

DEPARTMENT OF TRANSPORTATION

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August 22, 2007

2133 IGR/CEQA
6-KIN-41-40.95
LEPRINO FOODS EXPANSION

Ms. Holly Smyth
Planning Director
City of Lemoore
201 Fox Street
Lemoore, CA 93245

Dear Ms. Smyth:

We have reviewed the Mitigated Negative Declaration for the expansion of Leprino Foods Lemoore West Plant, located on the southwest corner of Belle Haven Drive and Industry Way in the City of Lemoore, Ca. Additional traffic associated with the expansion will be insignificant. Caltrans has the following comments:

The City of Lemoore continues to create a reliance on Belle Haven Drive as a north-south connector between Hanford-Armona Road and Bush Street. Caltrans has asked and continue to seek a parallel, north-south road to minimize dependence on Belle Haven. Expansion of Leprino Foods will force the parallel frontage road to be located further west minimizing its benefit to the Westside community and relegating more traffic to the Bush Street/Belle Haven Dr. intersection. An impact fee schedule for Westside streets and thoroughfares should include a north-south parallel road as a community wide benefit. This, along with improving the State Route (SR) 41/Hanford-Armona Road intersection, should be included in an impact fee program with fair share contributions from Leprino Foods and subsequent development.

Our recommendation for the parallel road is based on the significant and potentially adverse traffic impacts summarized in this TIS for the Mitigated 2030 Project year. The TIS indicates that queues will exceed capacity at many locations affecting the State Highway System and the queues could be longer than projected. This has the potential to create gridlock and excessive waiting time leading to safety concerns. As Bush Street is the only practical means of accessing the Westside, Caltrans remain concerned about the State Highway operations at this location. This concern was expressed with the Wal-Mart TIS and is made manifest in this TIS.

Caltrans remains concerned that insufficient mitigation of cumulative development will result in poor operations and potential safety problems. The City has yet to adequately develop a traffic impact mitigation fee program that addresses future infrastructure needs. As an example, the Westside traffic model shows traffic diversion to the SR-198/ 21st Avenue interchange. This access point has yet to be approved by Caltrans or the California Transportation Commission (CTC) and is not in the current Freeway Agreement. It is listed as unconstrained in the Kings County Regional Transportation Plan (RTP). The cost estimate in the RTP is too low and is not being mitigated for by Westside development. This should be addressed in the

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traffic studies and mitigated per CEQA, and needs to be addressed by City staff as part of development on the Westside. Leprino Foods should be contributing to this interchange and to local roads and State Highway facilities in the greater Westside area.

Growth on the Westside and the diversion of traffic along Hanford-Armona Road brings up the need to establish the long-range plan for the SR-41/Hanford-Armona Road intersection. In general, this location should be upgraded to full freeway with construction of an interchange. It is not in the long-term interest of Caltrans, the motoring public, and the City of Lemoore for this location to remain an at-grade intersection. The City of Lemoore should be working with Kings County Association of Governments (KCAG) to prioritize an interchange at this location. A revised preliminary conceptual design for the interchange is enclosed.

The original development of Leprino Foods occurred without review or input by Caltrans. No traffic studies or mitigation to State facilities occurred when Leprino was originally constructed. Caltrans finds this to be a major issue that should be rectified by implementing a transportation mitigation fee program for the Westside area, which includes mitigation to the State Highway System.

The Proportionate Share Percentage table includes an error at Hanford-Armona Road. The fair share calculation should not use traffic volumes on SR-41 as part of the calculations. As an interregional route, the City of Lemoore will not be able to levy fees on SR-41 users and as such is unable to collect revenue sufficient to fully mitigate this location. Therefore, Caltrans urges the use of the Hanford-Armona Road volumes to define the fair share calculations. For all locations including this one, the truck volumes should be converted to passenger car equivalents (PCE). This is consistent with the Highway Capacity Manual (HCM) and reasonable given the high truck volumes from Leprino Foods. Please revise and resubmit the fair share table.

Given the discrepancies between the Wal-Mart TIS and the Leprino TIS and consistent with the significant interagency coordination associated with the Wal-Mart TIS, Caltrans accepts the results of this TIS only as it pertains to additional traffic from the project and in relationship to the fair share contribution percentages – pursuant to revisions as noted above. The lack of a City traffic impact mitigation fee schedule and a corresponding list of improvements for the Westside is troubling because Caltrans does not know what fees and improvements will be provided as mitigation to the State Highway System and local road network. Please provide a complete and detailed list of projects and fees to be collected for each location (not just the fair share percentage). This would include improvements to SR-41/Hanford-Armona Road, SR-41/Bush Street, SR-41/SR-198, and SR-198/21st Avenue. Alternatively, if the City develops and implements a Westside impact fee schedule, please submit the fair share assessment for Leprino Foods based on this schedule.

It should be noted that the TIS identified the southbound SR-41 to eastbound SR-198 at-grade intersection as failing within the 20 year planning horizon. Westside development is a contributor to this movement as traffic leaves the Westside for Lemoore, Hanford, and beyond. KCAG should be informed that this interchange would need major improvements in the future. Caltrans recommends that the Traffic Impact Mitigation Fee program being developed by the City of Lemoore address impacts to the State Highway System and contain a fair share component for new development.

As stated in previous correspondence to the City regarding development, the State is unable to fund improvements to support development-driven traffic, and the regional State Transportation Improvement

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Program funds are inadequate to fund all necessary improvements. Presently, the impact from development in the City's Westside area represent only a portion of traffic impacts to the SR-41/SR-198 Interchange. As partners and stakeholders in the regional transportation system, it is imperative for KCAG, Caltrans, and the City of Lemoore to explore opportunities to adequately fund the needed improvements to the SR-41/SR-198 Interchange.

Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to Caltrans for review. Also, please provide us the information requested prior to the Planning Commission meeting. Questions related to our comments on the traffic study should be directed to Steve McDonald at (559) 444-2483. If you have any other questions, please call me at (559) 445-5867.

Sincerely,

PAUL-ALBERT MARQUEZ
Central Region Planning
District 6

(Enclosure)

CC:/ Ms. Terri King, Executive Director
Kings County Association of Governments