparisons between scenarios, the precise (non-rounded) 95th percentile queue (in feet) is reported. Consistent with standard practice, SimTraffic analysis results are the average of 10 SimTraffic runs.

Table 4 shows the 95th percentile queue lengths estimated at the study intersection. As shown, the 95th percentile queues do not exceed the available turn lane storage at each location. Refer to **Appendix A** for technical calculations.

Table 4:
95th Percentile Vehicle Queues at the SR 36/Skyline Road Intersection – Existing Conditions

Direction	Movement	Available Storage[2]	95th Percentile Queue (feet)[1]	
			AM Peak Hour	PM Peak Hour
Northbound	Through	2.4 mile	165	134
	Right-Turn	500 feet	40	31
Southbound	Left-Turn	310 feet	12	23
	Through	2,100 feet	108	139
Westbound	Left-Turn	275 feet	69	63
	Right-Turn	2,400 feet	17	8

Notes:
1. 95th percentile queue based on output from SimTraffic model.
2. Storage measured based on aerial imagery using length of turn pocket or distance to upstream intersection for through movements.
Source: Fehr & Peers, 2025.

SR 36 Study Area Safety Features and Collision History

The following safety elements are present approaching and departing the SR 36/Skyline Road intersection:

1. **The northbound direction of SR 36 south of Skyline Road has Signal Ahead pavement markings, and a Signal Ahead (W3-3) sign with an attached flashing warning beacon.** Page 273 of the *California Manual of Uniform Traffic Control Devices* (CA MUTCD) (Caltrans, 2014) indicates the following with respect to the placement of this sign:

   > *"These signs shall be installed on an approach to a primary traffic control device that is not visible for a sufficient distance to permit the road user to respond to the device (see Table 2C-4). The visibility criteria for a traffic control signal shall be based on having a continuous view of at least two signal faces for the distance specified in Table 4D-2."*

   The sign is situated on the right side of the roadway about 1,000 feet south of the intersection along a segment of SR 36 with gradual horizontal curvature. Review of Google maps aerial imagery indicates that two signal heads are visible from this location. Nevertheless, the placement of this sign and the pavement markings provides additional advanced driver warning information. A Signal Ahead sign is not situated on southbound SR 36 approaching Skyline Road as the roadway is straight.

2. **All signal heads at the SR 36/Skyline Road intersection have backplates framed with a retroreflective border.** Backplates added to traffic signal heads improve the visibility of the illuminated face of the signal by introducing a contrasting background, both in daytime and nighttime conditions. The FHWA *Proven Safety Countermeasures Initiative* estimates that this countermeasure reduces collisions affected by this signal head visibility by 15%.[10]

3. **The northbound and southbound through motorists on SR 36 at Skyline Road encounter a innovative type of signal head, in which there are a pair of closely spaced red ball signal indications.** Below the pair of red signal indications are single yellow and green indications. This same treatment is present on SR 36 at Riverside Drive and US 395/Richmond Road.

4. **The yellow and all red signal timings are set in consideration of travel speeds on SR 36.** According to the signal timing plans provided by Caltrans, the SR 36 approaches have 5.5 and 5.9 second yellow clearance intervals. These clearance intervals are based on the prevailing speeds on SR 36. Additionally, a 1-second all red interval is also provided on the SR 36 approaches, thereby adding an additional safety factor against collisions involving red light running.

5. **Intersection lighting (via luminaires atop signal poles) is provided in the northwest, southwest, and southeast corners of the intersection.**

[10] Source: Backplates with Retroreflective Borders | FHWA (dot.gov). Accessed August 5, 2024.

6. **Edge of roadway treatments are present on the recently reconstructed west side of SR 36 (to support the new traffic signal) that are more tapered versus a vertical drop-off at the pavement edge.** This practice is known to have less severe outcomes associated with vehicles leaving the roadway and is included in the FHWA countermeasures list.

Advisory Warning Signs

A Pedestrian Crossing (W11-2) sign is located on northbound SR 36 between Skyline Road and Riverside Drive. This sign has been present at this location since at least 2007 (according to Google maps). According to the CA MUTCD, these signs "may be used to alert road users in advance of locations where unexpected entries into the roadway might occur or where there is shared use of the roadway by pedestrians." Its presence predates the "Welcome to Susanville" sign adjacent to it that may attract occasional stops along the roadway to take photos. It is possible that SR 36 experiences occasional pedestrians walking along the highway.

Collision History

The collision history of the SR 36 corridor in the vicinity of Skyline Road was documented using the Transportation Injury Mapping System (TIMS) database. This is a free and publicly available dataset of reported injury collisions on local and state roadways. TIMS data was for the 7.5-year period from January 1, 2017 through June 30, 2024. This dataset provides numerous variables associated with each collision including time of day, day of week, date, primary collision factor, collision type, number of involved parties, collision severity, weather conditions, lighting, pavement conditions, involvement of bicyclist, pedestrian, or motorcycle, driver impaired, driver age and gender. The TIMS data also includes the latitude and longitude of each collision, allowing for spatial analysis of the data. The TIMS database classifies collisions as either fatal, severe, or injury-only. Key findings from this dataset are:

- Since its construction in late 2020/early 2021 through June 2024, the SR 36/Skyline Road intersection experienced one reported injury collision. This crash occurred in February 2024 about 300 feet south of the intersection. It was a rear-end collision between two northbound vehicles, resulting in a minor injury. Weather conditions were cloudy, and the primary collision factor (PCF) was unsafe speed.
- The SR 36/Riverside Drive and SR 36/US 395/Richmond Road intersections experienced two and four injury collisions, respectively, during this time period. Two mid-segment collisions were reported between Skyline Road and US 395.
- None of the seven collisions listed above involved a vulnerable roadway user (i.e. bicyclist or pedestrian). Additionally, none involved a truck.

Bicycle and Pedestrian System

Image 4 shows the following two types of bicycle facilities located in the project vicinity.

Class I bicycle paths or multi-use paths are located off-street and typically permit use by both bicyclists and pedestrians.

Class II bicycle facilities are commonly known as "Bike Lanes" which share the roadway with motorized vehicles, typically following the same direction as automobile traffic. Class II facilities use striped marking that acts as a buffer from adjacent motorized traffic lanes. To comply with Caltrans' requirements, a Class II facility should be at a minimum 4 feet wide.



Image 4: Illustration of Class I and II bicycle facilities

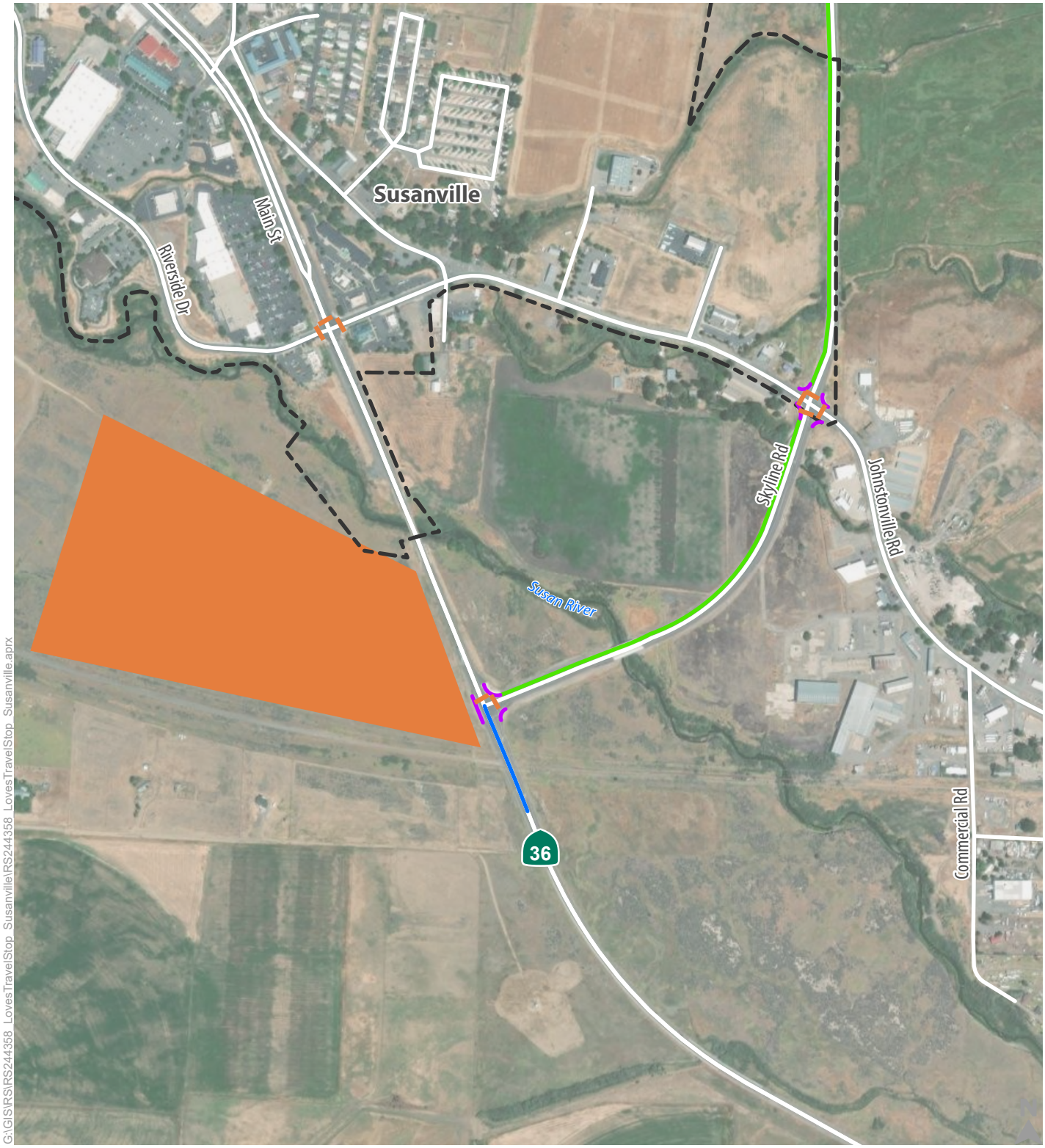
The following bicycle facilities are present in the project vicinity (see **Figure 5**):

- Skyline Road Class I Multi-Use Path – This off-street path runs along the north/west side of Skyline Road between SR 36 and SR 139. Along the pathway, several "Bike Lane" signs are erected. However, because it is physically separated from the roadway, it is not actually a Class II bike lane.
- Class II Bike Lane on Northbound SR 36 – a 500-foot Class II bike lane is striped between the through and right-turn lanes. It consists of pavement markings, but no signage. The bike lane does not exist leading up to or beyond the intersection. This bike lane is shown on **Image 5**.

Other notable trails in the area (though outside the immediate project vicinity) include the Susan River Trail and the Bizz Johnson National Recreation Trail, the latter of which is discussed in more detail in Chapter 4 (Cumulative Conditions).

There is a "Share the Road" sign on southbound SR 36 south of Riverside Drive. No such signs are present elsewhere in the SR 36 study corridor.

Bicycle and pedestrian travel were recorded as part of the intersection counts. No pedestrians and one bicyclist (traveling northbound on SR 36) were observed during the five-hour count period at the SR 36/Skyline Road intersection. During a field visit in July 2024, a bicyclist was observed riding northbound on SR 36 between Johnstonville and Skyline Road (see **Image 6**).



Project Site
Susanville City Limit
Crosswalks
Sidewalks
Class II bike Lane (NB Only)
Class I Multi-Use Path

* = Much of SR 36 has shoulders of sufficient width to allow bicycling. However, it is not designated as a bike lane by any signage or pavement markings.

Figure 5

Note: Facilities shown are limited to SR 36 from Riverside Dr. to south limits of map and Skyline to north limits of the map.

Existing Pedestrian and Bicycle Facilities



Image 5: Class II bike lane on northbound SR 36 approaching Skyline Road



Image 6: Bicyclist on northbound SR 36 south of Skyline Road

In summary, parts (but not all) of this segment of SR 36 have shoulder widths suitable for biking, but lack any designated signs. This approach is likely necessitated by the presence of farm equipment that uses the shoulder to travel between fields (see Image 3 for example). When such circumstances are present, Class II bike lanes are typically not striped because the agricultural vehicle is not permitted to travel extended distances within them.

Pedestrian facilities in the immediate project vicinity include crosswalks on the north and east legs of the SR 36/Skyline Road intersection. Both crosswalks feature pedestrian push button activation, pedestrian countdown heads (i.e., seconds remaining in Flashing Don't Walk phase are shown), and an accessible pedestrian signal, which provides audible guidance such as, "Walk Sign is on to Cross Skyline Road". ADA ramps with truncated domes are present at each crosswalk start/end point. Crosswalks are also present at the SR 36/Riverside Drive and Skyline Road/Johnstonville Road signalized intersections. Field observations showed usage of the Class I Skyline multi-use path by pedestrians.

Transit System

The Lassen Transit Service Agency (LTSA) provides public transportation services in Lassen County. LTSA operates the Lassen Rural Bus System for local and inter-community routes. LTSA also has agreements with Lassen Senior Services and Big Valley 50 Plus to serve senior transportation needs. Other services in Lassen County includes paratransit / dial-a-ride services.

The nearest bus stop to the project site is located within the Safeway Shopping Center situated in the northwest quadrant of the SR 36/Riverside Drive intersection. The Susanville City Route and the West County route both stop at this location. Each route is described briefly below:

- The Susanville City Route is a looped route with the Safeway stop being the most southerly location. The route services various schools, governmental, residential, and commercial areas within city limits with 46 stops along the route. It operates on one-hour headways on weekdays with stops each hour 8 AM to 7 PM.[11]
- The Susanville City Express Route is a circular line with 19 stops departing from Lassen Community College. It operates from 10:30 AM to 3 PM on weekdays and stops at the Safeway Shopping Center.
- The West County Deviated Fixed Route provides three round trips per day on weekdays between Susanville and communities to the west. Passengers may flag down the bus along the route. Within the Walmart parking lot a short distance further north, South County Commuter Route has a stop.

It is about a ½ mile walk or bike ride to reach the project site from the nearest transit stop.

[11] Source: Layout 1 (lassentransportation.com). Accessed on August 2, 2024.

3. PROJECT TRAVEL CHARACTERISTICS

This chapter first presents the proposed project's land uses and expected travel characteristics. It then discusses how the project would affect vehicle queuing at the SR 36/Skyline Road intersection. Finally, it displays the project's VMT generation.

Project Description

Figure 2 shows the project site plan. Its trip generating land uses consist of the following:

- 4 truck fueling lanes/positions and 70 truck parking spaces
- 12 vehicle (auto) fueling pump positions
- 7,943 sq. ft. convenience store
- 3,474 sq. ft. fast-food restaurant with drive-through window
- 1,588 sq. ft. fast-food restaurant without drive-through window
- 10 overnight RV parking spaces

Access to the project site would be provided by the extension of Skyline Road (with one lane in each direction separated by a two-way left-turn lane) west of SR 36. A pair of driveways would be constructed on the north side of this extension to serve the project. Each driveway is described in detail below:

- Driveway A – would be situated about 485 feet west of Driveway B and provide access to the truck fueling islands and parking. The driveway would be 60 feet wide with 50-foot curb return radii. Skyline Road would terminate 50 feet west of this driveway, which would serve almost exclusively trucks.
- Driveway B – would be situated 610 feet west of SR 36 and provide access to the auto fuel pumps, convenience market, fast-food restaurants, and RV parking. The driveway would be 40 feet wide with 30-foot curb return radii. The convenience market and fast-food restaurants would also be accessible (by walking) from the truck area.

SR 36/Skyline Road Intersection Improvements

According to plans provided by the project's civil engineer, the proposed project includes construction of the following travel lanes on SR 36 at Skyline Road:

- 300-foot northbound left-turn lane on SR 36; and
- 250-foot southbound right-turn lane on SR 36.

Two sets of lane configurations, traffic signal phasing plans, and crosswalk treatments are analyzed on the Skyline Road approaches to SR 36. They are:

- **Alternative 1:**
  - New Eastbound Approach: consists of one left-turn lane and one shared through/right lane.
  - Existing Skyline Road Westbound Approach: is modified to consist of a left/through lane and an exclusive right-turn lane.
  - Signal Phasing: Due to the westbound shared left/through lane, the east-west approaches would necessarily operate with split phasing.
  - Crosswalk Treatments: Crosswalks would be added to the west leg and north leg (across SR 36) but would not be added to the south leg due to potentially inefficient signal operations (i.e., increased SR 36 queuing caused by successive pedestrian Walk signal phases across each crosswalk across SR 36).

- **Alternative 2:**
  - New Eastbound Approach: consists of one left-turn lane and one shared through/right lane.
  - Existing Skyline Road Westbound Approach: is modified to consist of one left-turn lane and one shared through/right lane.
  - Signal Phasing: the east-west approaches would operate with protected left-turn phasing.
  - Crosswalk Treatments: Crosswalks would be added to the west leg, north leg, and south leg.

In their January 28, 2026 comment letter on the DEIR, Caltrans expressed a preference for Alternative 2. For documentation purposes, both alternatives are analyzed in an equal level of detail.

Project Travel Characteristics

This section presents the project's expected trip generation and distribution/assignment characteristics.

Project Trip Generation

When transportation professionals are tasked with analyzing the expected number of vehicle trips generated by a proposed land use, the *Trip Generation Manual (TGM), 11th Edition* (Institute of Transportation Engineers, 2021) is typically the first resource considered. With regard to the proposed project, the TGM contains the following potentially applicable land use categories including:

- LUC 945: Convenience Store/Gas Station
- LUC 950: Truck Stop
- LUC 416: Campground / RV Park
- LUC 934: Fast Food Restaurant with and without Drive-Through Window

The proposed project has land use components that are represented by each of the above uses. Review of the TGM data shows there to be both strengths and weaknesses when considering use of these land use categories, as described below:

- LUC 945: Convenience Store/Gas Station – there are numerous sampled sites and both the number of vehicle fueling positions (VFP) and convenience store size is considered. This land use category is frequently used to estimate project trips.
- LUC 950: Truck Stop – Only 4 data points for AM peak hour, 7 for PM peak hour, and 2 for daily conditions are provided. The trip rate is expressed only as number of trucks generated per vehicle fueling position. The *TGM* issues a caution that the trip rates are quite high given amount of time required by a truck to fuel up. Additionally, it is unclear what other uses, besides truck fueling, were present at the sampled sites. This land use category is not often used to estimate project trips given this uncertainty and small sample size.
- LUC 416: Campground / RV Park – this land use category represents a traditional campground based on the dependent variable being the number of occupied campsites. The AM peak hour has 4 data points, PM peak hour has 5 data points, and there are no daily data points. This category is poorly suited to analyze the RV trip generation component of the proposed project.
- LUC 934: Fast Food Restaurant with and without Drive-Through Window – this land use has numerous data points and is used routinely in impact studies.

In addition to the above limitations, other questions pertain to the extent to which internal-trip making occurs between complementary land uses (e.g., visit fast-food restaurant after filling up vehicle). Additionally, other variables that could affect trip generation are not considered in the above categories, such as the amount of adjacent street truck traffic. Had the above ITE land use categories and trip rates been applied without any adjustments for internal trip making, the project would have generated approximately 530 auto trips and 60 truck trips during the PM peak hour.

The consulting firm of GHD collected traffic data at six different Love's Travel Stops situated in the California Central Valley and Southern California in November 2017. This was supplemented by an additional Love's Travel Stop in Williams, California surveyed by Fehr & Peers in June 2024. The details of this dataset are presented below.

Trip Generation Study at Love's Travel Stop in Williams, California

Fehr & Peers retained NDS to conduct a two-day count at the Love's Travel Stop located in Williams in Colusa County on Wednesday, June 26 and Thursday, June 27, 2024. This stop is situated at 100 Marguerite Street immediately south of SR 12 and less than one-half mile east of I-5. It consists of the following amenities:[12]

- 14 auto fueling positions
- 8 diesel truck fueling positions
- 15,000 sq. ft. convenience store featuring fast food restaurant with drive-through window, and various other specialty foods.

Table B-1 in **Appendix B** displays the data from each count day at the Williams site including the number of truck and auto trips generated during the AM and PM peak hours and from 6 AM to 8 PM. Footnotes in this table describe the peak hours of travel.

Overall, the busiest hour of travel was 2:30 – 3:30 PM with a total of 356 auto and trucks trips generated. This total is about 10% greater than the two-day average PM peak hour trip total of 323 trips. It is unlikely that 2:30 to 3:30 PM is the busiest overall hour of travel on surrounding roadways near the project site in Susanville. So, trips generated during the busiest 60 minutes of the typical peak hour of adjacent street traffic window, which occurs between 3 and 6 PM, were used to determine the Williams' site PM peak hour trip generation.

Table B-2 in **Appendix B** shows how the 6 AM to 8 PM trips generated by the Love's Travel Stop in Williams were extrapolated to obtain a 24-hour daily volume based on published data from the *TGM*. This approach is routinely used to estimate daily trips when cameras (versus less expensive hose tube counts) are necessary to collect data.

[12] Sources: Love's Travel Stops (loves.com) and measurement of building size using Google maps.

Trip Generation Studies at Six Love's Travel Stops in Central and Southern California

This study is summarized in a report entitled *Final Technical Paper: Love's Trip Generation and Travel Characteristic Study* (GHD, 2018). According to that report, each site was counted for a 3-day period on Tuesday, November 7, 2017 through Thursday, November 9, 2017. Fehr & Peers developed a database of these sites that includes project site attributes, project vicinity attributes, and vehicle trips generated at each site (see **Table 5**). Refer to Appendix B for that study.

Development of this database required review of aerial imagery (dating back to 2017). The Love's Travel Stop in Williams was added to the database to create a total of seven (7) counted sites whose travel characteristics will be analyzed to determine the proposed project's trip generation.

Table 5 shows the averages across the 7 sites. In terms of trip generation, they generate an average of 4,620 daily trips (49% trucks), 236 AM peak hour trips (51% trucks) and 274 PM peak hour trips (41% trucks).

When considering auto trips only, there is a substantial variation in trip rates when expressed in terms of auto trips per auto Vehicle Fueling Position (VFP):

- Daily: Average = 158 trips/VFP (Low = 91 trips/VFP and High = 251 trips/VFP)
- AM Peak Hour: Average = 7.7 trips/VFP (Low = 4.5 trips/VFP and High = 13.9 trips/VFP)
- PM Peak Hour: Average = 10.8 trips/VFP (Low = 6.0 trips/VFP and High = 16.2 trips/VFP)

Similarly, there is a substantial variation in truck trip rates when expressed in terms of truck trips per truck VFP, as evidenced by the following:

- Daily: Average = 281 trips/VFP (Low = 216 trips/VFP and High = 468 trips/VFP)
- AM Peak Hour: Average = 15.0 trips/VFP (Low = 11.2 trips/VFP and High = 23.0 trips/VFP)
- PM Peak Hour: Average = 13.9 trips/VFP (Low = 10.8 trips/VFP and High = 22.0 trips/VFP)

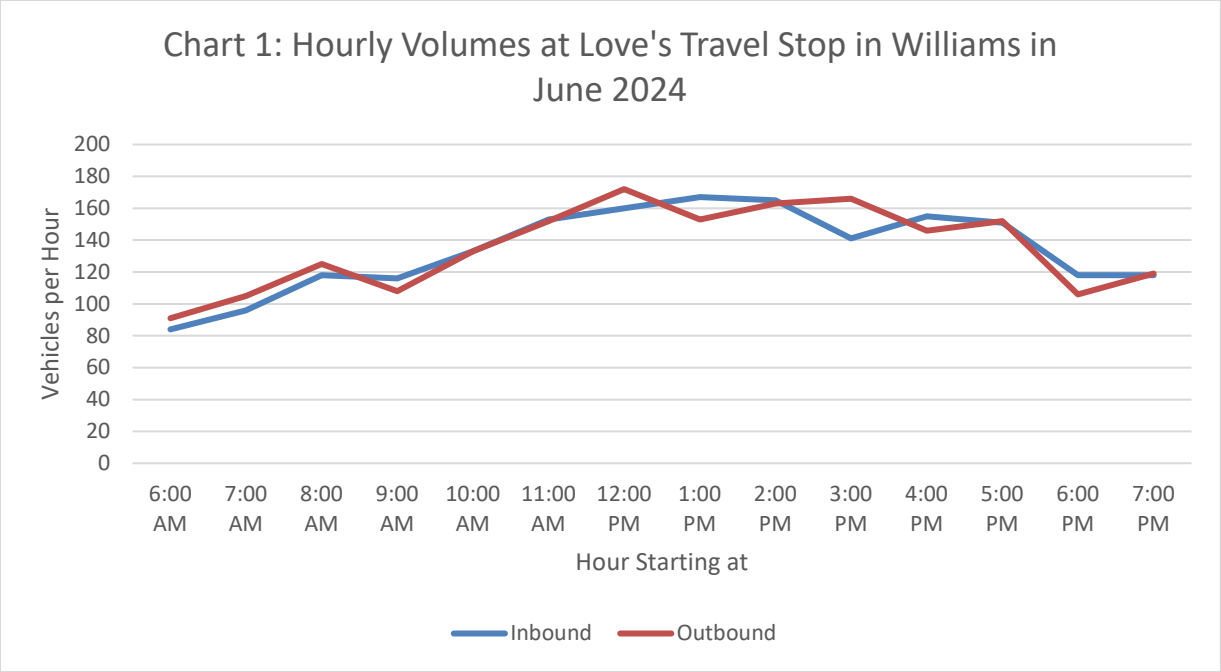
From this data, several trends are apparent:

1. *Vehicle fueling positions (VFP) is not the only site attribute variable affecting trip generation rates*. This is evidenced by the fact that truck trip rates per VFP are considerably higher than auto trips per VFP despite trucks taking much more time to fill up. As part of the site visit, truckers also use truck parking to take legally required breaks from driving. Those may or may not also involve fueling up, so it would be improper to only use VFP as the explanatory variable.
2. *Love's Travel Stops have dispersed time-of-day arrival and departure travel characteristics*. This is apparent from a comparison of AM and PM peak hour trip totals versus daily totals. **Chart 1** shows this graphically using the Williams site as an example.

Table 5: Love's Travel Stops in California Traffic Count Database

Love's Travel Stop Location	Main Highway / Cross Street	Project Site Attributes [1]					Project Vicinity Attributes				Vehicle Trips Generated					
											Auto Trips			Truck Trips		
		Building Size	Auto Fuel Positions	Truck Fuel Positions	Truck Parking Spaces	Drive -Thru Rest?	Daily [2] Autos on Adjacent Highways	Daily [2] Trucks on Adjacent Highways	#of [3] Adj. Truck Stops	# of Adj.[3] Quick Serve Rest.	Daily	AM Peak Hour	PM Peak Hour	Daily	AM Peak Hour	PM Peak Hour
Lodi	I-5 / SR 12	10,500	16	8	90	Yes	46,200	11,900	1	1	3,348	154	235	2,140	113	94
Santa Nella	I-5 / SR 33	9,900	12	8	85	Yes	20,300	8,800	1	3	1,096	54	72	2,069	112	105
Tulare	SR 99 / Paige Ave	10,400	16	9	105	Yes	43,300	13,700	0	0	4,017	223	245	2,894	160	148
Lost Hills	I-5 / SR 46	7,900	12	7	75	Yes	30,000	10,500	1	3	2,106	85	122	1,877	94	94
Barstow	I-15/ Lenwood Rd	9,400	16	10	90	No	44,100	13,900	3	1	1,536	80	112	2,222	112	121
Coachella	I-10 / Dillon Rd	7,300	16	6	52	Yes	18,400	10,800 [4]	1	2	1,885	93	123	2,807	138	132
Williams	I-5 / SR 20	15,000	14	8	88	Yes	22,100	6,900	0	0	2,623	123	227	1,726	109	86
Average		10,100	15	8	84	-	32,100	11,000	1	1	2,373	116	162	2,248	120	111

Notes:
[1] Sources: Love's Travel Stops (loves.com) and *Final Technical Paper: Love's Trip Generation and Travel Characteristic Study* (GHD, 2018)
[2] Based on 2016 for all sites except Williams site which was based on 2022 Caltrans data.
[3] Project vicinity attributes as of the date of the traffic data collection.
[4] Correction to GHD report to reflect correct AADT truck volume, plus also modest levels of truck traffic accessed from SR 86, which diverts from I-10 one-mile away.
Building size and ADT rounded to the nearest one hundred square feet or vehicles.
Source: Fehr & Peers, 2025.



Additionally, the relative amount of trips from each site that are trucks also varies considerably. Trucks were just 39% of all daily trips at the Lodi site, but 65% of trips at the Santa Nella site. On average, trucks represented 49% of all trips.

Statistical Analysis of Love's Travel Stops Traffic Count Database

Given the wide range of trip rates per VFP observed at the sampled sites, it is likely that multiple site attribute and project vicinity factors are affecting trip generation. To quantify the extent to which individual variables are correlated with trips generated, the coefficient of correlation was calculated for the various potential explanatory variables. The correlation coefficient measures the strength and direction of a relationship between two variables. A value of 1 indicates perfect positive correlation (i.e., as one variable increases, the other also increases), while a value of -1 indicates a perfect negative correlation (as one variable increases, the other decreases. A value of 0 indicates no correlation for relationship between the two variables.

Separate correlation coefficient calculations were conducted against truck and auto trips. Those results are shown in **Tables B-3** and **B-4** of **Appendix B**, respectively. Key findings of these tests are:

- The number of truck trips generated is most correlated (in a positive direction) to the amount of truck traffic on adjacent highways/freeways. The number of VFPs has little to no correlation with trips generated.

- The number of auto trips generated has a moderately positive correlation to the number of auto VFPs, presence of a drive-through lane at the on-site fast-food restaurant, auto traffic on the adjacent highway/freeway and convenience store building size. Auto trips generated is negatively correlated with the number of adjacent quick serve restaurants in the project vicinity.

Derivation of Trip Generation Equations for Proposed Project

Regression models estimate the value of an independent variable (in this case number of truck or auto trips generated) based on various explanatory variables (such as those described above). Provided they have a strong goodness of fit, regression models are an effective way to predict the value or outcome of a hypothetical project not included in the database provided its explanatory variable values are known.

Typically, a dataset of at least 30 observations or data points is desired when developing regression models. This allows for strong predictive power, use of multiple explanatory variables, and applicability over a wide range of inputs. Regression models are provided in the *Trip Generation Manual* for numerous land use categories, sometimes with as few as 4 or 5 data points. The models generally utilize a single explanatory variable, such as number of dwelling units, square feet, etc. and often have poor goodness of fit statistics.

A set of 6 different regression models were estimated using the Love's Travel Stop Traffic Count database. Separate equations were developed for truck trip generation and auto trip generation for AM peak hour, PM peak hour, and daily conditions. The results are shown in Tables B-3 and B-4.

The trip generation estimates require one more step involving a check to ensure that SR 36 has sufficient auto and truck trips to support the trip generation estimates. This is discussed in the following section.

Proposed Project Total Trips Generated

Table 6 presents the proposed project's gross number of vehicle trips generated, separated either as auto or truck trips. The detailed calculations are shown in **Appendix B.**

Table 6 indicates that the proposed project would generate about 1,200 daily trucks with about 70 occurring during the AM peak hour and 50 occurring during the PM peak hour. This is about 47% fewer daily truck trips than the average from the Love's Travel Stops dataset. This is to be expected because the proposed project would be situated adjacent to a highway that carries far fewer trucks when compared to the average from the dataset. And as was illustrated above, the best determinate for truck trip generation is the amount of adjacent street truck traffic.

Table 6:
Proposed Project Total Trips Generated

Land Use	Daily [3]			AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Love's Travel Stop – Truck Trips [1]	597	596	1,193	34	35	69	27	25	52
Love's Travel Stop – Auto Trips [1]	1,149	1,149	2,298	55	52	107	73	80	153
Fast-Food Restaurant without Drive-Through Lane [2]	360	361	721	40	29	69	27	26	53
Overnight RV Parking [3]	20	20	40	1	3	4	2	2	4
Total Trips	2,126	2,126	4,252	130	119	249	129	133	262

Notes:
1. Based on equations in Tables B-3 and B-4 in Appendix B. Traffic Count Database. Note that fast-food restaurant with drive-through window is reflected in these trips.
2. Based on rates published in the *Trip Generation Manual*, 11th Edition (Institute of Transportation Engineers, 2021). Majority of sites in Love's database consisted of a single on-site fast-food restaurant. Of the couple of sites that had two such restaurants, the second one was typically a smaller, off-brand establishment. Accordingly, it was deemed necessary to include this second fast-food restaurant separately in the trip generation estimate to ensure its trips are properly considered.
3. Fehr & Peers staff conducted counts at the Overnight RV lot at the Love's Travel Stop in Brigham Utah on July 25, 2024. According to the Love's website, 27 of 43 sites at that location were reserved as of 3 PM that day. During the 4:30 – 5:30 peak hour, there were 4 inbound trips and 3 outbound trips. 1 inbound trip was an RV with the remainder being cars (presumably maintenance, visitors, vehicles otherwise attached to the RV). Trip generation levels adjusted based on fewer RV spaces at project site. Of total RV Parking trips above, RVs represent 50% of daily trips, 2 of the 4 AM peak hour trips, and 1 of the 4 PM peak hour trips.

Source: Fehr & Peers, 2025.

Table 6 also shows that the proposed project would generate approximately 3,020 daily auto trips with 180 occurring in the AM peak hour and 210 occurring during the PM peak hour. These totals represent gross auto trips (excluding trucks and RVs) generated by the proposed project. The next section discusses how some trips to the site will be 'pass-by'.

Trucks would represent 28% of all vehicles entering the site on a daily basis.

Consideration of Pass-by Trips

A "pass-by" trip is defined as a trip already on the adjacent roadway that enters a commercial center en route to a different primary destination. Often, this is for the purpose of purchasing gas or food, or other short duration behaviors. Pass-by trips add traffic to the commercial center driveway, but do not add trips to the roadway itself.

ITE's *Trip Generation Manual* contains data for the following land use types: Fast Food Restaurant with Drive-Through Window (LUC 934) and Convenience Store/Gas Station (LUC 945). That data, though far from complete, is shown in **Table 7**.

Table 7: Potential Pass-by Trip Reductions for Proposed Project			
Land Use	**Pass-by Trip Percentage as a Function of All Trips Generated**		
	Daily	**AM Peak Period**	**PM Peak Period**
Fast Food Restaurant without Drive-Through Window (LUC 933) [1]	Not Shown	Not Shown	Not Shown
Fast Food Restaurant with Drive-Through Window (LUC 934) [1]	Not Shown	50%	55%
Convenience Store/Gas Station (LUC 945) [1]	Not Shown	76%	75%
GHD Survey at Six (6) Love's Travel Stops [2]	88%	Not Shown	

Notes:
1. Source: *Trip Generation Manual* (Institute of Transportation Engineers, 2021).
2. Source: *Final Technical Paper: Love's Trip Generation and Travel Characteristic Study* (GHD, 2018).

As part of the *Final Technical Paper: Love's Trip Generation and Travel Characteristic Study* (GHD, 2018), the results of in-person surveying of customers at the six (6) Love's Travel Stops were presented. A total of 600 customers at these locations were asked 8 questions pertaining to their travel to the site. When asked "if they exited the freeway to get to Love's Travel Stop", 88% responded that they had. About half of the sample consisted of truck drivers with the other half identifying as 'auto customers'. The report did not disclose whether pass-by rates were higher or lower for truckers or auto customers.

The 88% diversion value is technically a diverted-link trip at most sites in the database (because the truck needs to leave the freeway). Diverted-link trips are not possible at the project site because there is not a nearby freeway from which to divert. So, the 88% value is inferred to apply to travelers on adjacent SR 36 who 'pass-by' to the project en route to their ultimate destination. Further, it is likely that trucks will have a slightly higher pass-by rate than the 88% value, while auto customers will have a slightly lower value based on the differing nature of those trip types.

Applying a 90% pass-by percentage for daily truck trips implies that 540 of the 1,220 trucks on the roadway (44%) would enter the project site. Also applying a 90% pass-by percentage for AM and PM peak hour truck trips implies that about 56% of AM peak hour trucks and 47% of PM peak hour trucks would enter the site. Normally, the percentage of pass-by trips coming from the adjacent traffic stream should not exceed 10% to 20% of the total volume present. But truck stops are unique given the long-haul nature of their trips and mandatory rest breaks. Additionally, the lack of other nearby truck stops along SR 36 further increases the likelihood that trucks will stop at this location.

The pass-by percentages for the project's auto trips component corresponds to fewer than 10% of auto trips on SR 36 passing by the site.

Table 8 shows the total project trips, pass-by trip reductions applied, and the resulting number of new trips generated during the AM and PM peak hours and on a daily basis. As shown, the project would generate approximately 920 new vehicle trips, with 66 occurring during the AM peak hour and 63 occurring during the PM peak hour.

This table shows a net increase of 60 inbound and 60 outbound daily truck trips. It is expected that there would be some new truck trips by virtue of the following:

- Given that any vehicle that uses diesel fuel can fill up a Love's Travel Stop, it is likely that some local diesel trucks would use this facility. Those could be new trips originating from a nearby residence or business.
- It is conceivable that some trucks that currently use US Highway 395 to travel from Reno northerly into Modoc County and into Oregon may decide to temporarily leave that route to turn onto SR 36 for 2.5 miles to access the project site to fuel up or rest. This is considered a new trip because it is added to SR 36.

Project Trip Distribution

Pass-by trips are assigned separately for auto and truck trips, and generally in proportion to the existing directional traffic flows on SR 36 and Skyline Road. Table 3 indicates that there are more southbound trucks than northbound trucks on SR 36 during the PM peak hour. Accordingly, there are more pass-by truck trips turning right from southbound SR 36 than turning left from northbound SR 36. The distribution of pass-by auto trips also considered the directional volume, as well as the ease of performing the maneuver (e.g., pair of right-turns from southbound SR 36) is perceived to be easier than a pair of left-turns (from northbound SR 36).

About three-quarters of new trips are expected to be distributed to/from the north on SR 36 (toward Downtown Susanville). This is intuitive since most customers (who are not passing by) and people working at the site are anticipated to reside in Susanville given its larger population than nearby communities.

Traffic Forecasts

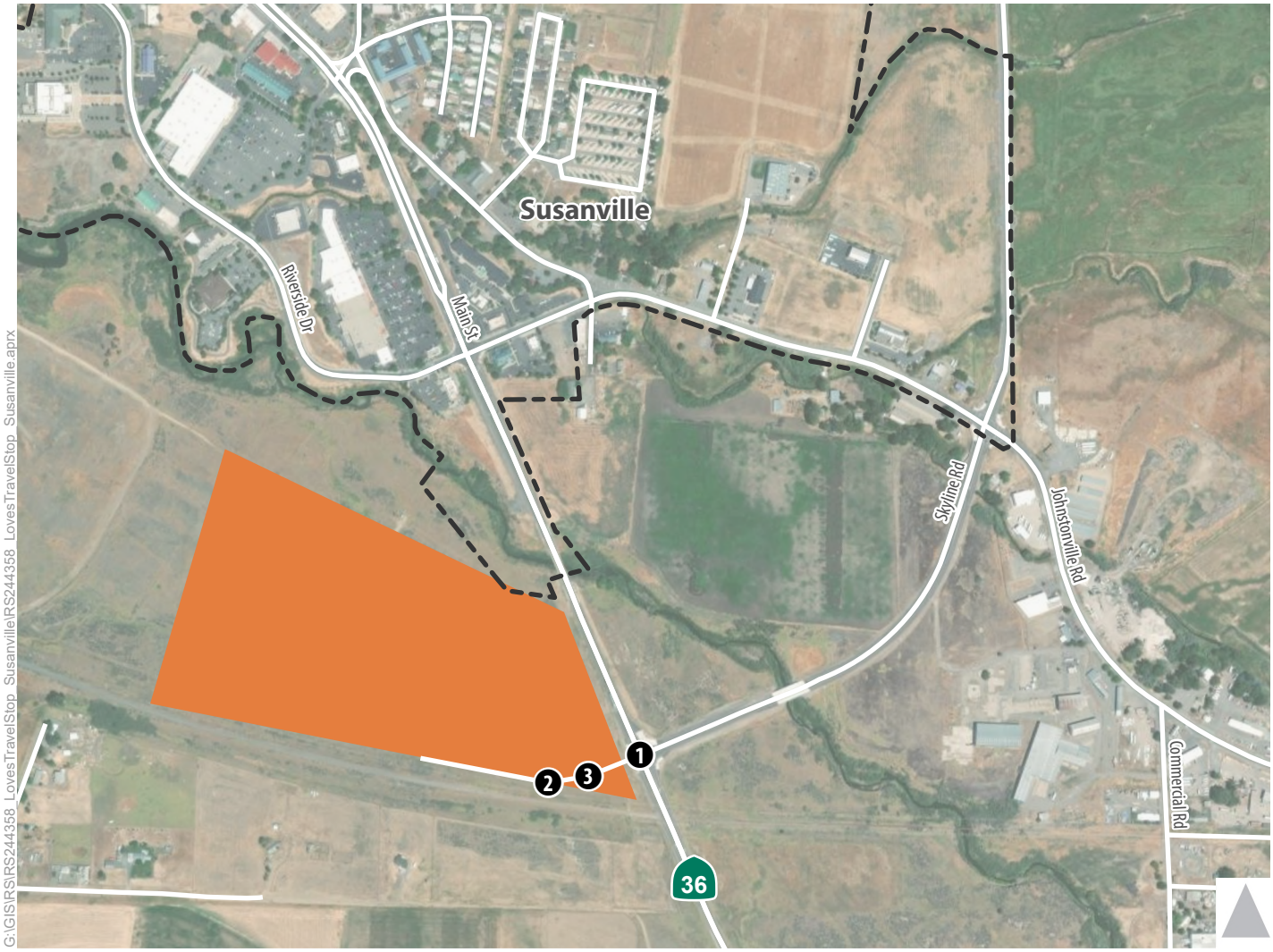
Project trips were assigned to the SR 36/Skyline Road study intersection and project driveways based on the expected trip generation, distribution, and assignment procedures described above. **Figure 6** shows the resulting existing plus project weekday AM and PM peak hour traffic volumes. **Table 9** displays the ADT on the roadways adjacent to the project site under existing plus project conditions. Data is broken down by passenger vehicles, trucks, and RVs.

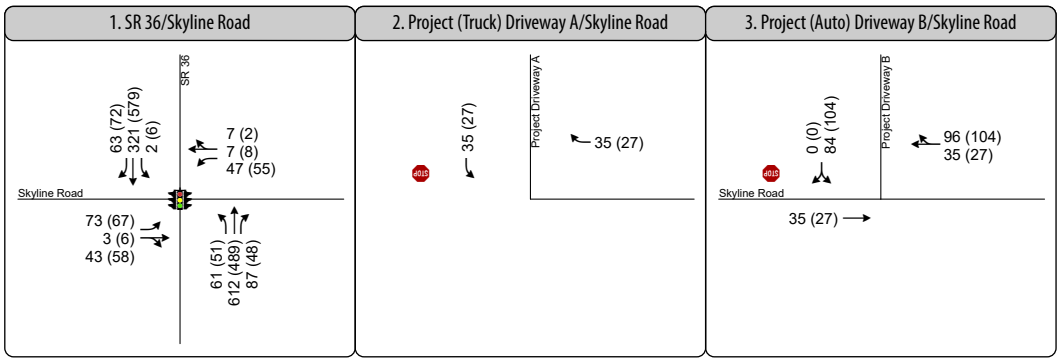
Table 8:
Proposed Project New Trip Generated

Land Use	Daily			AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Total Trips [1]									
Love's Travel Stop – Truck Trips	597	596	1,193	34	35	69	27	25	52
Love's Travel Stop – Auto Trips	1,149	1,149	2,298	55	52	107	73	80	153
Fast-Food Restaurant without Drive-Through Lane	360	361	721	40	29	69	27	26	53
Overnight RV Parking	20	20	40	1	3	4	2	2	4
Total	2,126	2,126	4,252	130	119	249	129	133	262
Reductions for Pass-by Trips [2]									
Love's Travel Stop – Truck Trips	-537	-536	-1,073	-31	-31	-62	-24	-23	-47
Love's Travel Stop – Auto Trips	-977	-977	-1,954	-47	-44	-91	-62	-68	-130
Fast-Food Restaurant without Drive-Through Lane	-144	-144	-288	-16	-12	-28	-11	-10	-21
Overnight RV Parking	-10	-10	-20	0	-2	-2	-1	0	-1
Total	-1,668	-1,667	-3,335	-94	-89	-183	-98	-101	-199
New Trips									
Love's Travel Stop – Truck Trips	60	60	120	3	4	7	3	2	5
Love's Travel Stop – Auto Trips	172	172	344	8	8	16	11	12	23
Fast-Food Restaurant without Drive-Through Lane	216	217	433	24	17	41	16	16	32
Overnight RV Parking	10	10	20	1	1	2	1	2	3
Total	458	459	917	36	30	66	31	32	63

Notes:
1. Source of total trips generated is Table 6.
2. Pass-by trip percentage estimates applied as follows: Travel stop truck trips: 90%, Travel stop auto trips: 85%, fast food restaurant without drive through window: 40%, and Overnight RV Parking: 50%.

Source: Fehr & Peers, 2025.





Turn Lane

AM (PM) Peak Hour Traffic Volume

Traffic Signal

Stop Sign

Study Intersection

Project Site

Susanville City Limit

Note: Lane Configurations at SR 36/Skyline Road have not been determined. One viable option is shown here.

Figure 6

Weekday AM and PM Traffic Volumes and Lane Configurations - Existing Plus Project Conditions

Table 9:
Daily Traffic Volumes on SR 36 and Skyline Road Adjacent to Project Site – Existing Plus Project Conditions

Segment	Segment	Existing Conditions				Project Trips				Existing Plus Project Conditions			
		Total Veh	Pass Veh	Trucks	RVs	Total Veh	Pass Veh	Trucks	RVs	Total Veh	Pass Veh	Trucks	RVs
SR 36	North of Skyline Road	14,000	12,838	1,120	42	660	582	68	10	14,660	13,420	1,188	52
	South of Skyline Road	15,300	14,034	1,220	46	176	114	52	10	15,476	14,148	1,272	56
Skyline Road	East of SR 36	1,800	1,696	100	4	81	81	0	0	1,881	1,777	100	4
Skyline Road [1]	West of SR 36	Does Not Exist				4,252	3,019	1,193	40	4,252	3,019	1,193	40

Notes:
1. This segment includes both new and pass-by project trips, which explains why project volumes are much higher on it than other segments.

Pass Veh = Passenger Vehicles. RVs = Recreational Vehicles.
Source: Fehr & Peers, 2025.

95th Percentile Queues at SR 36/Skyline Road Intersection – Existing Plus Project Conditions

The SimTraffic model, used to estimate the existing 95th percentile queue lengths, was also used to analyze existing plus project queuing conditions at the study intersection under geometric/signal phasing Alternatives 1 and 2. The model considered both the amount of traffic and percent that are trucks. Where crosswalks were added, modest levels of pedestrian activity were assumed. **Table 10** shows the existing plus project 95th percentile queue lengths for all turning movements at the study intersection under each alternative (refer to **Appendix C** for technical calculations). Key findings from this table include:

- Northbound and southbound through lanes would experience substantially longer queues. This is due to the change in signal timing resulting from a new leg to the intersection. Queues are somewhat longer under Alternative 1 (east-west split phasing).
- The applicant proposed 300-foot long northbound left-turn lane would have a (rounded) 95th percentile queue of 150 feet under either geometric alternative.
- The applicant proposed 250-foot long southbound right-turn lane would have a (rounded) 95th percentile queue of 175 feet under Alternative 1 and 150 feet under Alternative 2.

- The new eastbound approach to the intersection would have (rounded) 95th percentile queues of 150 feet or less under either geometric alternative. Queued traffic would not spill back to the closest driveway (Driveway B), which is 600 feet west of SR 36.

Table 10:
95th Percentile Vehicle Queues at the SR 36/Skyline Road Intersection – Existing Plus Project Conditions

Direction	Movement	Available Storage[2]	95th Percentile Queue[1]					
			Existing Conditions		Existing Plus Project Conditions [3]			
					Alternative 1 Geometrics and Signal Phasing		Alternative 2 Geometrics and Signal Phasing	
			AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Northbound	Left	n.a. / 300 feet	Does Not Exist		137	123	152	125
	Through	2.4 miles	165	134	278	231	265	209
	Right-Turn	500 feet	40	31	46	39	44	40
Southbound	Left-Turn	310 feet	12	23	11	64	7	17
	Through	2,100 feet	108	139	209	432	191	389
	Right	n.a. / 250 feet	Does Not Exist		76	176	72	150
Westbound	Left-Turn	275 feet	69	63	87	91	71	76
	Right-Turn	2,400 feet	17	8	14	7	44	39
Eastbound	Left-Turn	n.a. / 600 feet	Does Not Exist		136	122	146	115
	Right-Turn	n.a. / 600 feet	Does Not Exist		78	96	76	103

Notes:
1. 95th percentile queue based on output from SimTraffic model.
2. Storage measured based on aerial imagery using length of turn pocket or distance to upstream intersection for through movements. Length of proposed new travel lanes based on project's civil engineer drawings.
3. Alternative 1 is the split phase east-west phasing option, while Alternative 2 is the protected left-turn east-west phasing option.
n.a. = Not applicable as turn lane does not exist under given scenario.
Source: Fehr & Peers, 2025.

Readers should not construe the values shown in Table 10 to be the recommended amount of storage to be provided in the new turn lanes on SR 36 to be built by the project. Caltrans also requires deceleration to be provided at turn lanes on state highways. Coordination with Caltrans will be required to determine the required amount of vehicle storage and deceleration in these turn lanes.

VMT Considerations

Table 11 shows the number of new daily trips generated by all project travel components. (i.e., passenger vehicle fuel pumps, truck fuel pumps, truck parking, convenience market, fast-food restaurants, and overnight RV parking). Also shown is the estimated average length of these trips (refer to table footnotes for derivation of trip lengths). Finally, the VMT is shown, which is the product of daily trips and trip length.

Table 11:
Project-Related New Passenger Vehicle, Recreational Vehicle, and Truck VMT Generation

Vehicle Type	New Daily Trips [1]	Trip Length [2]	VMT [3]
Passenger Vehicles [4]	777	2.2 miles	1,709
Recreational Vehicles (RVs)	20	75 miles	1,500
Trucks [5]	120	2.4 miles [6]	288

Notes:
1. Source of new trips is Table 8.
2. Passenger vehicle trip length based on weighted average of the following likely trip origins/destinations: Downtown Susanville Area (75% of all new trips at 2 miles one-way, Skyline Road north toward Lassen Community College (10% of all trips at 3 miles one-way, and Johnstonville South (15% of all trips at 2.5 miles one-way). RV trip length based on half of trips originating/destined for Reno (84 miles one-way) and the other half originating/destined for the south entry/exit of Lassen National Park (67 miles).
3. VMT is the product of new daily trips and trip length.
4. Also includes SUVs, and light duty trucks.
5. Consists of medium- and heavy duty trucks.
6. Average one-way trip length of 2.4 miles assumed based on average travel distances to the site for local diesel trucks (2.2 miles) and trucks diverting off US Highway 395 (2.5 miles).

Source: Fehr & Peers, 2025.

Passenger vehicles and trucks that leave SR 36 to access the project site would also generate a small amount of VMT, which is shown in **Table 12**.

Table 12:
Project-Related Pass-by Passenger Vehicle, Recreational Vehicle, and Truck VMT Generation

Vehicle Type	Daily Pass-by Trips [1]	Pass-by Trip Length [2]	VMT [3]
Passenger Vehicles [4]	2,242	750 feet	318
Recreational Vehicles (RVs)	20	750 feet	3
Trucks [5]	1,073	1,250 feet	254

Notes:
1. Source of pass-by trips is Table 8. Note that these are one-way inbound or outbound trips.
2. Pass-by trip length estimated based on distance from SR 36 to auto and truck driveway (plus nominal travel within site).
3. VMT is the product of new daily trips and trip length.
4. Also includes SUVs, and light duty trucks.
5. Consists of medium- and heavy duty trucks.

Source: Fehr & Peers, 2025.

4. CUMULATIVE SETTING

This chapter begins by describing the cumulative setting, which considers reasonably foreseeable land developments and planned transportation improvements. Project effects under this scenario are then analyzed.

Land Use Growth

Forecast land use growth in Susanville and Lassen County is derived from several sources of information including historic growth as documented by the US Census, California Department of Finance (DoF) projections, and various planning documents. Each of these data sources and key findings from them on this topic are described below:

US Census Data

According to the US Census[13], the population of Susanville grew from 13,541 persons in the 2000 Census to 17,947 persons in the 2010 Census. It declined to 16,735 persons in the 2020 Census, as the US Census reported that year. As of the most recent available data (as of this report writing) of July 1, 2023, Susanville had a population of 12,689 persons, a 24% decrease from the population as reported in the 2020 Census.

According to the US Census OnTheMap webpage[14], there were approximately 5,422 jobs in Susanville in 2022. The most common jobs were public administration (44%), followed by health care and social services (15%), educational services (10%), retail trade (9%), and accommodation and food service (8%). According to the same website, there were 5,859 jobs in 2011, and 2,470 jobs in 2002. Note that 2022 is the most recent year for which this data is available.

Jobs that may have a trucking component (i.e., Agriculture, Forestry, Fishing and Hunting, Construction, Manufacturing, Wholesale Trade, Transportation and Warehousing, and Waste Management and Remediation) totaled 4.7% of all jobs with 256 jobs in those categories. In 2011, that total was only 2.2% of all jobs, with the vast majority of the increase being manufacturing jobs.

13 Source: U.S. Census Bureau QuickFacts: Susanville city, California. Accessed on April 7, 2025.

14 Source: OnTheMap (census.gov). Accessed on August 14, 2025.

Based on this data source, the following conclusions are drawn:

- The number of residents in the City of Susanville has been decreasing (24% decrease occurring from 2020 to 2023).
- The number of jobs located within the City Limits has been decreasing modestly (7% decrease from 2011 to 2022). In contrast, the number of jobs that may be affiliated with trucking has risen from 2.2% in 2011 to 4.7% in 2022, with most of the increase being manufacturing jobs.

California Department of Finance Projections

DoF projections are provided at the county-level and not made for individual cities. According to DoF projections[15], Lassen County had 27,483 residents in 2024. Total population in the county is expected to decrease to 23,819 persons in 2035, and 22,569 persons in 2045. This represents an 18% decrease in population between 2024 and 2045. As the City of Susanville currently represents 46% of the total population of Lassen County, it is likely that these county-wide decreases will also result in fewer residents in Susanville over time.

Caltrans

The Transportation Economics Branch of Caltrans assists local and regional agencies in their planning and travel forecasting efforts by preparing long-term socio-economic forecasts for each county in the state. [16] Between 2024 and 2045, Lassen County is expected to experience a 21% decrease in jobs. This decrease is aligned with the population decrease referenced above.

City of Susanville Draft General Plan.

The Land Use and Community Development Chapter of the proposed General Plan[17] update states the following with respect to land use growth in the area:

- *"The intent behind the expanded City boundary through a potential annexation is to capture fringe employment-based areas, specifically those which are industrially focused." The proposed growth area would allow the City to expand its tax base revenue and better regulate development along it's boundary."*

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15 Source: Projections | Department of Finance (ca.gov). Accessed on April 4, 2025.

16 Long-Term Socio-Economic Forecasts by County | Caltrans. Accessed on April 4, 2025.

17 Source: Index of /rooptown/wp-content/uploads/2023/06 (cityofsusanville.net). Accessed on August 5, 2024.

- *A future annexation of the industrial areas would also provide the City with land use control to determine future allowable uses that can ultimately benefit the community as well as properly mitigate such uses in the future."*

However, there are no draft land use proposals, prezoning, or related information available that would enable development of any projections of added traffic in the annexation areas. Note that the project site location is within City's Sphere of Influence.

SR 36 Complete Street and Safe Mobility Report

Page 18 of this report states the following with regard to future year traffic forecasts:

- *The population trend for Susanville and Lassen County has been going down over the past several years. The most significant factor for this plan is the potential decrease in projected traffic volumes due to decreased population. Rather than developing new traffic forecasts, the plan reviewed the traffic analysis from the 2019 CAPM project. The analysis states that forecasted traffic will not adversely affect LOS along the corridor.*

Planned Transportation Improvements

The Circulation Element Update to the City of Susanville General Plan describes several planned transportation system improvements. Most consist of street overlays to repair aging pavement. Other improvements include sidewalk repairs, high school safety improvements, and pedestrian safety improvements. The document also cites the *State Route 36 Complete Streets and Safe Mobility Plan,* which outlines the following priority "complete streets" improvement projects described below:

- Uptown Gateway & Urban Greening Project. This project focuses on revitalization of the Uptown by constructing a gateway feature and installing landscaping and irrigation. The project will improve aesthetics and enhance safety for pedestrians. These features have been shown to provide traffic calming as vehicle speeds tend to reduce when the surrounding environment has been developed to a pedestrian scale.
- Uptown Complete Street Lane Reallocation Project. This project would implement State Route 36 Complete Streets and Safe Mobility Plan's Lane reallocation improvements proposed in the Uptown District. Reducing the number of travel lanes from four to two will create room for left-turn lanes which currently do not exist. Reducing the number of lanes also reduces the number of conflict points between vehicles and pedestrians, enhancing safety for all users.

The *Lassen County Regional Transportation Plan* (2023) identifies the connection of the Skyline Road bike trail with the Bizz Johnson National Recreation Trail as a high priority project. The alignment shown in Figure 10 of that document shows this planned Class I trail extending along the Skyline Road extension near the project site.

Cumulative Vehicle Queuing and VMT Considerations

As documented earlier in this section, background traffic over the next 20 years is not expected to increase in the study area. Accordingly, an analysis of vehicle queuing of a cumulative plus project condition at the SR 36/Skyline Road intersection would not reveal greater queues than what is shown in Table 10. Thus, the cumulative conditions chapter does not present any such information.

In some instances, a proposed project's VMT could change between existing and cumulative conditions if new modes of travel become available, new land uses are built nearby, or other transportation system characteristics change. However, no such changes are expected in the study area. Therefore, the project VMT estimates shown in Tables 11 and 12 apply to both existing and cumulative conditions.

5. IMPACTS AND MITIGATION MEASURES

This chapter begins by presenting the thresholds of significance to be used to identify significant adverse transportation impacts. It then identifies the project-specific impacts of the proposed project based on those thresholds. Impact statements are provided for the topics of VMT and roadway safety/hazards, which are the criteria used to evaluate roadway system impacts. Impact statements are also provided for the bicycle, pedestrian, and transit systems, as well as emergency response.

Mitigation measures are recommended to lessen the significance of identified impacts. This chapter does not draw conclusions as to whether the mitigation measure would mitigate the impact to a less than significant level or whether the impact would remain significant after mitigation. Such conclusions are presented in the EIR based on the data provided here.

Thresholds of Significance

The following thresholds of significance are used to determine whether implementing the proposed project would result in a significant environmental impact. The thresholds are based on guidance from Appendix G of the CEQA Guidelines, and policies of the City of Susanville and other responsible agencies listed previously. The proposed project would cause a significant impact if it would:

Roadway Network

1. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) by substantially increasing VMT in the region.

Bicycle and Pedestrian Network

2. Conflict with adopted policies, plans, or programs regarding bicycle or pedestrian facilities.

Transit Services and Facilities

3. Disrupt existing or planned transit facilities or conflict with adopted policies, plans, or programs regarding transit facilities or services.

4. Create a demand for transit that is currently unmet.

Hazards

5. Cause the 95th percentile queue length in a left- or right-turn lane at a state highway intersection to exceed the available storage.
6. Substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses.

Emergency Vehicle Response

7. Adversely affect emergency vehicle response times.

Project-Specific Impacts and Mitigation Measures

Roadway Network VMT

Impact TR-1: Adverse VMT Impacts Caused by Project

Lassen County and the City of Susanville do not have established VMT thresholds or standards; as such, the guidance provided in the *Technical Advisory* was initially consulted in this analysis. The *Technical Advisory* generally recommends a 15% reduction from baseline VMT per capita or per employee for residential and office projects, respectively. For retail projects, the *Technical Advisory* recommends a threshold of no net increase in total VMT for the area or region. The *Technical Advisory* also acknowledges that "residential, office, and retail projects tend to have the greatest influence on VMT." The Project, however, is not a residential or office development. Similarly, while the project includes retail components, travel patterns and behaviors associated with travel stops are unique, as discussed in the Trip Generation section above. In such situations, the *Technical Advisory* recommends that lead agencies consider the purposes described in Public Resources Code section 21099, which, as discussed above, includes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Based on the guidance in the *Technical Advisory* and CEQA Guidelines section 15064.3, subdivision (b), and because the project does not fit within the residential, office, retail categories set forth in the *Technical Advisory*, the City has elected to assess the project's change in total VMT for trips by workers and visitors. The Susanville General Plan Circulation Element includes information on VMT per capita for home-based residential travel. However, it does not provide any information on VMT per employee or service population, so an apples-to-apples comparison of project generated visitor and worker VMT to citywide VMT averages from the Circulation element is not possible. Accordingly, as permitted by Guidelines section 15064.3, subdivision (b)(3), the City has elected to qualitatively analyze the project's potential VMT impacts.

The project is considered a VMT-efficient land use and would not substantially increase VMT in the region. As described in detail in the Trip Generation section, the vast majority (90% of trucks and 74% of passenger vehicles) of trips to the travel stop would already be on adjacent streets and then enter the site. On-site jobs would primarily be filled by Susanville residents, requiring a relatively short trip (less than three miles) to the site. There are other fast-food restaurants and gas stations less than one-half mile to the north and still others in downtown Susanville. The presence of these "intervening opportunity" facilities demonstrates that the project's gas station, convenience market, fast-food restaurants will not be a major generator of new trips and/or VMT. The overnight RV parking spots are anticipated to serve existing trips on their way to their final destination by providing customers with a temporary place to relax, refuel, and recharge. Many recreational destinations are situated in proximity to Susanville, but the City itself is not a major tourist destination. Accordingly, overnight RV guests is not anticipated to generate many mid-day local trips. Furthermore, the project applicant anticipates the average night per stay would be one night per visitor, meaning RVs are not arriving at the site for the primary purpose of extended stays in Susanville. Thus, the 20 new daily recreational vehicle trips would have a negligible effect on overall VMT generation in the City and the region.

The project site itself is also considered VMT-efficient based on data from the City's Circulation Element. The project site is situated in a Census Block Group (CBG) whose average home-based VMT per capita (i.e., person) is 11.2 miles. This is amongst the lowest VMT generation rates anywhere in the city (only one CBG has a lower value and that is 10.8 miles per capita), and far less than outlying areas in the northeast and northwest areas of the city, which generate VMT per capita in the 14 to 16 mile range. As stated above, an "apples-to-apples" numeric comparison of the project's VMT generation to the home-based VMT per capita metric used in the Circulation Element is not possible. As acknowledged in the *Technical Advisory*, however, "location within the region is the most important determinant of VMT" and siting development in "travel efficient locations" can be an effective means of reducing regional VMT. Accordingly, locating the project in a low VMT area of the City is likely to result in a similar level of VMT, provided that the project itself would not substantially increase VMT in the area.

The efficiency of this land use type can also be demonstrated by conducting a comparative VMT review against a reasonable alternative land use proposal. Because the Circulation Element only provides information on home-based VMT per capita, this analysis compares the project's VMT generation to VMT generated by a hypothetical residential development. While the site is not currently designated for residential use, the project proposes annexation of the site into the City with a General Commercial/Shopping Center land use designation and corresponding C-2 (General Commercial Shopping District) zoning, which permits residential development at up to 20.0 units per acre. If the approximate 14-acre site were to be developed at an average of 12 units per acre (i.e., a mix of single-family and multi-family), the yield would be 168 units. According to the US Census, average household size in Susanville is 2.5 persons per household, implying this hypothetical project could have 420 residents. Per the Circulation Element, each resident would generate 11.2 VMT, yielding a total of 4,704

VMT. The proposed project's total VMT generated (4,136 per Tables 11 and 12) is 12% less than the VMT of the hypothetical residential project, which itself is considered to be a VMT-efficient use.

Altogether based on the above, the proposed project is a VMT-efficient land use situated in a VMT-efficient area of the City and would not substantially increase VMT in the region. Accordingly, this impact is **less than significant,** and no mitigation is required.

Bicycle and Pedestrian Facilities

Impact TR-2: Conflicts with Adopted Policies, Plans, or Programs Regarding Bicycle or Pedestrian Facilities

The project would not eliminate or adversely affect an existing bikeway or pedestrian facility in a way that would discourage its use. The project would add a sidewalk along its frontage along Skyline Road and one or more crosswalks at the SR 36/Skyline Road intersection. The Skyline Road typical cross-section exhibit provided by the site civil engineer shows a 10-foot wide future Class I multi-use path located on the south side of Skyline Road. This facility will enable future construction of the westerly Skyline Road extension to the Bizz Johnson National Recreational Trail (at Richmond Road). Since the project would not conflict with adopted policies, plans, or programs regarding bicycle or pedestrian facilities, this impact is **less than significant**, and no mitigation is required.

Transit Services and Facilities

Impact TR-3: Inadequate Transit Service to Meet Demand

The project would not eliminate or adversely affect existing transit access as no service is currently provided in the immediate project vicinity. Transit service within the city is provided via both fixed-route and demand-based service. The nearest bus stop to the project site is located within the Safeway Shopping Center situated in the northwest quadrant of the SR 36/Riverside Drive intersection, which is about 2,000 feet north of the project site. As noted in the draft Circulation Element for the City of Susanville General Plan, the automobile is the primary mode of travel in the city. According to the 2020 US Census, 0.7% of Susanville residents used public transit to travel to work.[18] Given this, the fact that there are relatively few employees at the site, that there are demand-responsive transit services provided in the city (for certain groups) and that the proposed use is vehicle-centric, the impact associated with an unmet demand for transit is considered **less than significant,** and no mitigation is required.

[18] Susanville city, California - Census Bureau Profile

Roadway Safety / Design Standards:

Impact TR-4: State Highway Intersection Queuing

Table 10 indicates that under Existing Plus Project conditions, all 95th percentile vehicle queues at the SR 36/Skyline Road intersection would be less than the available storage (or planned storage for future lanes) during the AM and PM peak hours. Therefore, this impact would be **less than significant,** and no mitigation is required.

Impact TR-5: Increased Hazards

The project access (SR 36/Skyline Road) is a recently installed signalized intersection with a number of safety-related features, which were described in Chapter 2. The project would not introduce a new geometric design feature that is inherently unsafe. The project access intersection (SR 36/Skyline Road) does not have a collision history that could become exacerbated by the addition of project trips. For these reasons, this impact would be **less than significant,** and no mitigation is required.

Emergency Vehicle Response

Impact TR-6: Adversely Affect Emergency Vehicle Response Times

The Susanville Fire Station is located in Downtown Susanville, 1.7 miles to the north. The signal equipment at the SR 36/Skyline Road intersection includes emergency vehicle signal pre-emption equipment. The project would not cause undue delays that would adversely affect emergency vehicle response times. For these reasons, this impact would be **less than significant,** and no mitigation is required.

Cumulative Project Impacts and Mitigation Measures

Due to the lack of anticipated land use growth and increases in traffic levels in the study area and the absence of any major planned transportation impacts, cumulative project impacts and mitigations would be the same as project-specific impacts and mitigations.

Appendix A: Existing Conditions Technical Calculations

Prepared by National Data & Surveying Services

Note that these volumes were not used directly in the analysis. Refer to Chapter 2 for details.

SR 36 & Skyline Rd

Peak Hour Turning Movement Count

ID: 24-100012-001
City: Susanville

Day: Wednesday
Date: 5/29/2024

PEAK HOURS	COUNT PERIODS
07:30 AM - 08:30 AM	7:00 AM - 09:00 AM
NONE	NONE
05:00 PM - 06:00 PM	3:00 PM - 06:00 PM

CONTROL: Signalized

	AM	NOON	PM
TEV	820	0	872
PHF	0.95		0.96

SOUTHBOUND (SR 36)

	L	T	R	U	
AM	0	274	2	0	412
NOON	0	0	0	0	0
PM	0	393	6	0	362

WESTBOUND (Skyline Rd)

	L	T	R
PM	2	0	0
NOON	0	0	0
AM	60	0	51
	0	0	0
	57	0	83

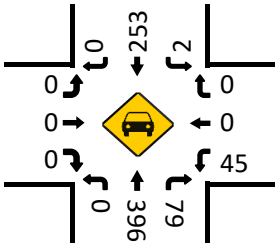
NORTHBOUND (SR 36)

	L	T	R	U	
PM	453	0	0	360	51
NOON	0	0	0	0	0
AM	325	0	0	412	81

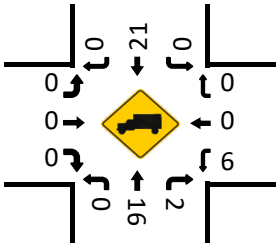
EASTBOUND (Skyline Rd)

	L	T	R
AM	0	0	0
NOON	0	0	0
PM	0	0	0
	0	0	0
	0	0	0

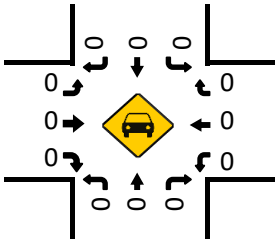
Cars (AM)



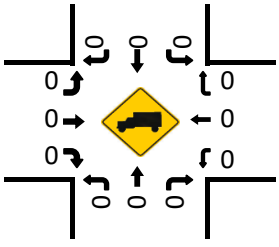
HT (AM)



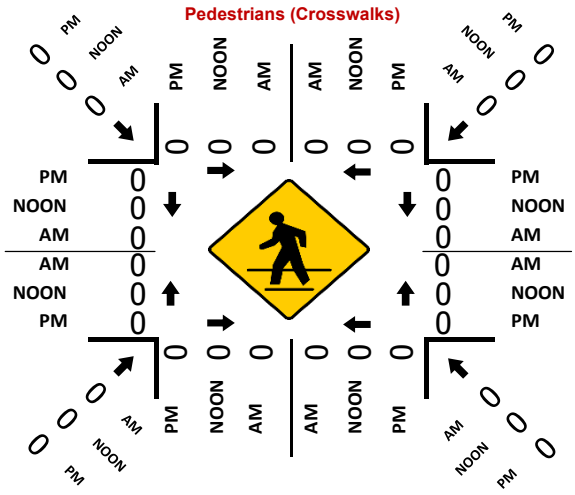
Cars (NOON)



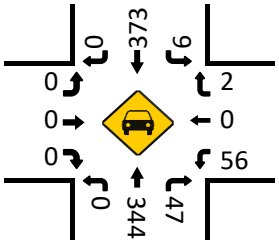
HT (NOON)



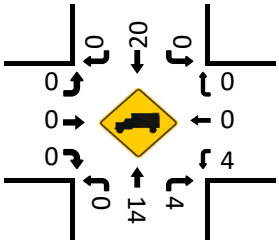
Pedestrians (Crosswalks)



Cars (PM)



HT (PM)



Intersection: 1: SR 36 & Skyline Road

Movement	WB	WB	NB	NB	SB	SB
Directions Served	L	R	T	R	L	T
Maximum Queue (ft)	88	21	193	49	25	147
Average Queue (ft)	30	4	77	14	2	44
95th Queue (ft)	69	17	165	40	12	108
Link Distance (ft)		2506	1647			1817
Upstream Blk Time (%)						
Queuing Penalty (veh)						
Storage Bay Dist (ft)	275			495	310	
Storage Blk Time (%)						
Queuing Penalty (veh)						

Network Summary

Network wide Queuing Penalty: 0

Intersection: 1: SR 36 & Skyline Road

Movement	WB	WB	NB	NB	SB	SB
Directions Served	L	R	T	R	L	T
Maximum Queue (ft)	75	18	164	43	32	166
Average Queue (ft)	30	1	62	8	5	68
95th Queue (ft)	63	8	134	31	23	139
Link Distance (ft)		2506	1647			1817
Upstream Blk Time (%)						
Queuing Penalty (veh)						
Storage Bay Dist (ft)	275			495	310	
Storage Blk Time (%)						
Queuing Penalty (veh)						

Network Summary

Network wide Queuing Penalty: 0

Appendix B: Trip Generation Technical Information

Trip Generation Estimates for Love's Travel Stop

INPUTS

# of Daily Trucks on Adjacent Highways	1220
# of Adjacent Truck Stops	0
# of Truck Fueling Positions	4
# of Auto Fueling Positions	12
Auto ADT on Adj Hwy / 1,000	14.08
# of Adj. Quick Serve Rest	0
Fast-Food Drive-Through Lane Present	1

OUTPUTS

Number of AM Peak Hour Truck Trips =	69
Number of PM Peak Hour Truck Trips =	52
Number of Daily Truck Trips =	1193
Number of AM Peak Hour Auto Trips =	107
Number of PM Peak Hour Auto Trips =	153
Number of Daily Auto Trips =	2298

EQUATIONS

TRUCKS

AM Peak Hour:

Number of AM Peak Hour Truck Trips = 60.4 + 0.0069 (Number of Daily Trucks on Adjacent Highways) -15.74 (# of Adjacent Truck Stops)

PM Peak Hour:

Number of PM Peak Hour Truck Trips = 44.1 + + 0.0061(# of Daily Trucks on Adjacent Highways)

Daily:

Number of Daily Truck Trips = 1059 + 0.11(# of Daily Trucks on Adjacent Highways)

PASSENGER VEHICLES

AM Peak Hour:

Number of AM Peak Hour Auto Trips = -72.04 + 4.116(# of Auto Fueling Positions) + 2.465(Auto ADT on Adj Hwy / 1,000) - 22.512(# of Adj. Quick Serve Rest) + 94.746(Fast-Food Drive-Through Lane Present, 1 or 0)

PM Peak Hour:

Number of PM Peak Hour Auto Trips = -7.14 + 1.479(# of Auto Fueling Positions) + 2.333(Auto ADT on Adj Hwy / 1,000) - 35.347(# of Adj. Quick Serve Rest) + 109.309(Fast-Food Drive-Through Lane Present, 1 or 0)

Daily:

Number of Daily Auto Trips = -367.39 +52.625(Auto ADT on Adj Hwy / 1,000) – 417.374(# of Adj. Quick Serve Rest) + 1924.569(Fast-Food Drive-Through Lane Present, 1 or 0)

Table B-1: Love's Travel Stop in Williams Trip Generation Data																								
Land Use	6 AM – 8 PM								AM Peak Hour [1]								PM Peak Hour [2]							
	Autos				Trucks				Autos				Trucks				Autos				Trucks			
	Day 1		Day 2		Day 1		Day 2		Day 1		Day 2		Day 1		Day 2		Day 1		Day 2		Day 1		Day 2	
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Love's in Williams	1,118	1,108	1,265	1,256	604	625	610	635	49	51	78	67	52	63	42	61	112	107	114	121	43	40	51	37

Notes:
[1] On Day 1, AM peak hour occurred from 8 to 9 AM. On Day 2, AM peak hour occurred from 7:45 -8:45 AM.
[2] On Day 1, PM peak hour occurred from 3 to 4 PM. On Day 2, PM peak hour occurred from 4:15 – 5:15 PM.
Day 1 was Wednesday, June 26, 2024. Day 2 was Thursday, June 27, 2024.
Source: Fehr & Peers, 2024.

Table B-2: Love's Travel Stop in Williams Extrapolated Average Daily Trip Generation																				
Land Use	6 AM – 8 PM								Daily								Averaged Daily			
	Autos				Trucks				Autos				Trucks [1]				Autos		Trucks	
	Day 1		Day 2		Day 1		Day 2		Day 1		Day 2		Day 1		Day 2					
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Love's in Williams	1,118	1,108	1,265	1,256	604	625	610	635	1,235	1,224	1,398	1,388	842	872	851	886	1,317	1,306	847	879

Notes:
[1] 6 AM to 8 PM is 71.7% of daily traffic for truck stops according to the ITE *Trip Generation Manual*. Extrapolation to daily conditions based on this value.
[2] 6 AM to 8 PM is 96% of daily traffic for fast food restaurants with a drive through window and 85% for convenience market with gas station according to the ITE *Trip Generation Manual*. Extrapolation to daily conditions based on the average of those percentages.
Day 1 was Wednesday, June 26, 2024. Day 2 was Thursday, June 27, 2024.
Source: Fehr & Peers, 2024.

Table B-3: Correlation of Variables and Regression Model Equations based Love's Truck Stop Traffic Count Database – Truck Trips						
Metric	**Coefficient of Correlation between Truck Trips Generated and Project Site Truck Attributes [1]**				**Regression Models**	**R-Squared Value [3]**
	AM (PM) [Daily]					
	Truck [2] Fuel Positions	**Truck Parking Spaces**	**Daily Trucks [2] on Adjacent Highways**	**#of Adj. Truck Stops**		
Truck Trip Component of Love's Traffic Count Database	0.08 (0.18) [-.04]	0.16 (0.05) [-0.09]	0.45 (0.67) [0.62]	-0.34 (0.06) [-0.07]	AM Peak Hour: Number of Truck Trips = 60.4 + 0.0069 (Number of Daily Trucks on Adjacent Highways) -15.74 (# of Adjacent Truck Stops)	0.60
					PM Peak Hour: Number of Truck Trips = 44.1 + + 0.0061(# of Daily Trucks on Adjacent Highways)	0.45
					Daily: Number of Daily Truck Trips = 1059 + 0.11(# of Daily Trucks on Adjacent Highways)	0.38

Notes:

[1] Refer to previous page for description of correlation coefficient.

[2] The number of truck fueling positions showed moderately strong positive correlation (about 0.48) with daily trucks on adjacent highways under all scenarios. This would seem to be expected as it is likely that the number of trucks on the adjacent roadway was considered when d deciding upon whhow many truck CFPs to provide.

[3] The R^2 value is a goodness-of-fit measure of the model's ability to predict the actual independent variable values. High R^2 values indicate a strong goodness of fit and vice versa.

Source: Fehr & Peers, 2025.

Table B-4: Correlation of Variables and Regression Model Equations based Love's Travel Stops Traffic Count Database – Auto Trips								
Metric	**Coefficient of Correlation between Auto Trips Generated and Project Site Truck Attributes**					**Regression Models**	**Model Accuracy [1]**	
	AM (PM)[Daily]							
	Auto Fuel Positions	**Restaurant Have Drive-Through?**	**Daily Autos on Adjacent Highways**	**Building Size**	**#of Adj. Quick Serve Rest**		**R^2**	**Other**
Auto Trip Component of Love's Traffic Count Database	0.55 (0.49) [0.48]	0.28 (0.31) [0.36]	0.56 (0.46) [0.55]	0.29 (0.59) [0.32]	-0.74 (-0.83) [-0.70]	<u>AM Peak Hour:</u> Number of AM Peak Hour Auto Trips = -72.04 + 4.116(# of Auto Fueling Positions) + 2.465(Auto ADT on Adj Hwy / 1,000) - 22.512(# of Adj. Quick Serve Rest) + 94.746(Fast-Food Drive-Through Lane Present, 1 or 0)	0.92	5 of 7 observations have predicted values within 9% of actual. The remaining two are each within 14%
						<u>PM Peak Hour:</u> Number of PM Peak Hour Auto Trips = -7.14 + 1.479(# of Auto Fueling Positions) + 2.333(Auto ADT on Adj Hwy / 1,000) - 35.347(# of Adj. Quick Serve Rest) + 109.309(Fast-Food Drive-Through Lane Present, 1 or 0)	0.97	5 of 7 observations have predicted values within 5% of actuals. The remaining two are within 14% and 21%.
						<u>Daily:</u> Number of Daily Auto Trips = -367.39 +52.625(Auto ADT on Adj Hwy / 1,000) – 417.374(# of Adj. Quick Serve Rest) + 1924.569(Fast-Food Drive-Through Lane Present, 1 or 0)	0.96	4 of 7 observations have predicted values within 6% of actuals. The remaining three are within 12%, 12%, and 20%.

Notes:

[1] Because this derivation of the auto trips models necessarily involves the use of more explanatory variables than the truck trips models, the resulting R values should be viewed with some caution because they are a function of the 'degrees of freedom' which is reduced as more variables are added. The Adjusted R-squared value, which takes this into effect, shows values ranging from 0.75 to 0.92.

Source: Fehr & Peers, 2024.

FINAL Technical Paper:

Love's Trip Generation and Travel Characteristic Study

Prepared for:

Love's Travel Stops & Country Stores

Prepared by:

omni · means
A GHD Company

GHD

Love's Trip Generation and Travel Characteristics Study

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June 2018

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Vehicle and Truck Trip Survey (Questionnaire)
Vehicle and Truck Trip Survey Summary Results by Location
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Introduction

Transportation planning and traffic engineering rely on trip generation analysis to estimate the number of vehicle trips that will be generated from a proposed development. Planners and engineers can then analyze a project's impact on traffic congestion and air quality, particularly in California. However, existing methods utilized to determine actual traffic impacts at truck stops are not consistent with current conditions occurring at these multi-purpose facilities.

With past limited and applicable trip generation data, studies available for truck stops do not include the array of services provided in modern travel stops. Traffic consultants and others have turned to combining available trip generation studies, largely available from the Institute of Transportation Engineers (ITE), to estimate proposed truck stop trip generation to identify potential traffic impacts and vehicle miles travelled (VMT[1]) based upon trip generation.

These often include many assumptions to account for pass-by trips, diverted-link trips and internal capture rates to develop reasonable trip generation. This approach can potentially over-predict trip generation as there are many multi-purpose benefits from this land use, including:

- Fuel sales;
- Retail purchases;
- Restaurants (fast-food and sit-down);
- Restrooms;
- Rest areas;
- Parking;
- Scales;
- Tire care center;
- Laundry facilities;
- ATMs; and,
- Other truck stop uses dependent upon region.

Due do the uncertainty of industry standard assumptions, local and state reviewing agencies often scrutinize these assumptions as a result of limited documentation. When assumed discounts need to be applied to trip generation rates for stand-alone commercial uses, it is difficult to determine actual trip generation rates of these land uses.

Additionally, it is difficult to provide a generic truck stop description as a result of the commercial uses that can be assembled in any given truck stop. In an effort to collect additional data and further research trip generation characteristics of Love's Travel Stops & Country Store sites in California, data for several additional sites in the same retail chain were collected in different geographical areas of the state and the design of the in-field survey questionnaire was in draft form.

[1] VMT is calculated by multiplying daily traffic on a roadway segment by the length of the segment.

With the potential for such over prediction of trip generation from truck stops, the ramifications are potentially significant. Therefore, the need for accurate, representative and transportation industry recognized trip generation rates and travel characterizations is imperative.

VMT is a critical component of this study. With passage of SB 743 in California, a new process changes the way that transportation impacts are analyzed under the California Environmental Quality Act (CEQA). Specifically, SB 743 requires the Office of Planning & Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Specifically, assessment of VMT, thresholds of significance and mitigation measures will be used to address transportation impacts. In summary, it was determined by the legislature that VMT is the most appropriate measure for transportation impacts.

This Technical Paper provides data to assist in documentation of actual VMT based upon diverted link distance between the origin and destination of the trip end. Today, VMT is calculated based on land use or use of technical travel demand forecast models; however, based upon the results of this study, VMT should only be calculated based upon diverted trip distance rather than overall trip potential, thereby providing a more accurate representation of VMT. This calculation is further discussed in the Conclusions & Recommendations section of this Technical Paper.

As a result, Love's Travel Stops and Country Stores has embarked on an undertaking to determine actual trip generation characteristics at six (6) locations throughout California. Therefore, the objective of this research study related to trip generation characteristics of Love's Travel Stops in California with the intention to determine if trip generation characteristics of these facilities differs from those contained in the *Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition.* Importance with following ITE's established guidelines of conducting information report study are provided below.

ITE Guidance

Per ITE standard guidelines, an ITE information report study should include the following components:

- Phase 1 – Design Industry Recognized (ITE) Trip Generation and Travel Characterization Methodology;
- Phase 2 – Conduct In-Field Surveys Consistent with the Prescribed Methodology Developed in Phase 1;
- Phase 3 – Prepare a Technical Paper on the Analysis of In-Field Surveys, Summarizing Findings, Conclusions & Recommendations; and,
- Phase 4 – Publish the Research Study and Share at Industry Conferences *(To Be Determined)*.

As a result, the following sections were prepared.

Phase 1 - Design Industry Recognized Trip Generation and Travel Characterization Methodology

Current Methodology

Today's standard practices used to develop trip generation rates for truck stops is derived from the *Trip Generation Manual*, published by ITE. Many versions have been published with the most

recent being the *10th Edition*. ITE Land Use 950: Truck Stop description is as follows:

> *A truck stop facility is a facility located on or near major roadways and provides refueling, food, and other services to motorists and truck drivers. These facilities typically contain convenience stores, showers, restaurants and on-site truck parking spaces. Gasoline/service station (Land Use 944) and gasoline/service station with convenience market (Land Use 945) are related uses.*

Trip generation rates for this Land Use 950 were developed from eight studies surveyed in the 2000s and 2010s in Colorado, Florida, Tennessee, Vermont and Virginia. Trip generation rates were calculated for 1,000 sq. ft. gross floor area on a weekday with peak hour of adjacent street traffic, one hour between 4:00 and 6:00 p.m. However, this data does not include all of the amenities of modern travel stops (discussed below) and certain attributes of the data collected for Land Use 950, e.g., vehicle fueling positions, contain a small sample size. As a result, transportation professionals have sought solutions outside of solely utilizing Land Use 950.

Alternatives include development of trip generation from other land uses provided in the ITE Manual, specifically Land Uses 853, 944 and 945. Table 1 summarizes *ITE Trip Generation (10th Edition)* Land Uses 853, 944, 945 and 950 and provides a brief description of the primary activity of business and weekday trip generation average rates per vehicle fueling position and per 1,000 square feet of floor area. Table 1 further identifies average trip generation rate by time of day for peak hour of adjacent street, i.e., AM peak hour of generator (between 7:00 to 9:00 a.m.) and PM peak hour of generator (between 4:00 and 6:00 p.m.). The average weekday trip rate (the weighted average of the number of vehicle trips or trip ends per unit of independent variable) is shown in Table 1.

TABLE 1
ITE TRIP GENERATION, 10TH EDITION, VOLUME 3

			Weekday Trip Generation Average Rates			
			Trips per Vehicle Fueling Position		Trips per 1,000 Sq. Ft. Gross Floor Area	
Land Use Title	ITE Land Use Code	Primary Business Activity	AM Peak Hour of Adj. Street	PM Peak Hour of Adj. Street	AM Peak Hour of Adj. Street	PM Peak Hour of Adj. Street
Convenience Market w/ Gasoline Pumps	853	Selling of Convenience Items	16.57	19.07	40.92	50.92
Gasoline Service Station	944	Fueling of Motor Vehicles	12.16	13.87	N/A	N/A
Gasoline Service Station w/ Convenience Market	945	Fueling of Motor Vehicles	10.16	13.51	82.13	97.47
Truck Stop	950	Refueling, Food and Other Services	7.18[1]	8.41[1]	26.49	22.73

Table 1 demonstrates a noticeable difference between trip generation rates of Land Use Code (LUC) 853, where the primary business activity is selling convenience items, and LUCs 944 and 945, where fuel sales are the primary business activity. LUC 950, which provides fuel sales, food and other services, also demonstrates differences in trip generation rates [with its minor sample size]. Based upon data provided in *ITE Trip Generation*, LUC 853 generates more trips per vehicle fueling position (VFP) during both AM and PM peak periods, but much fewer trips than LUC 945 per gross floor area (GFA). LUC 950 has the lowest trip generation rates per GFA.

[1] *Small sample size (1 survey)*

These observations show that the independent variable associated with the primary business activity VFP and GFA play an important role in determining the trip generation rate. Table 1 also demonstrates that PM peak hour rates generate more traffic than the AM peak hour rate based upon adjacent street demand.

The physical type of fast food restaurant is also a factor in user (customer) choice. Drive-thru vs. walk-up or sit down establishments attract different types of clientele. Some travel stops provide either both or have one or the other [with or without drive-thru]. Additionally, the brand name of restaurant is critical to on-site sales based upon discussions with regional managers. Regional influences for popular restaurants, be they fast food or sit down, vary for any given truck stop. As a result, this variable may constitute development of a special trip generation rate, e.g., convenience market with fast food restaurant (with and without drive-thru) and with gasoline pumps.

Following use of these common high trip generating land uses, it is shared practice to apply trip reductions for pass-by trips, diverted-link trips, internal capture rates and other trip reduction strategies identified in the ITE *Trip Generation Handbook*. As a result, additional variables and assumptions (trip reduction rates) are applied to the LUC, thus creating differing trip generation rates at varying locations and jurisdictions.

However, these land uses are not compatible to specific modern travel stops developed in recent years. For example, the land uses identified above [944, 945 & 950] do not encompass the variety of services provided at the modern Love's Travel Stops & Country Stores.

The description of a Love's Travel Stops & Country Stores is as follows:

> *Truck stop and travel center facilities that provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel fuel, CNG, travel items, electronics, snacks, light grocery items and more, as well as a wide variety of restaurant (both drive-through and walk up) offerings. ATMs, CAT scales, truck parking, private showers, laundry services, RV dump service, WiFi and other amenities are also offered at select locations. Love's Truck Tire Care offers heavy duty tire care, including TirePass, light mechanical services and roadside assistance. Love's Hospitality offers hotels and storage rental locations.*

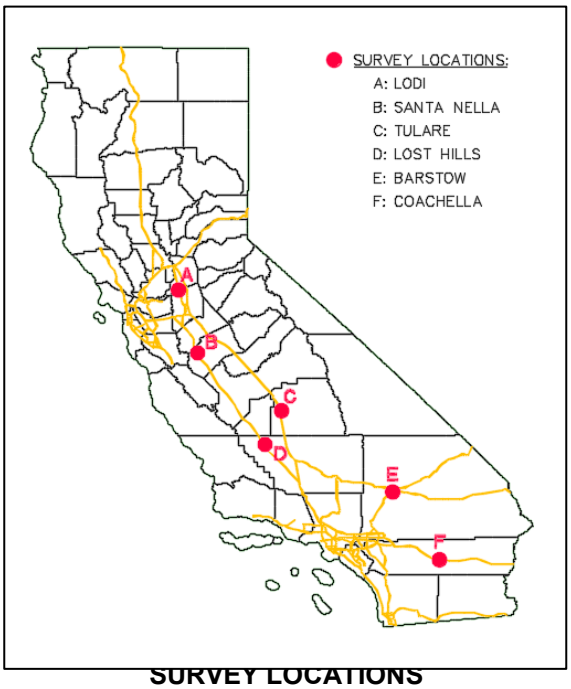
As described above, today's modern travel stops and/or travel centers offer many more services for the travelling public and professional truck drivers that use major road facilities (freeways, highways, etc.). The intention of Love's Travel Stops & Country Stores is to facilitate drivers that are on the roadway system and need to stop for services. As such, the trips that use a Love's facility are not intended to be primary trips. With the exception of home-work trips for employees, the trip types are generally pass-by or diverted-link.

The above land use description suggests that the Love's Travel Stops & Country Store sites have different trip generation characteristics from the study sites included in ITE LUCs 853, 944, 945 and 950, and may need to be classified under a new land use code in *Trip Generation*, or combined with one or more land use types to reflect today's modern travel stops as designed by Love's. In general, the trend of modern travel stops may not be just a characteristic of future Love's, but could be applicable to future modern truck stops proposed by others.

Phase 2 – Data Collection

Survey Sites

The survey sites included in this study were chosen in varying geographic regions in the State of California. Six (6) Love's Travel Stops & Country Stores were selected of nine (9) total locations serving California. Figure 1 below identifies the Love's Travel Stops in their geographic area. Table 2 describes existing sites configurations, including square footage, fueling positions (auto/truck), primary restaurant, tire shop facility and highways/cross streets. Additionally, Figure 2 identifies each Love's Travel Stops study locations (Google aerial image), adjacent street and project driveway operations (access points) that were evaluated.



SURVEY LOCATIONS

In order to determine the days and times of the in-person travel survey, it was first necessary to define peak periods of usage at the individual locations. Therefore, weekday daily traffic counts were conducted along the primary street/road accessing the Love's facility to understand adjacent street traffic in relation to driveway volumes.

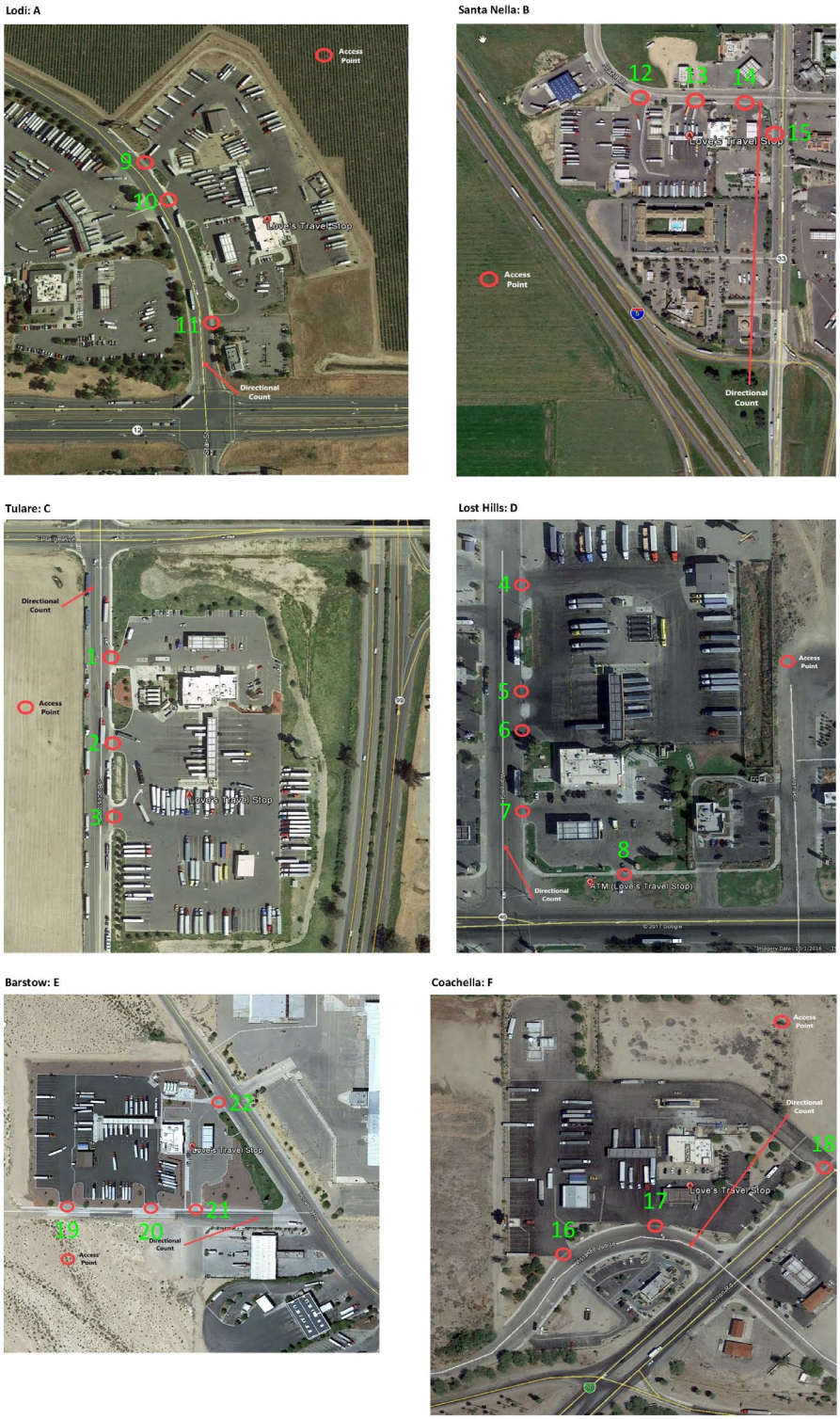
Based upon the peak day and time period of the daily traffic counts, peak period driveway volumes (recorded on video) were observed and documented. Additionally, the peak period times were selected to conduct in-person travel surveys the following week, which generally occurred in the early afternoon. This provided a reasonable time period to collect necessary data.

TABLE 2
LOVE'S TRAVEL STOPS FEATURES

	Love's Locations (CA)	Store #	Approximate Building Size	Auto Fueling Positions	Truck Fueling Positions	Restaurant	Tire Care	Adjacent Highway	Intersecting Local Road
A	**Lodi**	538	10,500 SF	16	8	Arby's	Yes	I-5	SR-12
B	**Santa Nella**	441	9,900 SF	12	8	Del Taco	Yes	I-5	SR-33
C	**Tulare**	382	10,400 SF	16	9	McDonald's, Subway	Yes	SR-99	Paige Avenue
D	**Lost Hills**	230	7,900 SF	12	7	Arby's	Yes	I-5	SR-46
E	**Barstow**	374	9,400 SF	16	10	Chester's, Godfathers, Love's Subs (no drive-thru's)	Yes	I-15	Lenwood Road
F	**Coachella**	207	7,300 SF	12	6	Carl's Jr.	Yes	I-10	Dillon Road

Notes: SF = Sq. Ft.

FIGURE 2: LOVE'S TRAVEL STOPS GOOGLE AERIAL PHOTO SURVEY LOCATIONS



Under this phase, Omni-Means/GHD and Project Team, consisting of Love's representatives and Lane Engineers, Inc., developed the in-field survey questionnaires.

In-Field Survey Questionnaires

Under this task the Project Team, with collaboration with Metro Traffic Data, Inc., prepared a list of questions and coordinated to schedule in-person surveys. The survey was modified as necessary based upon correspondence with the Project Team. A site visit was conducted by Omni-Means/GHD and Lane Engineers, Inc., to document in-field survey techniques and finalize in-person survey questions. The following is the final list of questions for the in-field survey:

Survey Questionnaire

1. ***Where did you begin your trip?***
2. ***Where will you end your trip?***
3. ***Are you a trucker or an auto costumer?***
4. ***Is this your only stop on your trip today?***
5. ***Did you exit the freeway to get to Love's Travel Stop?***
6. ***What are the PRIMARY and SECONDARY purpose(s) for stopping at Love's Travel Stop? (Two Part Question)***
    a. ***Gasoline or Diesel***
    b. ***Convenience Store***
    c. ***Restaurant***
    d. ***Restroom***
    e. ***Tire Care Center (Truckers Only)***
    f. ***Other***
7. ***If you did not stop here, would you have stopped at another nearby location on your trip for purposes identified in Questions #6.***
8. ***What do you like best about Love's Travel Stop***
    a. ***Fuel Prices***
    b. ***Food***
    c. ***Ease of Access***
    d. ***Variety of Services/Convenience***
    e. ***My Love Rewards***



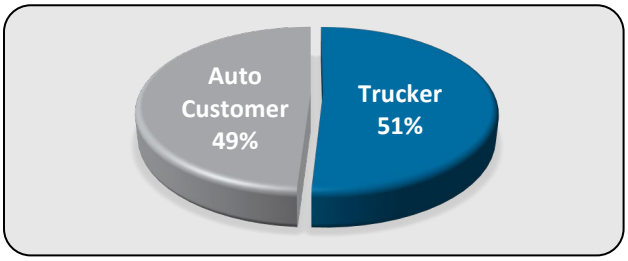
An advantage to in-field surveys is that the research produces data based on real-world observations (empirical data). In order to substantiate the data collected the sample size was a factor that the Project Team focused on. Therefore, a minimum of 100 samples were collected at each site. As an incentive to the patrons participating in the in-field survey, the Project Team offered a $5 Love's Travel Stop gift card. As the number of sample size validates the in-field survey, the time that the in-field survey is completed is also is a factor. In terms of capturing the peak operations of the facility, the surveys were generally conducted during the peak hour of driveway operations.



Photo taken at the Love's Truck Stop (Tulare location).

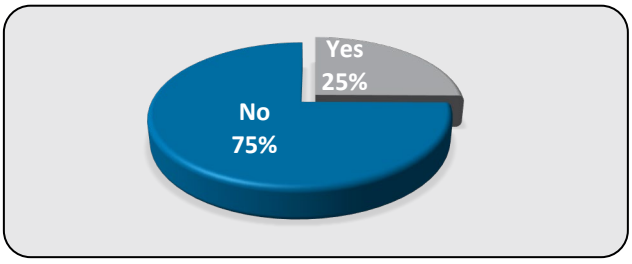
A summary of the results of the survey questions (3-8) for the six (6) sites are illustrated in the following pie charts along with the total number of participants:

3. Are you a trucker or an auto customer?



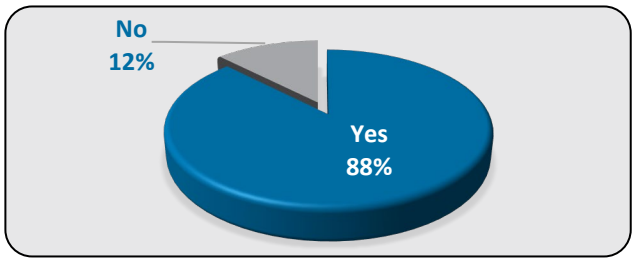
Trucker	*337*	*51%*
Auto Customer	*323*	*49%*
Total	***660***	***100%***

4. Is this your only stop on this trip today?



Yes	*166*	*25%*
No	*494*	*75%*
Total	***660***	***100%***

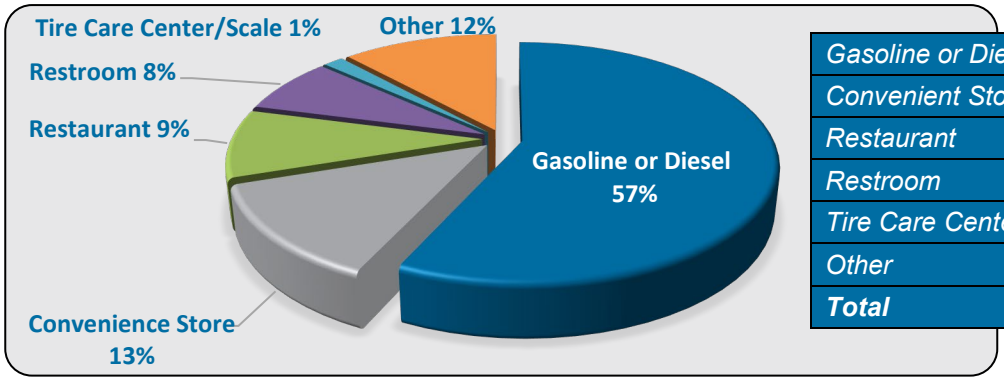
5. Did you exit the freeway to get to Love's Travel Stop?



Yes	*578*	*88%*
No	*82*	*12%*
Total	***660***	***100%***

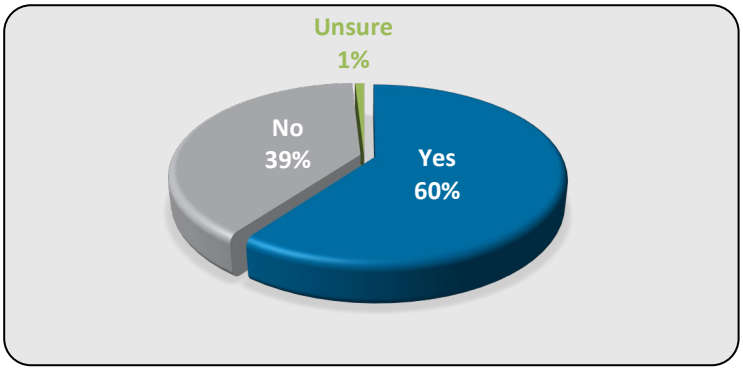
6. What are the Primary and Secondary purpose(s) for stopping at Love's Travel Stop?

a. *Gasoline or Diesel*
b. *Convenient Store*
c. *Restaurant*
d. *Restroom*
e. *Tire Care Center*
f. *Other*



Gasoline or Diesel	*376*	*57%*
Convenient Store	*85*	*13%*
Restaurant	*61*	*9%*
Restroom	*50*	*8%*
Tire Care Center/Scale	*10*	*2%*
Other	*78*	*12%*
Total	***660***	***100%***

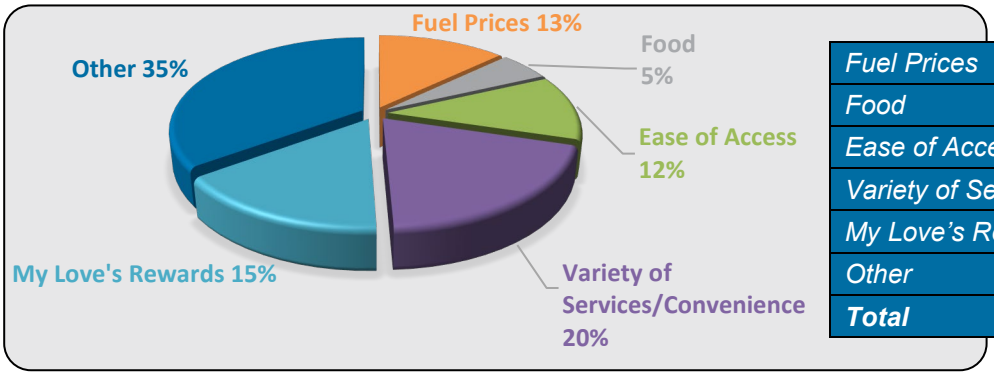
7. If you did not stop here, would you have stopped at another nearby location on your trip for purposes identified in Question #6?



Yes	*394*	*60%*
No	*256*	*39%*
Unsure	*6*	*1%*
Total	***656***	***100%***

8. What do you like best about Love's Travel Stops?

a. Fuel Prices
b. Food
c. Ease of Access
d. Variety of Services
e. My Love's Rewards
f. Other



Fuel Prices	*82*	*13%*
Food	*33*	*5%*
Ease of Access	*74*	*12%*
Variety of Services	*125*	*20%*
My Love's Rewards	*99*	*15%*
Other	*223*	*35%*
Total	***636***	***100%***

The in-field survey data collected at the six (6) Love's Travel Stops & Country Stores revealed that the majority of patrons are truckers (51%). Additionally, the primary business of Love's Travel Stops & Country Stores to be linked to truck drivers that utilize the vehicle fueling services. This is further validated by participant's answers to Question #6 that demonstrates 57% of respondents stated gasoline or diesel is the primary reason for stopping at Love's Truck Stop & Country Stores. These responses further reinforce that refueling is the primary purpose of the stop along the survey participant's route.

A key finding that resulted from the in-person survey was revealed in Question #5: Did you exit the freeway to get to the Love's Travel Stop? The overwhelming percentage (88% of participants) indicated that they exited the freeway to get to the Love's Travel Stop. This can be interpreted that these trip types [coming off of the freeway] are diverted link trips. When calculating VMT for this type of use, the diverted trip length from freeway exit to destination to freeway entrance can be summed per trip to derive VMT for 88% of the all vehicles.

Daily Traffic Volumes

Based upon the daily traffic counts collected by Metro Traffic Data, Inc., Omni-Means/GHD assessed adjacent street traffic volumes at the six (6) study sites. Daily counts were collected for a 3-day period beginning on Tuesday, November 7, 2017, thru Thursday, November 9, 2017. Daily and peak period of adjacent street peak hour are important components of trip generation analysis when comparing to peak hour of generator (i.e., project site traffic).

Table 3 below summarizes the 24-hour count for each of the six (6) study sites. This table identifies the average daily traffic (ADT) and AM/PM Peak period of the adjacent street. Proximity to nearest adjoining highway is a contributing factor for the daily and peak hour volume totals along the adjacent street corridor.

TABLE 3
LOVE'S TRAVEL STOPS DAILY TRAFFIC VOLUME AND PEAK HOURS

	Tulare		Lost Hills		Lodi		Santa Nella		Coachella		Barstow	
ADT Tues. (11/9/17)	7,580		3,592		11,190		3,624		4,687		2,605	
AM Peak	449	11:00-12:00	211	9:30-10:30	698	10:00-11:00	214	8:15-9:15	262	9:00-10:00	155	6:00-7:00
PM Peak	459	12:00-1:00	229	3:30-4:30	723	3:00-4:00	270	1:30-2:30	325	1:15-2:15	155	12:00-1:00
ADT Wed. (11/10/17)	7,361		3,355		10,879		3,537		4,812		2,601	
AM Peak	481	6:45-7:45	173	6:30-7:30	687	11:00-12:00	192	7:30-8:30	277	10:30-11:30	156	9:00-10:00
PM Peak	489	12:00-1:00	226	4:30-5:30	686	3:00-4:00	238	1:45-2:45	348	12:30-1:30	148	1:00-2:00
ADT Thurs. (11/11/17)	7,847		4,065		11,365		4,076		5,305		2,696	
AM Peak	469	7:15-8:15	201	8:30-9:30	695	11:00-12:00	236	11:00-12:00	329	9:45-10:45	149	6:00-7:00
PM Peak	489	12:15-1:15	242	4:15-5:15	735	12:00-1:00	262	4:15-5:15	335	12:45-1:45	172	3:45-4:45
ADT Total	**22,788**		**11,012**		**33,434**		**11,237**		**14,804**		**7,902**	
ADT Average	**7,596**		**3,671**		**11,145**		**3,746**		**4,935**		**2,634**	

As shown in Table 3, adjacent street average traffic volumes vary substantially, i.e., they range from approximately 2,600 to 11,150, depending upon geographic location of the site. In addition, the traffic generated at each project site have is a range of other attributes, including proximity of a state, interstate highway facility, or major arterial street; traffic volumes of highway facility; location of nearest competitor; on-site service provided; etc.

Table 4 shows daily traffic volumes and peak hours at the nearest adjoining street or street segment that provide direct access to the Love's Travel Stop. Traffic data at these locations represent a 3-day average (Tuesday thru Thursday) along the local street. Additionally, Table 4 shows daily traffic volumes of nearest adjoining highway volumes (per Caltrans 2016), including a breakdown between vehicle and truck ADT and percentage trucks.

TABLE 4
LOVE'S TRAVEL STOPS DAILY TRAFFIC VOLUMES AND PEAK HOURS

	Nearest Adjoining Street/Street Segment				Nearest Adjoining Highway Volumes (per Caltrans 2016)				
	Love's Location	Street	Segment	3-Day ADT Average*	Adjoining Major Highway	Intersecting Local Road	Vehicle ADT	Truck ADT	Truck %
A	**Lodi**	Thornton Road	North of SR12	11,145	I-5	SR-12	58,100	11,879	20.5
B	**Santa Nella**	Plaza Drive	West of Santa Nella Blvd	3,746	I-5	SR-33	29,100	8,780	30.2
C	**Tulare**	Blackstone Street	South of Paige Avenue	7,596	SR-99	Paige Avenue	57,000	13,678	24.0
D	**Lost Hills**	Warren Street	North of SR 46	3,671	I-5	SR-46	40,500	10,530	26.0
E	**Barstow**	High Desert Road	West of Lenwood Road	2,634	I-15	Lenwood Road	58,000	13,869	23.9
F	**Coachella**	Vista Del Norte	West of Dillon Road	4,935	I-10	Dillon Road	27,000	8,588	35.5

* *3-Day ADT Average from Table 3*

Project Traffic Volumes

As a result of video data collection efforts, Omni-Means/GHD evaluated project driveway operations in terms peak periods and traffic volumes. Typical AM (7:00 to 9:00 AM) and PM (4:00 to 6:00 PM) peak hour driveway traffic volumes were extracted from video data. The data was further delineated between passenger cars (P) and trucks (T) at each study site and summarized for the 6 study sites. Because all Love's Travel Stops have multiple driveways, the driveway #s were also identified, as previously shown in Figure 2. Table 5 summarizes daily, AM and PM driveway trips at each location and summarizes the results cumulatively.

TABLE 5
LOVE'S TRAVEL STOPS DAILY DRIVEWAY OPERATIONS VOLUMES AND PEAK HOURS

Location	Driveway (#)	Daily Trips				AM Peak Hour (7:00 - 9:00 AM)				PM Peak Hour (4:00 - 6:00 PM)			
		Ins (P)	Ins (T)	Outs (P)	Outs (T)	Ins (P)	Ins (T)	Outs (P)	Outs (T)	Ins (P)	Ins (T)	Outs (P)	Outs (T)
Tulare	1	1,917	87	1,936	99	106	7	102	10	115	2	121	2
	2	44	1,149	17	83	3	54	1	3	2	63	1	3
	3	40	208	63	1,269	5	15	5	70	2	14	4	63
Subtotal		*2,001*	*1,443*	*2,016*	*1,451*	*114*	*77*	*109*	*83*	*119*	*80*	*126*	*68*
Lost Hills	4	15	820	7	182	0	42	0	12	2	45	1	7
	5	3	26	14	420	0	1	1	20	0	1	1	20
	6	17	52	11	295	2	2	1	14	1	3	1	15
	7	174	11	720	31	8	0	31	0	10	0	42	1
	8	845	27	299	13	34	1	8	1	46	0	19	0
Subtotal		*1,055*	*936*	*1,051*	*941*	*45*	*47*	*40*	*47*	*58*	*50*	*64*	*44*
Lodi	9	24	171	35	952	0	6	1	52	0	8	3	38
	10	305	853	247	77	12	45	12	2	22	35	20	7
	11	1,340	41	1,397	45	65	5	63	3	91	3	99	3
Subtotal		*1,669*	*1,066*	*1,679*	*1,074*	*77*	*56*	*77*	*57*	*113*	*46*	*122*	*48*
Santa	12	14	254	19	988	1	16	2	54	1	17	1	45
Nella	13	12	744	8	17	0	38	0	0	0	40	0	0
	14	397	26	145	11	19	3	5	0	28	2	11	1
	15	111	4	390	24	8	0	19	1	4	0	27	1
Subtotal		*534*	*1,028*	*562*	*1,041*	*28*	*56*	*26*	*56*	*33*	*58*	*39*	*47*
Coachella	16	18	209	16	440	0	8	1	35	1	11	0	21
	17	900	70	919	903	47	4	44	38	55	4	64	38
	18	21	1,128	12	57	1	52	1	1	1	52	1	5
Subtotal		*939*	*1,406*	*946*	*1,401*	*48*	*64*	*45*	*74*	*57*	*67*	*66*	*65*
Barstow	19	7	27	25	1,036	0	1	1	52	1	3	3	52
	20	24	1,010	10	61	1	50	1	2	0	57	1	2
	21	88	14	168	21	4	1	9	1	6	2	12	3
	22	645	30	569	22	37	2	28	2	46	1	43	1
Subtotal		*764*	*1,081*	*772*	*1,141*	*42*	*55*	*38*	*57*	*54*	*63*	*58*	*58*
TOTAL (AVG.)		***6,962***	***6,961***	***7,026***	***7,048***	***355***	***354***	***335***	***374***	***433***	***364***	***475***	***329***

(P) = Passenger; (T) = Trucks

Table 5 demonstrates that although passenger vehicles and trucks vary by specific location, overall (when summarizing the 6 data sets), there is a fairly even split between the vehicle types, i.e., cars vs. trucks. This is very similar to Travel Survey Response #3 [*Are you a trucker or an auto customer?*], where 51% of the respondents said they were truck customers and 49% of the respondents said that they were automobile customers.

Phase 3 – Summary, Conclusions and Recommendations

Trip Generation Rates Summary

Based upon the data collected in Phase 2, trip generation rates were developed for each location and cumulatively for all 6 locations. The trip generation rates were calculated for typical weekday conditions only. Data was not collected during the weekend. However, trip generation rates were calculated for vehicle fueling positions (VFP) and per gross floor area (GFA) per 1,000 sq. ft. of building area. Daily, AM and PM trip rates and percentages (ins and outs) are shown for each category.

Vehicle Fueling Positions

Table 6 identifies number of vehicle fueling positions (VFP), trips, rate, and in and out percentage for daily, AM and PM periods at each of the sites. The last row of Table 6 shows the cumulative average of the VFP daily and peak hour rates. Additionally, Figures 3 – 5 show the cumulative average vehicle trip generation for VFP under Weekday, AM and PM conditions, respectively.

TABLE 6
LOVE'S TRAVEL STOPS VFP DAILY AND PEAK HOURS RATES

	Unit	Daily Trips/Rate		AM Peak Hour Trips/Rates						PM Peak Hour Trips/Rates					
Location	VFP	Daily Trips	VFP Rate	AM Peak Hour Trips	AM Rate	AM Peak Hour (Trips In)	AM Peak Hour (Trips Out)	In (%)	Out (%)	PM Peak Hour Trips	PM Rate	PM Peak Hour (Trips In)	PM Peak Hour (Trips Out)	In (%)	Out (%)
Tulare	25	6,911	276.43	383	15.31	191	192	0.50	0.50	393	15.72	199	194	0.51	0.49
Lost Hills	19	3,982	209.60	179	9.42	92	87	0.51	0.49	216	11.39	108	108	0.50	0.50
Lodi	24	5,488	228.67	267	11.11	133	134	0.50	0.50	328	13.68	159	169	0.48	0.52
Santa Nella	20	3,165	158.27	167	8.35	85	82	0.51	0.49	177	8.85	91	86	0.52	0.48
Coachella	18	4,692	260.69	231	12.85	112	119	0.48	0.52	254	14.09	123	130	0.49	0.51
Barstow	26	3,758	144.55	191	7.36	97	95	0.51	0.49	233	8.97	117	117	0.50	0.50
Average	**22**	**4,666**	**213.03**	**236**	**10.73**	**118**	**118**	**0.50**	**0.50**	**267**	**12.12**	**133**	**134**	**0.50**	**0.50**

VFP = Vehicle Fueling Positions (number of pumps)

FIGURE 3: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER VFP (WEEKDAY)

Love's Travel Stop

Vehicle Trip Ends vs:	**Vehicle Fueling Positions**
On a:	**Weekday**
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. Num. of Vehicle Fueling Positions:	22
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per Vehicle Fueling Position

Average Rate	Range of Rates	Standard Deviation
213.03	144.55 - 273.43	3.41

Data Plot and Equation

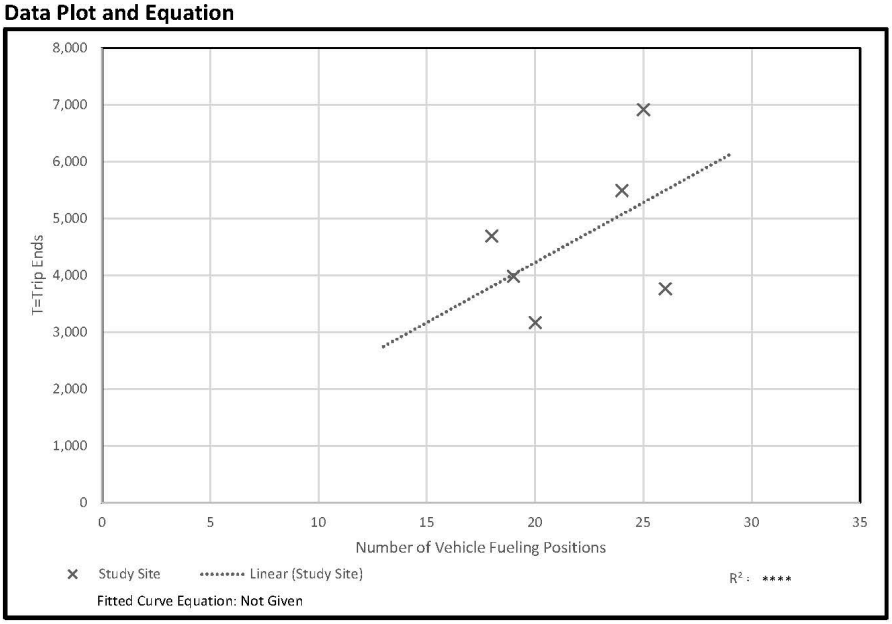


FIGURE 4: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER VFP (AM PEAK)

Love's Travel Stop

Vehicle Trip Ends vs:	**Vehicle Fueling Positions**
On a:	**Weekday,**
	AM Peak Hour of Generator
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. Num. of Vehicle Fueling Positions:	22
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per Vehicle Fueling Position

Average Rate	Range of Rates	Standard Deviation
10.73	7.36 - 15.31	3.41

Data Plot and Equation

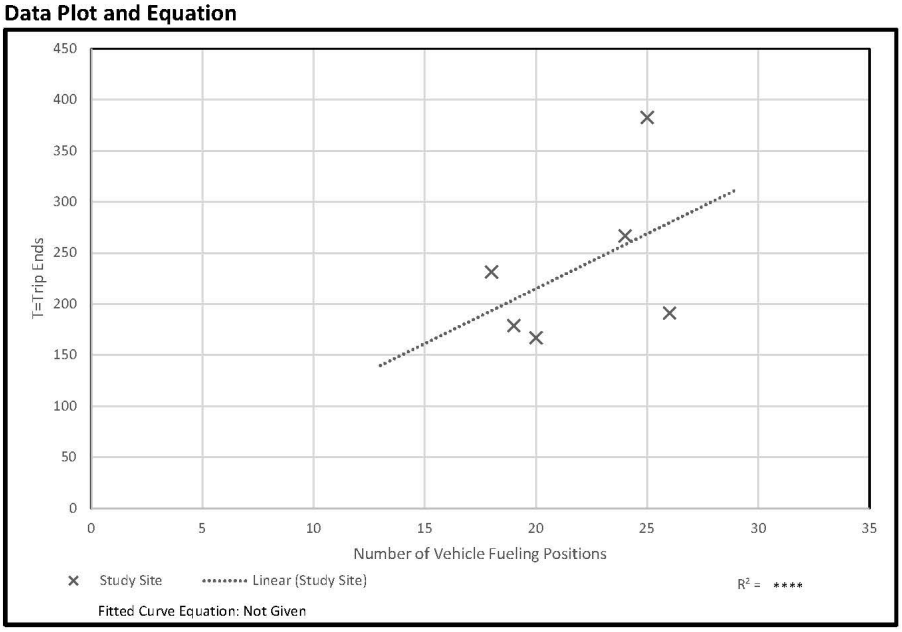


FIGURE 5: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER VFP (PM PEAK)

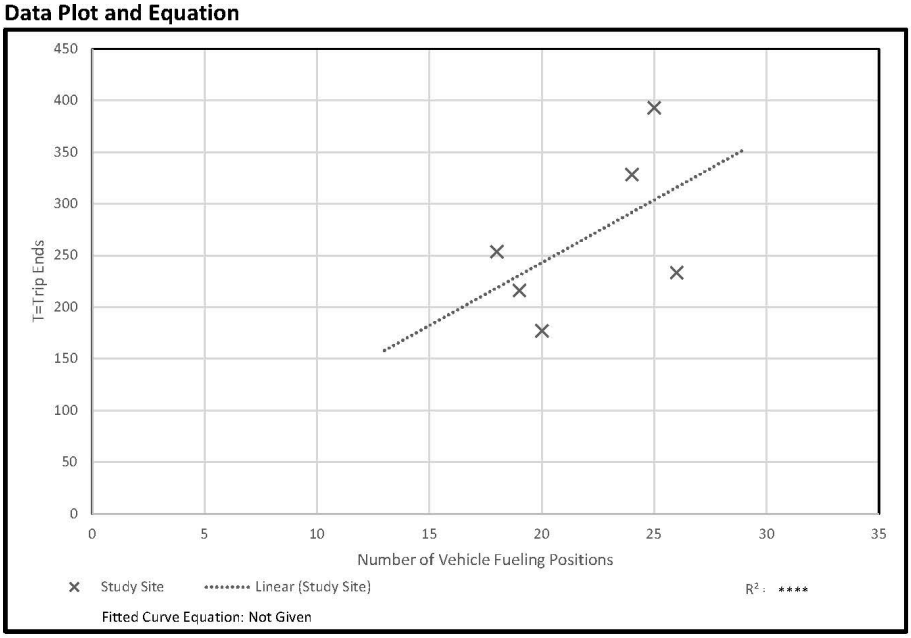
Love's Travel Stop

Vehicle Trip Ends vs:	**Vehicle Fueling Positions**
On a:	**Weekday,**
	PM Peak Hour of Generator
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. Num. of Vehicle Fueling Positions:	22
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per Vehicle Fueling Position

Average Rate	Range of Rates	Standard Deviation
12.12	8.97 - 15.72	3.41

Data Plot and Equation



Fitted Curve Equation: Not Given

Gross Floor Area

Table 7 identifies number of gross floor area (GFA x 1,000 sf), trips, rates, and ins and outs percentage for daily, AM and PM periods at each of the sites. The last row of Table 7 shows the cumulative average of the GFA daily and peak hour rates. Additionally, Figures 6 – 8 show the average vehicle trip generation for GFA under Weekday, AM and PM conditions, respectively.

TABLE 7
LOVE'S TRAVEL STOPS GFA DAILY AND PEAK HOURS RATES

	Unit (x 1,000)	Daily Trips/Rate		AM Peak Hour Trips/Rates						PM Peak Hour Trips/Rates					
Location	GFA (sf)	Daily Trips	GFA Rate	AM Peak Hour Trips	AM Rate	AM Peak Hour (Trips In)	AM Peak Hour (Trips Out)	In (%)	Out (%)	PM Peak Hour Trips	PM Rate	AM Peak Hour (Trips In)	AM Peak Hour (Trips Out)	In (%)	Out (%)
Tulare	10.4	6,911	664.49	383	36.79	191	192	0.50	0.50	393	37.79	199	194	0.51	0.49
Lost Hills	7.9	3,982	504.09	179	22.66	92	87	0.51	0.49	216	27.38	108	108	0.50	0.50
Lodi	10.5	5,488	522.67	267	25.40	133	134	0.50	0.50	328	31.27	159	169	0.48	0.52
Santa Nella	9.9	3,165	319.73	167	16.87	85	82	0.51	0.49	177	17.88	91	86	0.52	0.48
Coachella	7.3	4,692	642.79	231	31.69	112	119	0.48	0.52	254	34.75	123	130	0.49	0.51
Barstow	9.4	3,758	399.82	191	20.35	97	95	0.51	0.49	233	24.82	117	117	0.50	0.50
Average	**9.2**	**4,666**	**508.93**	**236**	**25.63**	**118**	**118**	**0.50**	**0.50**	**267**	**28.98**	**133**	**134**	**0.50**	**0.50**

GFA = Gross Floor Area per 1,000 sq.ft. (sf)

FIGURE 6: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER GFA (WEEKDAY)

Love's Travel Stop

Vehicle Trip Ends vs:	**1000 Sq. Ft. GFA**
On a:	**Weekday**
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. 1000 Sq.Ft. GFA:	9.2
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
508.93	319.73 - 664.49	1.34

Data Plot and Equation

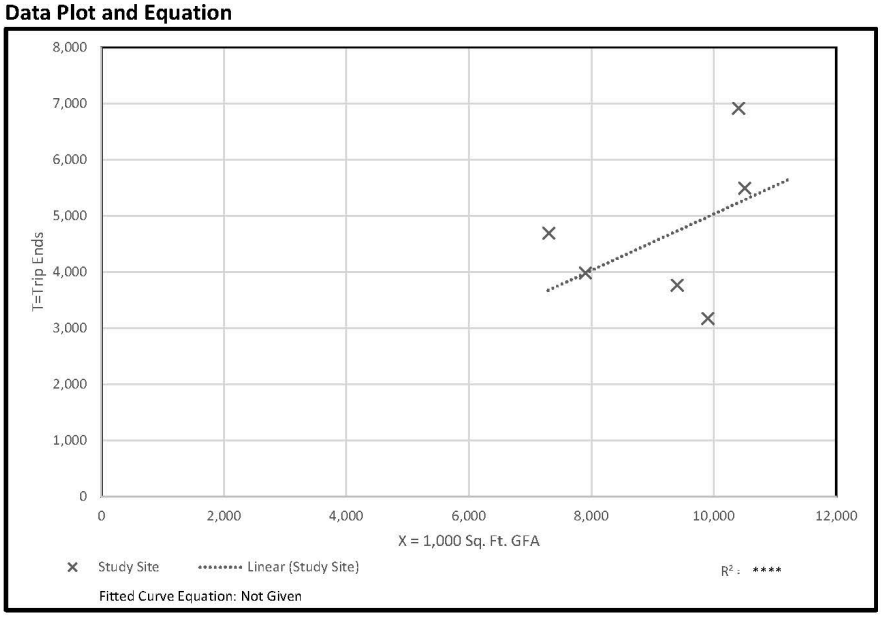


FIGURE 7: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER GFA (AM PEAK)

Love's Travel Stop

Vehicle Trip Ends vs:	**1000 Sq. Ft. GFA**
On a:	**Weekday,**
	Peak Hour of Adjacent Street Traffic,
	One Hour Between 7 and 9 a.m.
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. 1000 Sq.Ft. GFA:	9.2
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
25.63	16.87 - 36.79	1.34

Data Plot and Equation

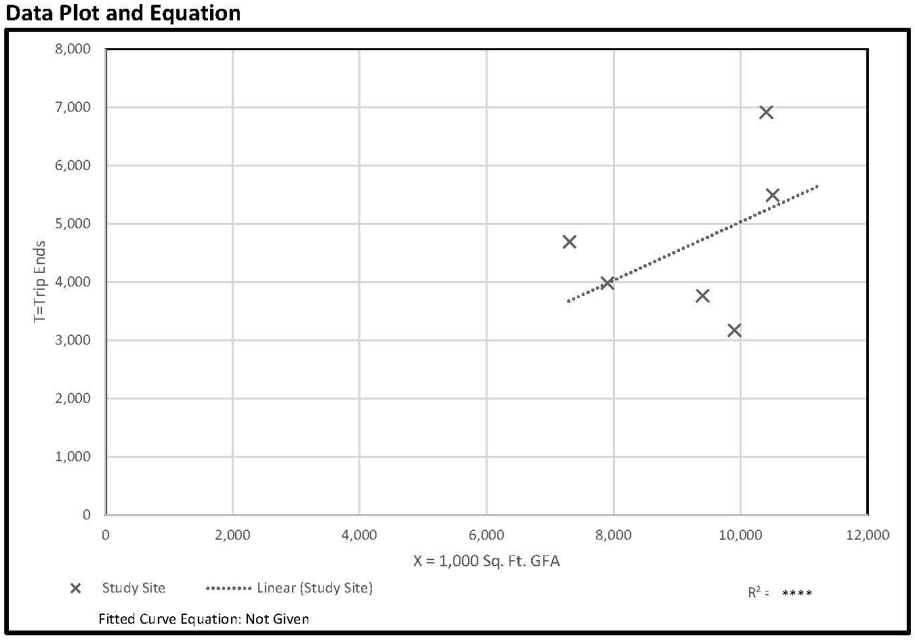


FIGURE 8: LOVE'S TRAVEL STOPS TRIP GENERATION RATES PER GFA (PM PEAK)

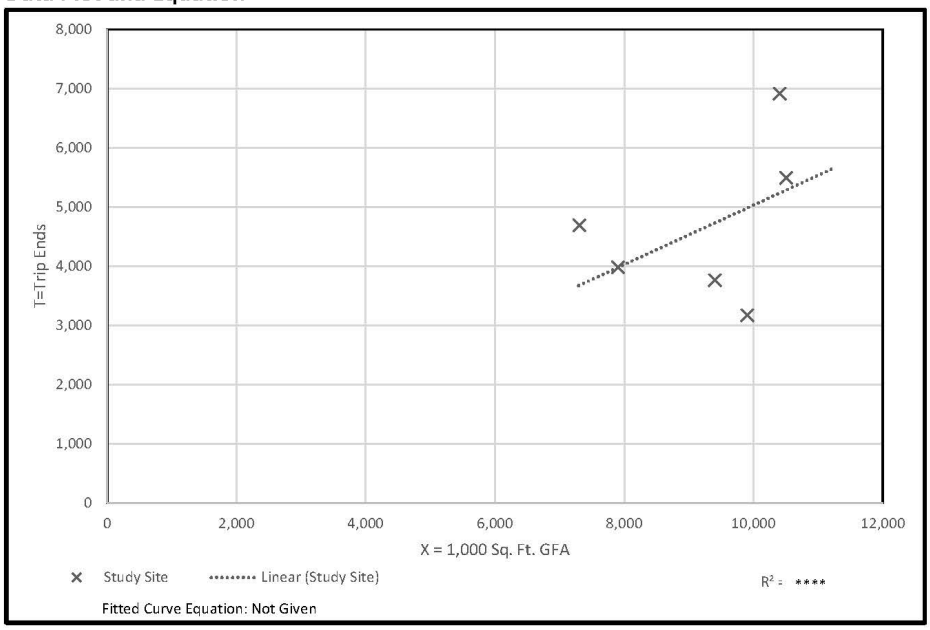
Love's Travel Stop

Vehicle Trip Ends vs:	**1000 Sq. Ft. GFA**
On a:	**Weekday,**
	Peak Hour of Adjacent Street Traffic,
	One Hour Between 4 and 6 p.m.
Setting/Location:	**General Urban/Suburban**
Number of Studies:	6
Avg. 1000 Sq.Ft. GFA:	9.2
Directional Distribution:	50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
28.98	17.99 - 37.79	1.34

Data Plot and Equation



Conclusions & Recommendations

As a result of this Technical Paper, it is recommended that the data provided in this report be used solely for development of modern travel stops of this nature as described in the Introduction. Or this data could be used in combination with a more compatible land use, i.e., ITE Land Use Code 950 (Truck Stop), to encompass a larger data set. However, detailed information pertaining to trip generation rates and data collected for LUC 950 would need to be further examined in order to correspond to data collected in this Technical Paper.

Moreover, trips of this nature (modern travel stops) should be recognized as containing an extremely high percentage (88% in this case) of pass-by and/or diverted-link trips. These pass-by and/or diverted-link trips play a substantial role in calculating VMT, particularly in California. These pass-by and/or diverted-link trips are already on the roadway system and need to be accounted for as such when calculating VMT. A sample equation for development of how diverted link trip distance is measured using the following formula per one direction (on and off)[2]:

[PER DIRCTION (N, S, E, W)]

$VMT_{DL} = VMT_{GDL} - VMT_{NDL}$

Where:

VMT_{DL} = Diverted Link VMT
VMT_{GDL} = Gross Diverted Link VMT
VMT_{NDL} = Net Diverted Link VMT

And:

$VMT_{GDL} = [(ADT_T * L_{PBOFF} + ADT_C * L_{PBOFF}) + (ADT_T * L_{PBON} + ADT_C * L_{PBON})]$;

L_{PBOFF} = Pass-by Off-Ramp Length to Driveway (Mi.)
L_{PBON} = Pass-by On-Ramp Length from Driveway to On-Ramp Merging Point (Mi.)
ADT_T = Truck Average Daily Traffic
ADT_C = Car Average Daily Traffic

And:

$VMT_{NDL} = VMT_{GDL} – (ADT_T * L_{PB} + ADT_C * L_{PB})$;

L_{PB} = Distance between Off-Ramp Exit to On-Ramp Merging Point (Mi.)

Following calculation of diverted-link trips (88%) as identified above for two directions of travel, the remaining 12% of primary trips would need to be calculated following local [or state] VMT

[2] Diverted Link Trip Lengths Figures for the Love's Travel Stops and Country Stores study sites is included as an Attachment. Figures provided by Lane Engineers, Inc.

guidelines and standards. For example, the California Emissions Estimator Model (CalEEMod) estimates the average trip length of convenience market (24-hours) is 2.1 miles and the average trip length of a gasoline/service station is 1.6 miles. To estimate overall VMT, these two components would need to be combined to identify projected VMT.

It should be noted that the VMT calculation for cars and trucks only assumes a single trip to/from the Love's Travel Stops and Country Stores; additional trips to adjacent land uses near the ramp terminus for other purposes is not identified in this formula.

Attachments

- Vehicle and Truck Trip Survey (Questionnaire)
- Vehicle and Truck Trip Survey Summary Results by Location
- Driveway Counts (Metro Traffic Data, Inc.)
- Diverted Link Trip Lengths (Lane Engineers, Inc.)

Vehicle and Truck Trip Survey (Questionnaire)

Vehicle and Truck Trip Survey

SURVEY TO BE COMPLETED BY SURVEYOR

For Surveyor Use Only
Date:
Time:
Location:

QUESTIONS

1 **Where did you begin your trip? (City or Town)** _____

2 **Where will you end your trip? (City or Town)** _____

3 **Are you a trucker or an auto customer?**

a) Trucker
b) Auto Customer

4 **Is this your only stop on your trip today? (Yes or No)**

a) Yes
b) No

5 **Did you exit the freeway to get to Love's Travel Stop? (Circle One)**

a) Yes
b) No

6 **What are the PRIMARY and SECONDARY purpose(s) for stopping at Love's Travel Stop? (Two Part Question)**

PRIMARY	SECONDARY (Circle All That Apply)	
☐	*a) Gasoline or Diesel*	
☐	*b) Covenience Store*	
☐	*c) Restaurant*	
☐	*d) Restroom*	
☐	*e) Tire Care Center (Truckers Only)*	
☐	*f) Other (Please Specify)*	_____

Surveyor: Indicate PRIMARY reason for stop by checking box ☒

7 **If you did not stop here, would you have stopped at another nearby location on your trip for purposes indentified in Questions #6? (Circle One)**

a) Yes
b) No
c) Unsure

8 **What do you like best about Love's Travel Stop? (Circle One)**

a) Fuel Prices
b) Food
c) Ease of Access
d) Variety of Services/Convenience
e) My Love Rewards
f) Other (Please Specify) _____

Vehicle and Truck Trip Survey Summary Results by Location

Vehicle and Truck Trip Survey

DRAFT - FOR DISCUSSION PURPOSES ONLY

			Overall		*Barstow*		*Coachella*		*Lodi*		*Lost Hills*		*Santa Nella*		*Tulare*		*Comments*
3	**Are you a trucker or an auto customer?**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
	a) Trucker		337	51.1%	61	53.5%	41	40.6%	54	51.9%	58	54.2%	68	64.8%	55	42.6%	
	b) Auto Customer		323	48.9%	53	46.5%	60	59.4%	50	48.1%	49	45.8%	37	35.2%	74	57.4%	
		TOT	660		114		101		104		107		105		129		
4	**Is this your only stop on your trip today? (Yes or No)**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
	a) Yes		166	25.2%	38	33.3%	44	43.6%	17	16.3%	2	1.9%	11	10.5%	54	41.9%	
	b) No		494	74.8%	76	66.7%	57	56.4%	87	83.7%	105	98.1%	94	89.5%	75	58.1%	
		TOT	660		114		101		104		107		105		129		
5	**Did you exit the freeway to get to Love's Travel Stop? (Circle One)**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
	a) Yes		578	87.6%	99	86.8%	88	87.1%	93	89.4%	101	94.4%	96	91.4%	101	78.3%	
	b) No		82	12.4%	15	13.2%	13	12.9%	11	10.6%	6	5.6%	9	8.6%	28	21.7%	
		TOT	660		114		101		104		107		105		129		
6	**What are the PRIMARY and SECONDARY purpose(s) for stopping at Love's Travel Stop?**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
	PRIMARY	**a) Gasoline or Diesel**	376	57.0%	74	64.9%	68	67.3%	54	51.9%	65	60.7%	56	53.3%	59	45.7%	
		b) Covenience Store	85	12.9%	10	8.8%	11	10.9%	17	16.3%	13	12.1%	12	11.4%	22	17.1%	
		c) Restaurant	61	9.2%	9	7.9%	12	11.9%	5	4.8%	7	6.5%	4	3.8%	24	18.6%	
		d) Restroom	50	7.6%	0	0.0%	6	5.9%	15	14.4%	7	6.5%	12	11.4%	10	7.8%	
		e) Tire Care Center/Scale	10	1.5%	2	1.8%	1	1.0%	3	2.9%	0	0.0%	2	1.9%	2	1.6%	
		f) Other (Please Specify)	78	11.8%	19	16.7%	3	3.0%	10	9.6%	15	14.0%	19	18.1%	12	9.3%	
		TOT	660		114		101		104		107		105		129		Break, shower, sleep, rest, oil, battery, Transflow, load check
7	**If you did not stop here, would you have stopped at another nearby location on your trip for purposes idenified in Question #6:**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
	a) Yes		394	60.1%	66	57.9%	62	61.4%	52	50.0%	79	73.8%	68	64.8%	67	51.9%	Nearby location mave have been misunderstood
	b) No		256	39.0%	48	42.1%	39	38.6%	51	49.0%	24	22.4%	36	34.3%	58	45.0%	
	c) Unsure		6	0.9%	0	0.0%	0	0.0%	1	1.0%	4	3.7%	1	1.0%	4	3.1%	
		TOT	656		114		101		104		107		105		129		
8	**What do you like best about Love's Travel Stop?**		**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
		a) Fuel Prices	82	12.9%	14	12.3%	18	17.8%	15	14.4%	9	8.6%	9	8.6%	17	15.9%	
		b) Food	33	5.2%	10	8.8%	5	5.0%	4	3.8%	3	2.9%	3	2.9%	8	7.5%	
		c) Ease of Access	74	11.6%	15	13.2%	12	11.9%	10	9.6%	14	13.3%	14	13.3%	9	8.4%	
		d) Variety of Services/Convenience	125	19.7%	16	14.0%	23	22.8%	20	19.2%	21	20.0%	21	20.0%	24	22.4%	
		e) My Love's Rewards	99	15.6%	18	15.8%	10	9.9%	13	12.5%	18	17.1%	18	17.1%	22	20.6%	
		f) Other (Please Specify)	223	35.1%	41	36.0%	33	32.7%	42	40.4%	40	38.1%	40	38.1%	27	25.2%	Friendly, clean, showers, hours, everything, sweet tea, fast, staff, the girls (Barstow), tire pass, hospitality, coffee, the name, atmoshpere, rewards
		TOT	636		114		101		104		105		105		107		

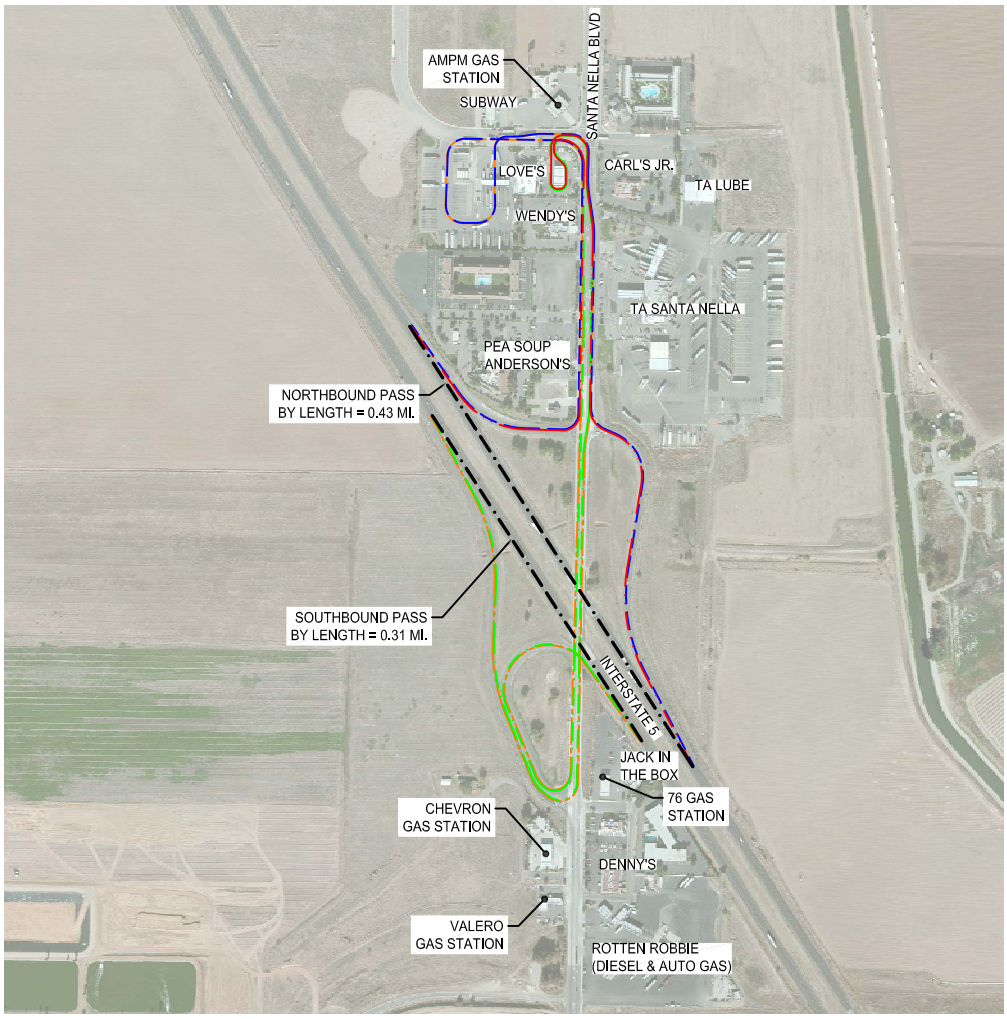
Diverted Link Trip Lengths
(Lane Engineers, Inc.)

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www.laneengineers.com

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NOTES:

1. SUBTRACT THE PASS BY LENGTH FROM THE GROSS DIVERTED LINK ROUNDTRIP LENGTH TO OBTAIN THE NET DIVERTED LINK ROUNDTRIP LENGTH.
2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

NORTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.08 MI. (NET = 0.65 MI.)
NORTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.54 MI. (NET = 0.33 MI.)

NORTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.28 MI. (NET = 0.85 MI.)
NORTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.64 MI. (NET = 0.43 MI.)

SOUTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.83 MI. (NET = 1.52 MI.)
SOUTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.92 MI. (NET = 0.76 MI.)

SOUTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 2.02 MI. (NET = 1.71 MI.)
SOUTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 1.01 MI. (NET = 0.86 MI.)

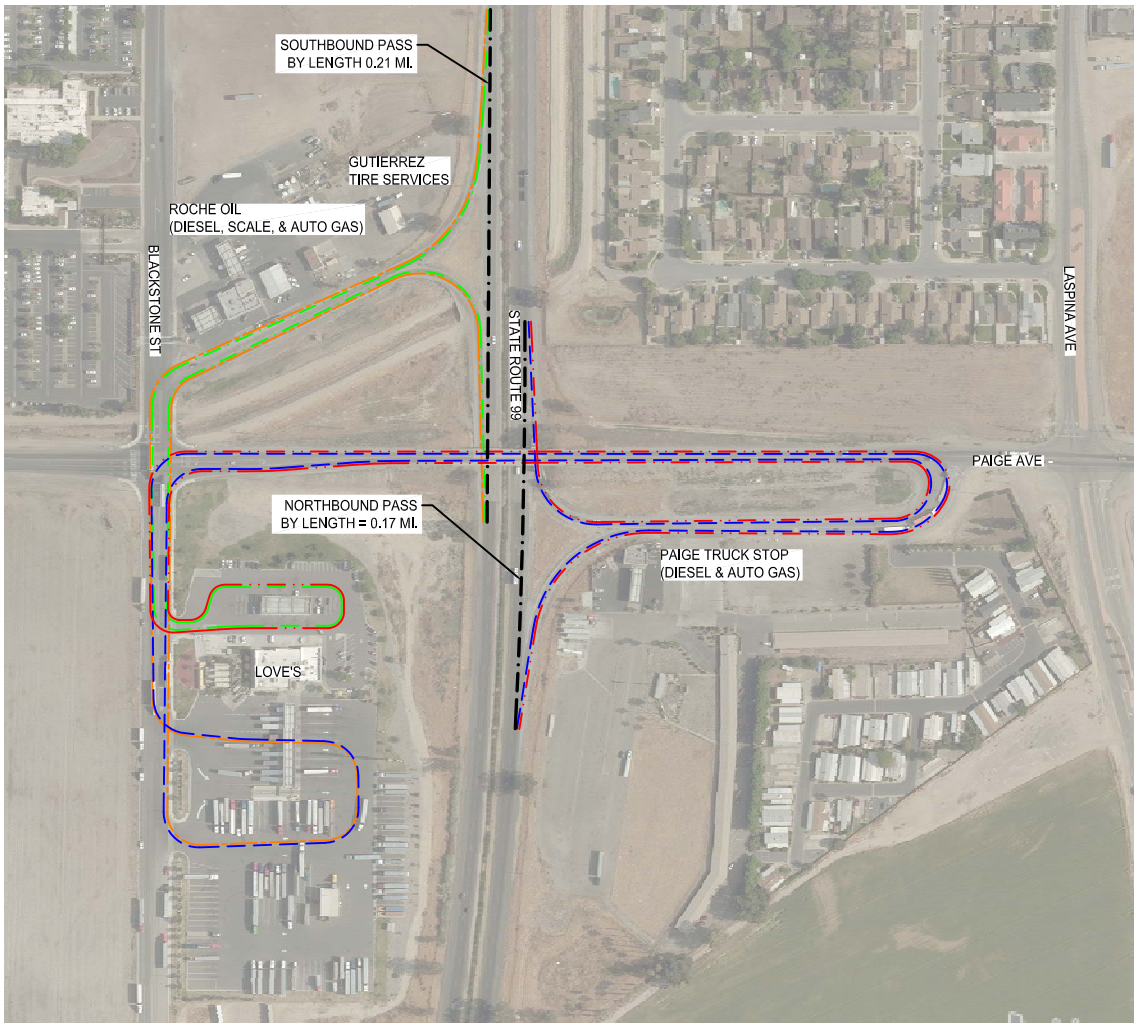
SANTA NELLA TRAVEL STOP DIVERTED LINK TRIP LENGTHS

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NOTES:

1. SUBTRACT THE PASS BY LENGTH FROM THE GROSS DIVERTED LINK ROUNDTRIP LENGTH TO OBTAIN THE NET DIVERTED LINK ROUNDTRIP LENGTH.
2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

NORTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.41 MI. (NET = 1.24 MI.)
NORTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.71 MI. (NET = 0.62 MI.)

NORTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.56 MI. (NET = 1.39 MI.)
NORTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.78 MI. (NET = 0.70 MI.)

SOUTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 0.81 MI. (NET = 0.60 MI.)
SOUTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.41 MI. (NET = 0.30 MI.)

SOUTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 0.96 MI. (NET = 0.75 MI.)
SOUTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.48 MI. (NET = 0.38 MI.)

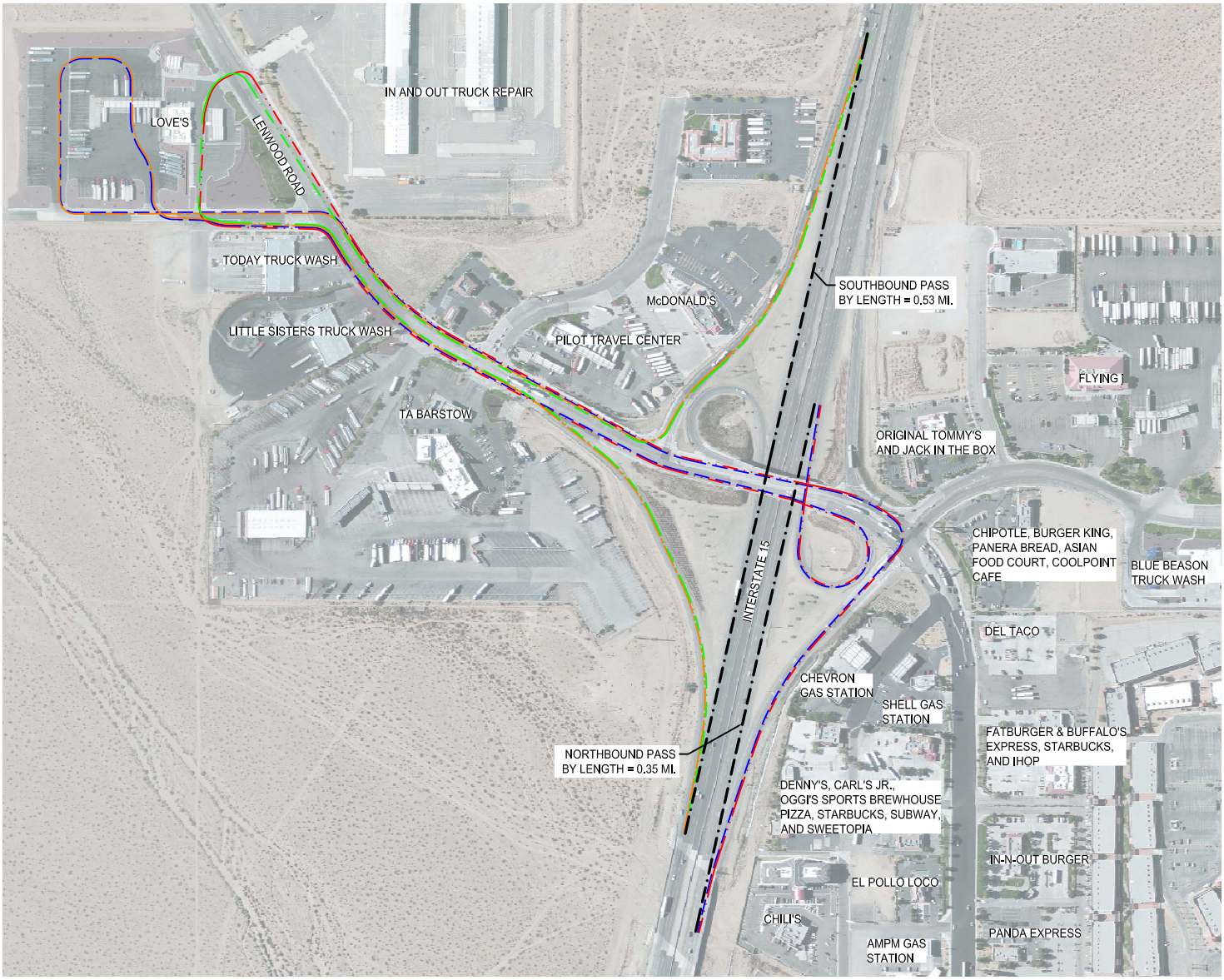
TULARE TRAVEL STOP DIVERTED LINK TRIP LENGTHS

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2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

NORTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.63 MI. (NET = 1.28 MI.)
NORTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.82 MI. (NET = 0.64 MI.)

NORTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.85 MI. (NET = 1.50 MI.)
NORTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.93 MI. (NET = 0.75 MI.)

SOUTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.37 MI. (NET = 0.84 MI.)
SOUTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.69 MI. (NET = 0.42 MI.)

SOUTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.59 MI. (NET = 1.07 MI.)
SOUTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.80 MI. (NET = 0.54 MI.)

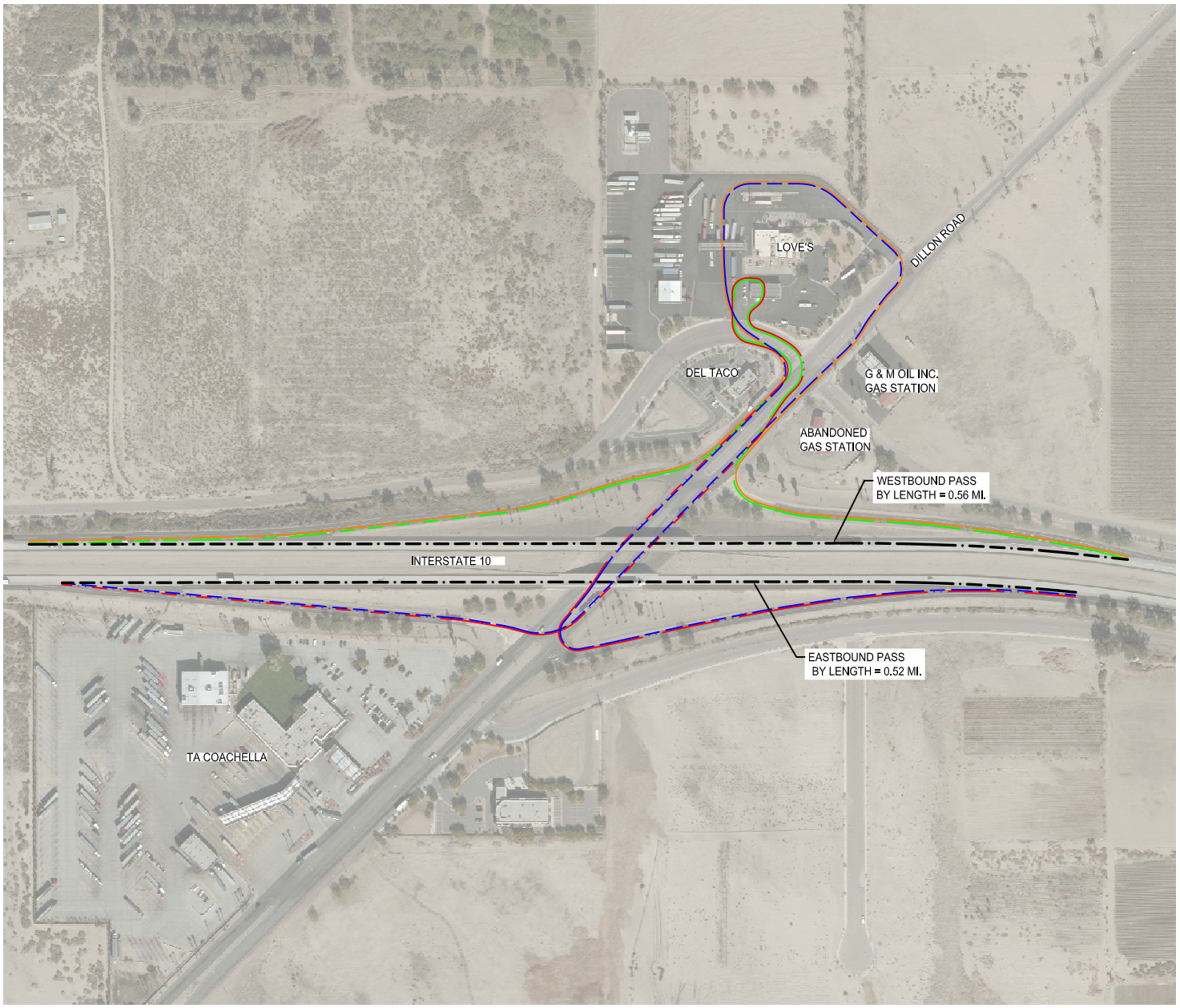
BARSTOW TRAVEL STOP DIVERTED LINK TRIP LENGTHS

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2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

EASTBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.03 MI. (NET = 0.51 MI.)
EASTBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.52 MI. (NET = 0.26 MI.)

EASTBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.17 MI. (NET = 0.75 MI.)
EASTBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.59 MI. (NET = 0.38 MI.)

WESTBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 0.82 MI. (NET = 0.26 MI.)
WESTBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.41 MI. (NET = 0.13 MI.)

WESTBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 0.97 MI. (NET = 0.41 MI.)
WESTBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.49 MI. (NET = 0.21 MI.)

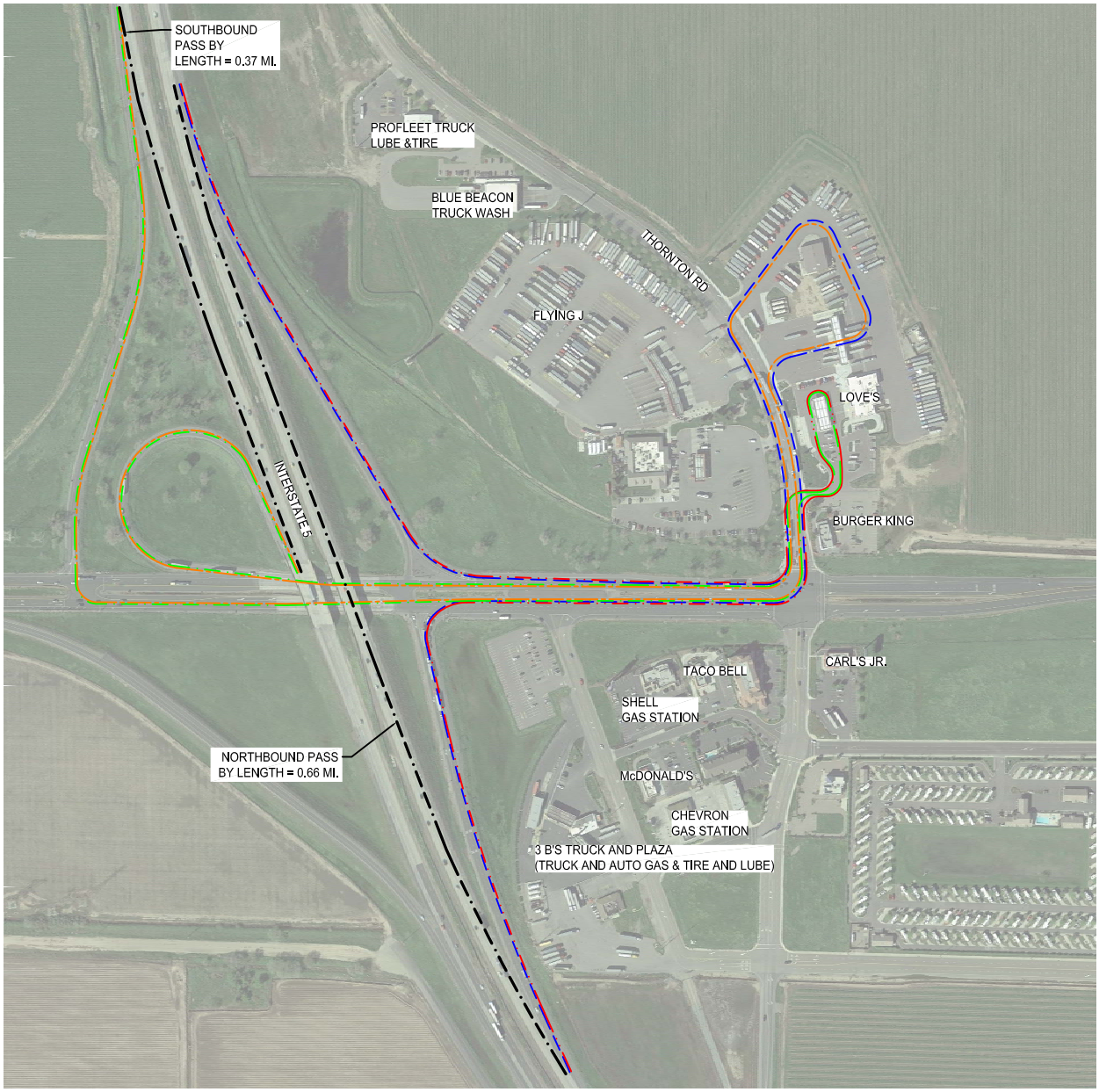
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1. SUBTRACT THE PASS BY LENGTH FROM THE GROSS DIVERTED LINK ROUNDTRIP LENGTH TO OBTAIN THE NET DIVERTED LINK ROUNDTRIP LENGTH.
2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

NORTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.37 MI. (NET = 0.71 MI.)
NORTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.69 MI. (NET = 0.36 MI.)

NORTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.62 MI. (NET = 0.96 MI.)
NORTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.81 MI. (NET = 0.48 MI.)

SOUTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.34 MI. (NET = 0.97 MI.)
SOUTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.67 MI. (NET = 0.49 MI.)

SOUTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.96 MI. (NET = 1.59 MI.)
SOUTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.98 MI. (NET = 0.80 MI.)

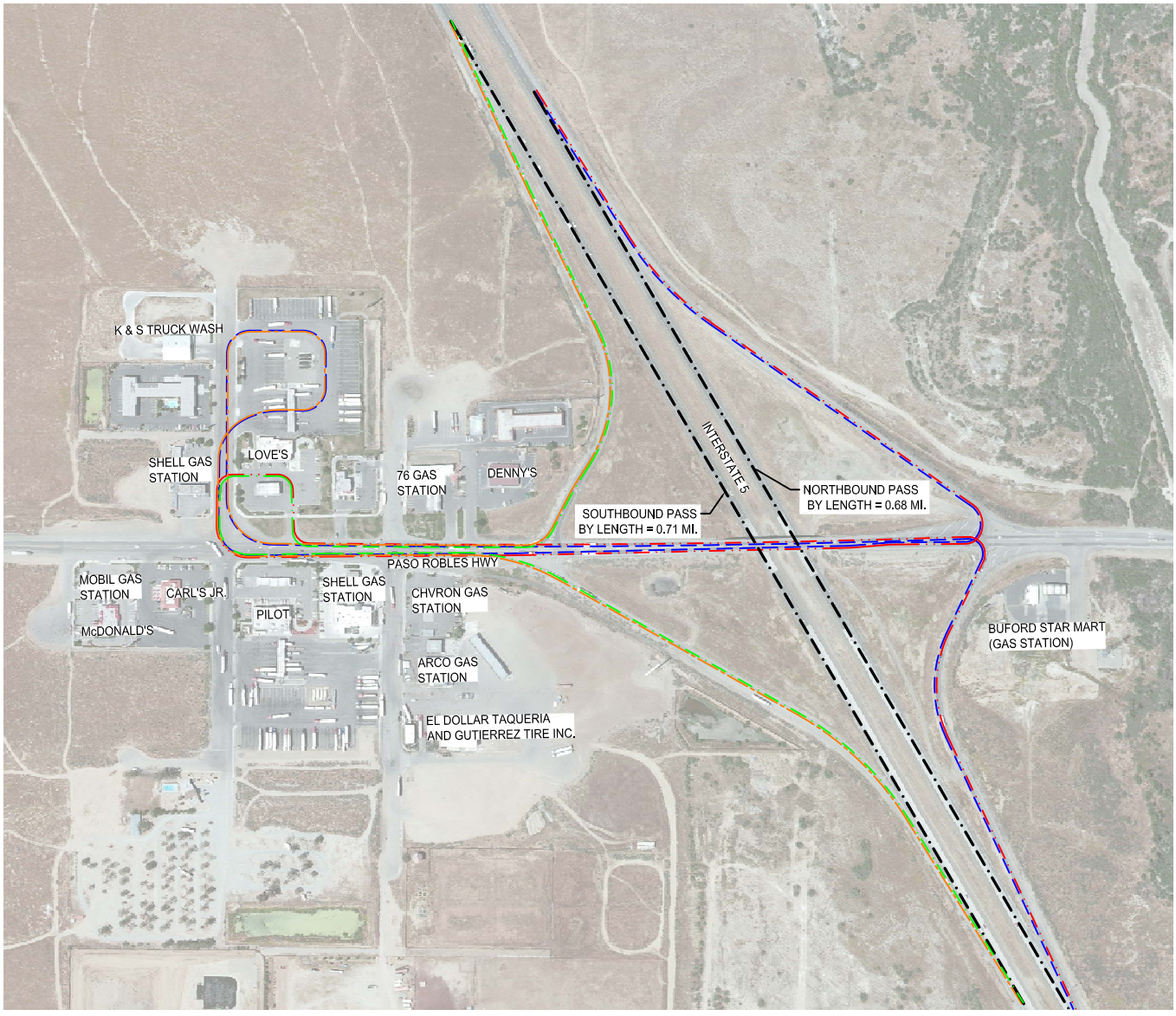
LODI TRAVEL STOP DIVERTED LINK TRIP LENGTHS

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NOTES:

1. SUBTRACT THE PASS BY LENGTH FROM THE GROSS DIVERTED LINK ROUNDTRIP LENGTH TO OBTAIN THE NET DIVERTED LINK ROUNDTRIP LENGTH.
2. DIVIDE THE DIVERTED LINK ROUNDTRIP LENGTH BY 2 TO OBTAIN THE DIVERTED LINK TRIP LENGTH.

LEGEND:

NORTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.77 MI. (NET = 1.19 MI.)
NORTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.89 MI. (NET = 0.60 MI.)

NORTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 2.04 MI. (NET = 1.36 MI.)
NORTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 1.02 MI. (NET = 0.68 MI.)

SOUTHBOUND AUTO GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.26 MI. (NET = 0.55 MI.)
SOUTHBOUND AUTO GROSS DIVERTED LINK TRIP LENGTH = 0.63 MI. (NET = 0.28 MI.)

SOUTHBOUND TRUCK GROSS DIVERTED LINK ROUNDTRIP LENGTH = 1.52 MI. (NET = 0.81 MI.)
SOUTHBOUND TRUCK GROSS DIVERTED LINK TRIP LENGTH = 0.76 MI. (NET = 0.41 MI.)

LOST HILLS TRAVEL STOP DIVERTED LINK TRIP LENGTHS

Appendix C: Existing Plus Project Conditions Technical Calculations

Intersection: 1: SR 36 & Sklyline Road/Skyline Road

Movement	EB	EB	WB	WB	NB	NB	NB	SB	SB	SB
Directions Served	L	TR	LT	R	L	T	R	L	T	R
Maximum Queue (ft)	176	95	110	21	190	336	58	22	255	83
Average Queue (ft)	66	33	36	3	64	154	20	1	117	33
95th Queue (ft)	136	78	87	14	137	278	46	11	209	76
Link Distance (ft)		724	1953			1654			1796	
Upstream Blk Time (%)										
Queuing Penalty (veh)										
Storage Bay Dist (ft)	600			275	300		495	310		300
Storage Blk Time (%)						1			0	
Queuing Penalty (veh)						1			0	

Intersection: 1: SR 36 & Sklyline Road/Skyline Road

Movement	EB	EB	WB	WB	NB	NB	NB	SB	SB	SB
Directions Served	L	TR	LT	R	L	T	R	L	T	R
Maximum Queue (ft)	154	125	125	15	166	286	53	81	514	267
Average Queue (ft)	56	43	40	1	55	124	12	9	237	45
95th Queue (ft)	122	96	91	7	123	231	39	64	432	176
Link Distance (ft)		724	1953			1654			1796	
Upstream Blk Time (%)										
Queuing Penalty (veh)										
Storage Bay Dist (ft)	600			275	300		495	310		300
Storage Blk Time (%)						0			5	
Queuing Penalty (veh)						0			4	

Intersection: 1: SR 36 & Sklyline Road/Skyline Road

Movement	EB	EB	WB	WB	NB	NB	NB	SB	SB	SB
Directions Served	L	TR	L	TR	L	T	R	L	T	R
Maximum Queue (ft)	197	89	95	67	234	364	51	16	232	76
Average Queue (ft)	64	32	31	12	67	136	20	1	102	29
95th Queue (ft)	146	76	71	44	152	265	44	7	191	72
Link Distance (ft)		724		1952		1654			1796	
Upstream Blk Time (%)										
Queuing Penalty (veh)										
Storage Bay Dist (ft)	600		275		300		495	310		300
Storage Blk Time (%)						1			0	
Queuing Penalty (veh)						1			0	

Intersection: 1: SR 36 & Sklyline Road/Skyline Road

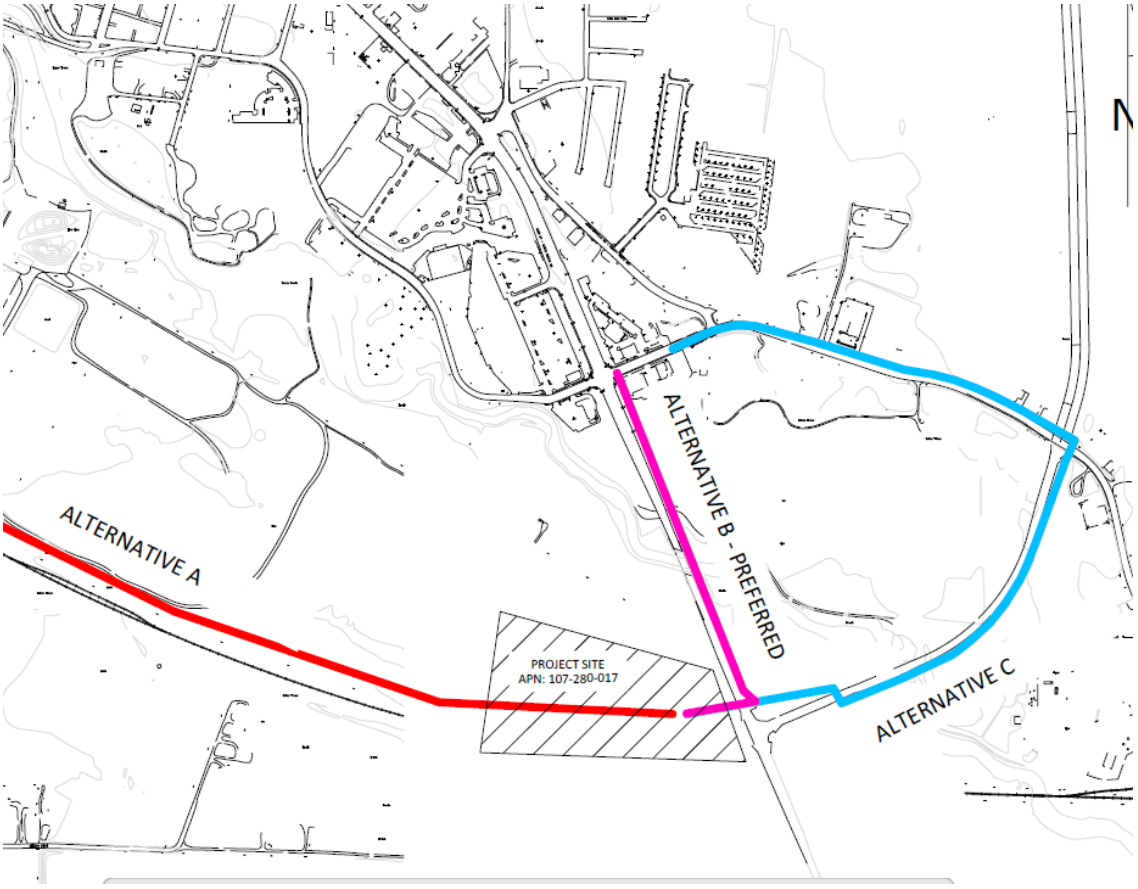
Movement	EB	EB	WB	WB	NB	NB	NB	SB	SB	SB
Directions Served	L	TR	L	TR	L	T	R	L	T	R
Maximum Queue (ft)	148	132	101	61	162	247	53	26	438	202
Average Queue (ft)	54	46	34	10	55	112	13	4	201	42
95th Queue (ft)	115	103	76	39	125	209	40	17	389	150
Link Distance (ft)		724		1952		1654			1796	
Upstream Blk Time (%)										
Queuing Penalty (veh)										
Storage Bay Dist (ft)	600		275		300		495	310		300
Storage Blk Time (%)						0			3	
Queuing Penalty (veh)						0			2	

Attachment A

Sanitary Sewer Service Alternatives
Analysis Report

SANITARY SEWER SERVICE
ALTERNATIVES ANALYSIS REPORT

Project: Susanville Travel Stop Project
Lead Agency: City of Susanville
Date: 10/15/2025



PREPARED BY: _____
Dan Newton, City Engineer

DATE: 10/15/2025

REGISTERED PROFESSIONAL ENGINEER
DAN A. NEWTON
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Exp. 6-30-25
CIVIL
STATE OF CALIFORNIA

1.0 Introduction

This report presents an analysis of viable alternatives for wastewater management associated with a proposed development located within the City of Susanville's sphere of influence, contiguous to the city and Susanville Sanitary District (SSD) boundary. The City serves as the designated lead agency, necessitating annexation into the City's jurisdictional limits. The SSD will annex the parcel into its designated service boundary. A Draft Environmental Impact Report (EIR) has undergone administrative review, and the preliminary findings indicate that none of the pipeline conveyance alternatives under consideration are anticipated to generate significant adverse environmental effects.

2.0 Alternatives Considered

The following alternatives were evaluated for this project:

- Alternative A: Wastewater conveyance via pipeline to the west along abandoned rail corridor
- Alternative B: Wastewater conveyance via pipeline to the north along Hwy 36 (Preferred)
- Alternative C: Wastewater conveyance via pipeline to the east along Skyline Extension
- Alternative D: On-site wastewater treatment system
- Alternative E: No build alternative

3.0 Analysis of Alternatives

3.1 Alternative A: Wastewater conveyance via pipeline to the west along abandoned rail corridor.

- **General Description:** This alternative involves the installation of a gravity sewer pipeline extending westward along the existing rail corridor to facilitate connection to the regional SSD wastewater collection infrastructure.

- **Alignment Description:** Beginning at the SW corner of APN:107-280-017 and traveling West toward the city limits along the northerly line of the abandoned railroad corridor. The sewer line would travel approximately 6200 feet then connect to a Susanville Sanitary District sewer manhole.

- **Advantages:** Avoids the need for a river crossing.
- **Disadvantages:**
    - Substantial pipeline length required, resulting in significant capital expenditure related to materials, excavation, and installation.
    - Incompatibility with the proposed annexation boundary, potentially creating logistical challenges for future infrastructure development and maintenance.
    - Absence of a dedicated public right-of-way within the rail corridor necessitates complex easement negotiations with the rail operator, introducing potential delays and increased project costs.
- **Conclusion:** This alternative is economically and logistically unfeasible due to excessive pipeline length and right-of-way acquisition complexities.

3.2 Alternative B: Wastewater conveyance via pipeline to the north along Hwy 36 (Preferred)

- **Description:** This alternative involves the installation of a gravity sewer pipeline extending northward along the Hwy 36 corridor to facilitate connection to the regional SSD wastewater collection infrastructure.

- **Alignment Description**: Beginning at the NE corner of APN: 107-280-017 and traveling NW within the SR 36 corridor, the sewer line will cross the Susan River by hanging on the downstream side of the existing CalTrans Susan River Bridge 7-33. A distance of approximately 2,500 feet.

- **Advantages:**
    - Minimizes pipeline length, thereby reducing capital expenditure.
    - Utilizes existing right-of-way within the Hwy 36 corridor, simplifying construction logistics and minimizing land acquisition requirements.
    - Facilitates the proposed annexation by aligning with the City's long-term infrastructure planning objectives.
- **Disadvantages:**
    - Requires the construction of a new river crossing, requiring complex permitting process through California Department of Transportation.
- **Conclusion:** This alternative is deemed the most technically and economically viable option due to its shorter pipeline length, utilization of existing right-of-way, and compatibility with annexation objectives. The environmental impacts

associated with the river crossing are considered manageable through appropriate mitigation.

3.3 Alternative C: Wastewater Conveyance via Gravity Sewer to the East along Skyline Extension

- **Description:** This alternative involves the installation of a gravity sewer pipeline extending eastward along the Skyline Extension to facilitate connection to the regional SSD wastewater collection infrastructure.

  Alignment Description: Beginning at the SE corner of APN: 107-280-017 and traveling NE crossing the SR 36 corridor, the sewer line will travel along the Easterly line of the Skyline Extension crossing the Susan River by hanging on the downstream side of the existing Lassen County Susan River Bridge. The sewer line would run to the city limits to Johnstonville Rd., then travel along the Johnstonville Rd. corridor in the city of Susanville R/W to Riverside Drive Extension and tie into the existing manhole near San Francisco St. A distance of approximately 5,500 feet.

- **Advantages:**
  - Potential for co-location of the sewer line with planned extensions of water and natural gas utility infrastructure, offering opportunities for cost-sharing and streamlined construction.
- **Disadvantages:**
  - Substantial pipeline length required, resulting in significant capital expenditure.
  - Necessitates the construction of a new river crossing, requiring complex permitting process through California Department of Transportation.
  - Incompatibility with the proposed annexation boundary.

- **Conclusion:** This alternative is economically prohibitive due to the extensive pipeline length and presents environmental challenges associated with the river crossing.

3.4 Alternative D: On-site wastewater treatment system

- **Description:** This alternative entails the deployment of an individual, decentralized wastewater treatment system on the project site. This could include various technologies such as a conventional septic tank with a subsurface leach field.

- **Advantages:** May provide a degree of operational independence.
- **Disadvantages:**
    - City Code Section 8.16.020 expressly prohibits the installation of private sewage disposal systems, reflecting a municipal policy preference for centralized wastewater treatment.
    - Inconsistent with the proposed annexation, which typically favors integrated infrastructure planning.
    - Potential for long-term operational and maintenance challenges, including effluent quality degradation, soil clogging, and the need for periodic system rehabilitation or replacement.
    - Environmental risks are associated with potential system failures, including groundwater contamination with nitrates, pathogens, and pharmaceuticals.
- **Conclusion:** This alternative is deemed infeasible due to existing City code restrictions and potential long-term environmental liabilities.

3.5 Alternative E: No Build Alternative

- **Description:** This alternative entails the cancellation of the proposed development project.
- **Advantages:** Eliminates initial construction costs and associated environmental disturbance.
- **Disadvantages:**
    - Precludes the realization of potential tax revenue for the City of Susanville.
    - Fails to address the existing deficiency in truck staging capacity during weather-related closures of SR-36, potentially exacerbating safety risks.
    - Forgoes the potential public benefits associated with the project.
- **Conclusion:** This alternative is considered undesirable as it negates the project's potential economic and state highway operational contributions.

4.0 Environmental Considerations

The Draft EIR determined that none of the pipeline conveyance alternatives would result in significant adverse environmental effects.

The California Department of Fish and Wildlife has unofficially opined, via verbal conversation with City Engineer, that a stream bed alteration permit will most likely not be required if the pipeline is hung from the bridge. However, boring under the

Susan River streambed would be deemed a stream bed alteration, thus requiring a permit.

5.0 Economic and Operational Benefits

The proposed project is anticipated to generate incremental tax revenue for the City, supporting essential public services. Furthermore, the provision of designated truck staging areas during SR-36 closures will enhance public safety and improve traffic management.

6.0 Conclusion and Recommendation

Based on the technical, economic, and environmental evaluation presented herein, Alternative B: Wastewater Conveyance via sewer pipeline to the north along Hwy 36 is the preferred alternative.

ALTERNATIVE A

ALTERNATIVE B - PREFERRED

ALTERNATIVE C

PROJECT SITE
APN: 107-280-017

N

SUSANVILLE TRAVEL STOP
SEWER PIPELINE
ALTERNATIVE ANALYSIS

REGISTERED PROFESSIONAL ENGINEER
DAN A. NEWTON
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Exp. 6-30-25
CIVIL
STATE OF CALIFORNIA

DATE: 10/15/2025

SCALE: 1 INCH = 600 FEET