



PLANNING AND BUILDING DEPARTMENT Mages

PLANNING DIVISION

http://www.planning.building@edcgov.us

PLACERVILLE OFFICE:

2850 Fairlane Court, Placerville, CA 95667

BUILDING (530) 621-5315 / (530) 622-1708 Fax

bldqdept@edcgov.us

(530) 621-5355 / (530) 642-0508 Fax

planning@edcgov.us

Planning Commission

Agenda of:

(530) 542-9082 Fax

LAKE TAHOE OFFICE:

924 B Emerald Bay Road South Lake Tahoe, CA 96150

May 14, 2020

FROM:

TO:

Tom Purciel, Associate Planner

Item No .:

No.: 2

DATE:

May 8, 2020

RE:

CUP19-0011/DR-R19-0005/Fast Freddy's Lube Express Expansion;

Additional Parking Analysis

In response to Planning Commission concerns regarding off-street parking, including specific questions regarding potential parking impacts of the proposed change of use, intensities of auto services and repair as related to parking requirements and available off-street parking for the Gold Harvest Market commercial development as a whole, staff provides the following supplemental off-street parking analysis as requested by the Planning Commission during the public hearing on April 9, 2020. Chapter 130.35 of the Zoning Ordinance (Off-Street Parking and Loading) provides different approaches to determine the required parking for a development. These approaches include:

- 1) Calculating parking based on an integrated neighborhood shopping center;
- 2) Calculating parking for individual uses with shared parking, and
- 3) Calculating parking for individual uses.

Chapter 130.35 parking approaches are discussed below, including staff's recommended approach for determining the required parking for the proposed Fast Freddy's Tenant Improvement (T.I.), located within the existing commercial center collectively called the Gold Harvest Market development. To assist staff and the applicant with determining the current count of available parking spaces and current uses at each tenant space, staff requested additional information from the applicant's Traffic Engineer. That information is included in the Traffic Engineer's revised On Site Transportation Review (OSTR), submitted on May 5, 2020 (Attachment 1).

Background on Gold Harvest Market Development and Fast Freddy's Tenant Space:

As also discussed in the project staff report, the Gold Harvest Market development was constructed between approximately 1986 and 1996. From inception, this development was considered to be an integrated development with all buildings and uses sharing common parking areas. Currently, there are 75 parking spaces serving all uses at the development. Current uses include retail/offices, a grocery store/deli, restaurants, a dry cleaner, automotive service and a fuel canopy with 8 fuel pumps. For site details, including a recent parking tally of the Gold Harvest Market development, refer to the attached annotated aerial photo (Attachment 2). The

Gold Harvest Market development also contains many other elements typical of an integrated shopping center including shared landscaping areas, shared signage, common interior drive aisles and two shared entrances/exits onto Mother Lode Drive. The Fast Freddy's expansion would occupy an adjacent tenant space previously used as a retail store. As shown on Table 1 below (Chapter 130.35 Approaches to Off-Street Parking - Fast Freddy's T.I. (1,550 sf)], parking requirements for the proposed expansion, regardless of calculation approach used, would be virtually identical to the parking requirements for the previous retail tenant.

Approach No. 1: Parking Calculations For a Neighborhood Shopping Center (Recommended Approach):

This approach allows for calculating shared parking for "a group of commercial establishments planned, developed, owned or managed as a unit with common off-street parking provided on the site" (El Dorado County General Plan Glossary: "Shopping Center", July 2004, p. 251). Following this approach, parking requirements for the Gold Harvest Market development are reviewed under shared parking for a shopping center. Based on the size of a shopping center (Neighborhood, Community or Regional), Table 130.35.030.1 (Schedule of Off-Street Vehicle Parking Requirements) provides a shared parking calculation based on the Gross Floor Area (GFA), in square feet, of all buildings in the center. As all buildings within the Golden Harvest Market total less than 15,000 square feet of GFA, the project site is considered a Neighborhood Shopping Center, and therefore, requires 1 parking space for every 300 square feet of GFA. Under this approach, the shopping center buildings total approximately 14,280 square feet of GFA and, therefore, the commercial site requires 49 parking spaces to accommodate all uses. With the removal of three existing parking spaces to allow vehicular access to the new service bays, there will be 72 parking spaces available on site. Under this approach, there would be a surplus of 23 parking spaces. Parking requirements for this approach are shown on Tables 1 and 2 below.

<u>Discussion</u>: This approach is how staff typically analyzes parking for integrated development projects. This ratio collectively balances the needs of all current and future uses/tenants. Further, this ratio for a neighborhood shopping center provides a reasonable average parking space requirement without "extremes" (ie. high and low) of parking as users change, since future use of the commercial buildings cannot be accurately predicted. Under this approach, more intensive uses are balanced with less intensive uses sharing the same parking areas.

Approach No. 2: Parking Calculations For Individual Uses With Shared Parking:

Under Section 130.35.030.C (Combined Uses), parking requirements for individual uses or activities on a single site may also be calculated based on standards for shared parking. Shared parking requirements are calculated based on differing hours of use and peak traffic periods on both weekdays and weekends. The default method of calculating shared parking is provided in Table 4.4.A of the adopted Community Design Standards for Parking and Loading (Calculating Shared Parking by Use Types [in percents]). Under this approach, there are differing parking requirements based on existing uses and the time of day. The two use types on site, as listed in Table 4.4.A, are Retail/Service and Restaurant. Parking requirements for this approach are also shown in Tables 1 and 2 below.

<u>Discussion</u>: This ratio is based on a general estimate of parking intensity (in percent) for broad

use categories (e.g. retail/service or restaurant) during predetermined times of day (e.g. 8:00am-6:00pm). This approach may be beneficial in circumstances where long-term uses at a commercial location can be reasonably predicted. However, because shared parking calculations are limited to general categories of use and fixed times of day, this approach may not holistically balance the needs of future uses/tenants, as uses are likely to change over time. In addition, Section 4.4.B.3.a of the Parking and Loading Standards states that Table 4.4.A is only the "default" method of shared parking calculation. Variations to the ratios provided in Table 4.4.A may be warranted based on the unique needs of the site.

Approach No. 3: Parking Requirements by Individual Uses:

Under this approach, the total off-street parking requirement is determined based on the existing floor area of each separate use as shown in Table 130.35.030.1 (Schedule of Off-Street Vehicle Parking Requirements).

<u>Discussion</u>: While this approach may be beneficial to account for highly specific parking needs of a particular establishment (e.g. the Gold Harvest Market), this approach requires a detailed calculation of current floor area of all existing uses within each commercial building on site. As also noted with Approach 2, this approach may not holistically balance the needs of future uses/tenants as uses change over time. Under this approach, any change of use within any of the commercial buildings requires a detailed re-calculation of parking requirements for the entire development. Parking requirements for this approach are also shown on Tables 1 and 2 below.

Other Considerations:

<u>Fuel station parking</u>: Since the 2015 comprehensive Zoning Ordinance Update (ZOU), no new fueling stations have been approved to date. However, many fuel station projects were approved prior to 2015 under the previous Zoning Ordinance. Previous parking regulations were similar to the existing parking regulations of Chapter 130.35, including the use of similar language for auto repair and service. Prior to 2015, the Schedule of off street vehicle parking requirements (formerly Chapter 17.18.060 of County Code) included the following:

Commercial (Use):

7. Auto repair, auto parts sales and auto service stations 1 space for each 300 square feet of retail space and office area plus 3 spaces for each service bay

As fuel pumps were not considered as retail space, office space or service bays under the previous ordinance, no additional parking spaces were required for fuel pumps. At sites for new fuel stations, additional parking spaces were only required for other uses associated with the proposed fuel stations, including retail space and office areas (e.g. convenience stores). Projects with associated fuel stations reviewed and approved by Planning Department staff under the previous ordinance include the 2014 Green Valley Convenience Center (PD12-0003) and the 2000 Shingle Springs 76 Station and convenience store to the southwest of the project site (DR00-0011). Although both of these projects were for fuel station/convenience store uses only, and not part of integrated developments, both projects demonstrate how parking for fuel sales was determined under the previous ordinance.

Under the current ordinance, the parking requirement for "vehicle fuel sales" is unclear. Table

CUP19-0011/DR-R19-0005/Fast Freddy's Lube Express Expansion Planning Commission/May 14, 2020 Staff Memo/May 8, 2020 Page 4

130.35.030.1 includes the use type "vehicle fuel sales", on the same line as "automobile repair and service" including the requirement of: "3 (spaces) per service bay, plus 1 (space) per 400 sf office/retail AUA (Active Use Area)". Similar to the previous ordinance, this table does not provide a specific parking requirement for fuel pumps. For example, when read literally, a fuel pump is not generally considered as a "service bay", nor office/retail AUA. As there is no automotive service or office/retail AUA at the fuel pumps themselves, staff believes there is no specific parking requirement for fuel pumps.

Intensities of Automotive Repair and Service: Under the existing ordinance, including Table 130.35.030.1, there is no difference in parking requirements between short-term and long-term auto service and repair. For example, many routine automotive services or repairs, such as those proposed by the applicant, (e.g. oil changes, lubes, minor part replacement, etc.) would be completed during the same day. However, other businesses with significant automotive repairs (e.g. engine or transmission repair, etc.) may require vehicles under repair to be stored outside, which could impact available off-street parking spaces. In this case, only minor auto service/repair is proposed which would allow for a quick turnaround of vehicles being serviced, and therefore, have a minimal impact on existing off-street parking.

Result of Removing Three Parking Spaces for the Proposed Expansion: The project proposes to remove three existing parking spaces for access to the new service bays. Therefore, staff applied the above parking approaches to the entire development, less the three parking spaces to be removed for the project, in order to demonstrate adequate parking will remain for the balance of the Gold Harvest Market center. Parking tallies for the entire center (Table 2) include the removal of these three spaces and available parking spaces are noted as "post-project."

Conclusion and Recommendation

Based on the above analysis, staff recommends the Planning Commission make a determination that off-street parking is adequate to serve both the project site and the Gold Harvest Market development as a whole based on applicable provisions of Chapter 130.35.

Staff also recommends the Commission select Approach 1 as the most appropriate and applicable criteria in determining the required parking spaces. From its inception, the Gold Harvest Market development was considered and operated as an integrated development with all buildings and uses planned, developed, owned and managed as a unit with common off-street parking. The Gold Harvest Market development contains important elements typical of all other integrated shopping centers including a diverse mix of uses, shared landscaping areas, shared signage, common interior drive aisles, common loading areas and two shared entrances/exits onto Mother Lode Drive. Based on development history, both Approaches 2 and 3, analyzing parking based on individual uses or use ratios at a specified time of day, would not be appropriate to this proposed conversion/expansion and would not provide the same flexibility in meeting parking demand as uses change over time.

As an alternative, the Commission could select Approach 2, as this approach also addresses shared parking. However, as this approach determines shared parking needs based on broad use categories and time of day, parking requirements under Approach 2 range widely from as little as 36 parking spaces (weekday 8am-6pm) to as many as 64 spaces (weekend 8am-6pm). However, due to this wide range, this approach is not recommended as it may not collectively balance the

parking needs of the commercial center.

Table 1. Chapter 130.35 Approaches to Off-Street Parking - Fast Freddy's T.I. (1,550 sf)

Neighborhood Shopping Center (<15K sf)	Individual Uses w/Shared Parking (Table 4.4.A of adopted Parking and Loading Standards)		Individual Uses (Table 130.35.030.1)		
1/300 sf of GFA	Shared Parking (Retail/Service Uses)			3 per service bay; plus 1 per 400 sf. of office/retail AUA. (Note: Office located in existing business – no additional office area proposed)	
	Weekday 8am-6pm	Weekday 6pm-12am	Weekend 8am-6pm		
5 Spaces	4 Spaces (60% Useage)	5 Spaces (90% Useage)	6 Spaces (100% Useage)	6 Spaces	
Park	ing Requiremen	nt for Previous	Retail Use (Sa	me T.I. Location):	
1/300 sf of GFA	Shared Parking (Retail/Service Uses)		Retail Sales and Service - General Indoor (1/300 sf AUA, plus 1/600 sf of storage area)		
5 Spaces	Weekday 8am-6pm	Weekday 6pm-12am	Weekend 8am-6pm	6 Spaces	
	4 Spaces (60% Useage)	5 Spaces (90% Useage)	6 Spaces (100% Useage)		
	8)	Net Cha	inge		
None	None	None	None	None	

Table 2. Chapter 130.35 Approaches to Off-Street Parking - Gold Harvest Market Development

	Approach 1 (Neighborhood Shopping Center)	Approach 2 (Individual Uses With Shared Parking)		Approach 3 (Parking Requirements by Individual Uses)	
Existing On-Site Parking Spaces (post-project)	72				
Spaces Required	49	Weekday 8am-6pm	Weekday 6pm-12am	Weekend 8am-6pm	64
		36	55	64	
Surplus/Deficit	(+23)	(+36)	(+17)	(+8)	(+8)
Calculation Method	1 Space/300 sf GFA	Calculated by use types and percents based on time of day (Table 4.4.A of adopted Parking and Loading Standards)		Parking calculation for each separate use (Table 130.35.030.1)	

CUP19-0011/DR-R19-0005/Fast Freddy's Lube Express Expansion Planning Commission/May 14, 2020 Staff Memo/May 8, 2020 Page 6

Attachments:

- 1. Revised On Site Transportation Review (OSTR), May 5, 2020
- 2. Annotated Aerial Photo

KD Anderson & Associates, Inc.

Transportation Engineers

May 5, 2020

Mr. James Doran **DORAN ENTERPRISES LLC** 4068 Mother Lode Drive, Suite E El Dorado Hills, CA 95682

RE: ON-SITE TRANSPORTATION REVIEW FOR 4041 MOTHER LODE DRIVE (FAST FREDDYS LUBE EXPRESS EXPANSION), SHINGLE SPRINGS, EL DORADO COUNTY

Dear Mr. Doran:

KD Anderson & Associates, Inc. has prepared this analysis for your retail site at 4041 Mother Lode Drive in Shingle Springs in El Dorado County. The site is located in the northeast quadrant of the South Shingle Springs Road / Mother Lode Drive intersection, adjacent to the US 50 / Shingle Springs Road interchange (Figure 1). The property consists of about 14,600 square feet of various retail uses including the following:

- a convenience store with an eight-fueling position gas station
- dry cleaners
- three walk-in restaurants without drive-through
- smog inspection and quick lubrication shop
- a drive-through car wash

The smog inspection and quick lubrication shop, Fast Freddys Lube Express, is proposing to expand their auto repair business from about 3,230 square feet with three service bays, to about 4,780 square feet, and five service bays, an increase of about 1,550 square feet. The project will use the vacant space on the west side of the easternmost building (Figure 1 attached). These additional service bays will have storefront access, similar to two of the three existing service bays. Access for the fifth service bay is provided at the back of the building. There are no plans to have 'drive-through' capabilities.

Technical Approach

El Dorado County requires an On-Site Transportation Review (OSTR) on all projects. The eight tasks that are part of the OSTR are identified and listed below; however, not all tasks are required depending on the site usage.

- Existence of any current traffic problems in the local area such as a high-accident location, nonstandard intersection or roadway, or an intersection in need of a traffic signal.
- 2. Proximity of proposed site driveway(s) to other driveways or intersections.
- Adequacy of vehicle parking relative to both the anticipated demand and zoning code requirements.
- Adequacy of the project site design to fully satisfy truck loading demand on-site, when the anticipated number of deliveries and service calls may exceed 10 per day.

3853 Taylor Road, Suite G • Loomis, CA 95650 • (916) 660-1555 • FAX (916)660-1535

Mr. James Doran **DORAN ENTERPRISES LLC** May 5, 2020 Page 2

- Adequacy of the project site design to provide at least a 25' minimum required throat depth (MRTD) at project driveways. Include calculation of the MRTD.
- 6. Adequacy of the project site design to convey all vehicle types.
- 7. Adequacy of sight distance on-site.
- 8. Queuing analysis of "drive-through" facilities.

Existing Roadways

Mother Lode Drive provides access to the project driveway. Mother Lode Drive provides access to S. Shingle Road and US 50 from the west. There are two driveways to the retail site, one about 250 feet east of the S. Single Road intersection and the second about 360 feet from the intersection. A 60-foot long left turn lane is available for turning traffic into the westerly driveway; this driveway is used primarily for the convenience store / gas station and the retail businesses in the westerly building. The easterly driveway provides primary access to the project building and the car wash. Opposite the project driveway is a driveway used to access various businesses between Mother Lode Drive and Sunset Lane. The outbound lane is angled towards eastbound Mother Lode Drive; however, there is no signage prohibiting left turns towards S. Shingle Road. A two-way left turn lane (TWLTL) allows vehicles to enter and exit both driveways outside of the through travel lane.

On-Site Transportation Review

1. Existence of any current traffic problems in the local area such as a high-accident location, non-standard intersection or roadway, or an intersection in need of a traffic signal.

SWITRS crash data through the California Highway Patrol (CHP) database was reviewed for the previous five-year period, 2014 – 2018 to determine whether there is any history of crashes in the driveway vicinity. One reported collision occurred at the easterly project driveway and involved a vehicle not yielding the right-of-way to an opposing vehicle while turning. Four other crashes have occurred along Mother Lode Drive between S. Shingle Road and Sunset Lane; however, none occurred at either of the site driveways.

2. Proximity of proposed site driveway(s) to other driveways or intersections.

As noted earlier a driveway opposite the easterly driveway exists. Additionally, there is a driveway on the south side of Mother Lode Drive and about 150 feet west of the westerly driveway. The driveway provides access to a Unocal gas station. The driveway provides right-in, right-out access only. About 250 feet east of the easterly driveway is a driveway on the north side of Mother Lode Drive providing access to an office building.

3. Adequacy of vehicle parking relative to both the anticipated demand and zoning code requirements.

Chapter 130.35 of the County's zoning code identifies off-street parking requirements for various land use types. Parking for the overall site was reviewed to compare existing and proposed parking and to assure conformance to County requirements. Parking requirements were developed based on the existing uses and the land uses found in the zoning code.



Mr. James Doran DORAN ENTERPRISES LLC May 5, 2020 Page 3

There are multiple methods available to calculate the required parking on this site. The site can be analyzed entirely as a neighborhood retail center or separated by retail use. The methods considered are presented in Tables 1 and 2.

Additionally, parking space requirements identified in the County Code, when considered literally, result in some uses requiring no parking. That may not be entirely inaccurate. For example, a gas station does not have service bays unless they provide automobile repairs. A fueling position is not a service bay. The El Dorado County Planning Code does not define the term 'service bay'. Planning codes were reviewed to determine how other public agencies define 'service bay'. Most referred to service bays relative to auto repair uses. One planning code, from Defiance, Ohio, identified the following parking requirements for automobile fuel sales:

1.0 space per 300 square feet of indoor sales area plus 1.0 space per fuel pump or service bay (service bay may not be counted as a parking space)

This definition identifies a parking space for each fueling position. In other words, each fueling position is a parking space. The service bay may be for any gas stations that may perform ancillary work, such as smog checks. Based on this definition for this site, the gas station would not require additional parking beyond the number of fueling positions.

Table 1 presents the required parking considering the entire site as a neighborhood retail center. Under this scenario, 49 parking stalls are required, and 75 stalls are available. With the additional service bays added, three spaces will be removed, leaving a total parking surplus of 23 spaces.

Table 2 presents the scenario where each retail use is considered separately, and parking is calculated independently for each use. Under this scenario, 64 parking stalls are required under existing conditions and under the proposed condition, with 75 stalls available. With the additional service bays added, three spaces will be removed, leaving a total parking surplus of 8 spaces.

Under each scenario the site parking facilities will remain adequate.

	TABLE 1 IG REQUIREMENTS PER ZONIN IGHBORHOOD SHOPPING CEN		
Use Type	Parking Space Requirement	Size	Parking Required
Neighborhood Shopping Center (Entire Site)	1 per 300 sf	14,600 sf	49
To	tal Stalls Required (Neighborhood S	Shopping Center)	49
Total Parking Available			75†
Net Surplus (Proposed Condition as Neighborhood Shopping Center)		26	
	Existing Parki	ing to be Removed	(3)
Total Surplus (Proposed Condition as Neighborhood Shopping Center)		23	

sf - square feet



^{2* -} required parking accounted for in drive-through lane.

^{† -} total site parking stalls = 75 spaces; includes 2 stalls in drive-through lane of car wash

Mr. James Doran DORAN ENTERPRISES LLC May 5, 2020 Page 4

TABLE 2 PARKING REQUIREMENTS PER ZONING CODE PARKING FOR INDIVIDUAL USES				
Use Type	Parking Space Requirement	Size	Parking Required	
Building 1 (west) Dry Cleaner	1 per 500 sf + 1 / check stand	1,444 sf	4	
Restaurant (BBQ) (full service)	1 per 300 sf + 1 / 2 employees	703 sf	5	
Restaurant (Yogurt) (full service)	1 per 300 sf + 1 / 2 employees	684 sf	5	
Restaurant (Subway) (full service)	1 per 300 sf + 1 / 2 employees	1,349 sf	7	
~~~~ <b>~</b>	1 RV space for every 20 spaces	CATOLOGICA CO	10	
Building 2 (central)				
Gas Station AND	3 per service bay + 1 / 400 sf AUA	0 ‡	0	
Food & Beverage	1 per 200 sf + 1 / check stand +	4,000 sf (sales) 1,000 sf	24	
	1 / 600 sf AUA	(storage)	24	
Building 3 (east) - Existing		(storage)		
Indoor Retail Space (Vacant)	1 per 300 sf	1,548 sf	6	
Auto Repair & Service	3 per service bay +	3 bays	10	
The control of the co	1 / 400 sf AUA			
Building 3 (east) - Proposed				
Auto Repair & Service	3 per service bay +	5 bays	16	
	1 / 400 sf AUA	700300	12029	
Drive –Through Car Wash	2 per stall – 24' of drive-	50'	2*	
	through counts as one stall			
	Total Stalls Required (Ex	xisting Condition)	64	
Total Stall	s Required (Proposed Condition -		64	
		Parking Available	75†	
	Net Surplus (Pro	posed Condition)	11	
	Existing Park	ing to be Removed	(3)	
	Total Surplus (Pro	posed Condition)	8	

AUA - active use area

sf - square feet

◊ - RV space added for 20 total restaurant spaces
 ‡ - ED County does not define parking requirement per fueling position; 0 service bays present and 0 sf of AUA
 2* - required parking accounted for in drive-through lane.

† - total site parking stalls = 75 spaces; includes 2 stalls in drive-through lane of car wash



Mr. James Doran DORAN ENTERPRISES LLC May 5, 2020 Page 5

 Adequacy of the project site design to fully satisfy truck loading demand on-site, when the anticipated number of deliveries and service calls may exceed 10 per day.

The expansion project would not increase the existing truck deliveries, including fuel trucks for the gas station. Review of additional truck access is not required.

Adequacy of the project site design to provide at least a 25' minimum required throat depth (MRTD) at project driveways.

Two existing driveways are present that provide access to and from the site. Review of additional driveway access is not required.

6. Adequacy of the project site design to convey all vehicle types.

The project is an expansion of an existing quick lubrication shop. The largest design vehicle for the site includes fuel trucks for the Chevron gas station located in the center of the site. As this project expands the existing use no additional analysis is needed to accommodate a smaller vehicle.

7. Adequacy of sight distance on-site.

This is an existing driveway providing access to multiple uses. No new circulation around the site will occur with the expansion of the quick lubrication shop. However, the two proposed service bays added to the west side of the building have trees on either side of the bays. During months where the trees have leafed out it is possible that the sight distance for vehicles backing from the service bays may have limited visibility. It is recommended that the trees should be limbed so that the lowest branches are no less than six feet above the pavement. An alternative would be to have a 'walker' assisting when cars are backing from the service bays.

8. Queuing analysis of "drive-through" facilities.

This project does not include drive-through facilities; therefore, a queuing analysis was not completed.

### CONCLUSIONS

The proposed project will expand an existing quick lubrication shop with the addition of two service bays within an existing neighborhood retail shopping center. The project will convert existing vacant retail space adjacent to the existing two service bays. There are no plans to provide 'drive-through' capabilities. The project will remove three existing parking spaces. Under two alternative scenarios the parking requirements indicate that the site will continue to have a surplus of parking with a minimum of 8 stalls.

The only on-site traffic issue noted is the possibility of limited sight distance when vehicles are backed out of the service bays. This would be seasonal when trees on either side of the new service bays have leafed out. It is recommended that the trees should be limbed so that the lowest branches are no less than six feet above the pavement. An alternative would be to have a 'walker' assisting when cars are backing from the service bays.

ACX

Mr. James Doran **DORAN ENTERPRISES LLC** May 5, 2020 Page 6

Should you have any questions, please free to contact me directly at (916) 660-1555. You may also reach me via e-mail at <a href="mailto:jflecker@kdanderson.com">jflecker@kdanderson.com</a>.

Sincerely,

KD Anderson & Associates, Inc.

Jonathan D. Flecker, P.E. Transportation Engineer

Attachment: Figure 1

4041 Mother Lode Dr Fast Freddys Luhe Express OSTR 5-5-20.ltr





