



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

June 20, 2019

Jennifer K. Clark
City of Fresno, Development and Resource Management
2600 Fresno Street, Third Floor
Fresno, CA 93721

SUBJECT: City of Fresno OAR, Fresno Rendering Plant Relocation DEIR

Dear Ms. Clark:

The County of Fresno appreciates the opportunity to review and comment on the subject Fresno Rendering Plant Relocation Draft Environmental Impact Report that is proposing to expand and relocate an existing rendering facility located on Belgravia Road between Church Avenue and "E" Street to a parcel located south of Jensen Avenue and west of Cornelia Avenue.

The Department of Public Health, Environmental Health Division has requested that the Hazardous Materials section should be revised to address the potential for discovering abandoned underground petroleum storage tank(s) during construction and grading activities. If this occurs, the applicant shall apply for and secure an Underground Storage Tank Removal Permit from the Fresno County Department of Public Health, Environmental Health Division. Similarly, sewage disposal systems may be discovered during construction and grading activities. All sewage disposal systems within the project area shall be properly destroyed under permit and inspection from the City of Fresno, Building and Safety Section.

Additionally, the Department of Public Health requests that revisions to the Hydrology and Water Quality Section be made to address the manner in which existing water wells, both domestic and agricultural, will be handled in areas of the proposed project. Areas served by individual domestic and agricultural wells may provide a conduit to groundwater if not properly protected or destroyed. Improper abandonment of such wells presents a significant risk of contaminating groundwater. For this reason, when development occurs, it is extremely important to ensure the safe and proper destruction of all abandoned water wells.

The Design Division of the Department of Public Works and Planning has reviewed the project and requests that comments from the previous OAR, from when the Fresno Rendering Plant Relocation project was considered for a Mitigated Negative Declaration, be included in the record for the Draft EIR document. To the County's knowledge, those comments from the previous OAR have not been addressed; therefore, comments from the previous OAR request for the Fresno Rendering Plant will still apply. A copy of the aforementioned comments has been enclosed for your review. If studies and documentation exist for the project that address the County's comments, please provide them for review. For more information regarding the comments provided from the Design Division, please contact Brian Spaunhurst at (559) 600-4533 or by email at BSpaunhurst@FresnoCountyCA.gov.

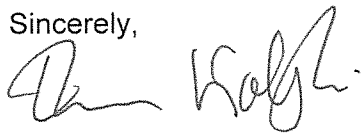
Additionally, the Road Maintenance and Operations Division of the Department of Public Works and Planning has provided comments as listed below.

- A separate Traffic Impact Study (TIS) was included with the draft Environmental Impact Report (EIR). That TIS and the draft EIR referenced significant impact with the cumulative impacts plus project traffic that would reduce the level of service at two intersections to an unacceptable level. These intersections include Jensen/Cornelia and Jensen/Brawley. However, the report indicated that these impacts would not be addressed because the City has not identified any planned or programmed improvements for these intersections, and because the intersections are outside of the City's Sphere of Influence. Therefore, no mitigations are proposed.
- The Road Maintenance and Operations Division recommends that the project's pro-rata shares for the recommended improvements to mitigate the impacts be determined and set aside in a separate trust fund for any future improvements to those intersections at such time in the future that improvements are warranted.

For more information regarding Road Maintenance and Operations Division comments, please contact the Road Maintenance and Operations Division at (559) 600-4240.

If you have any questions, you may e-mail me at TKobayashi@FresnoCountyCA.gov or contact me at (559) 600-4224.

Sincerely,



Thomas Kobayashi, Planner
Development Services and Capital Projects Division

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Enclosure

cc. Bernard Jimenez, Assistant Director
William M. Kettler, Development Services and Capital Projects Division
Chris Motta, Development Services and Capital Projects Division



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

October 9, 2017

Mike Sanchez, AICP, MCRP, Assistant Director
Development and Resource Management
2600 Fresno St. Room 3065
Fresno, CA 93721

SUBJECT: City of Fresno Rendering Plan Relocation Project

Dear Mr. Sanchez,

The County of Fresno appreciates the opportunity to review and comment on the subject Initial Study/Mitigated Negative Declaration (IS/MND). Fresno County requests that the following comments are considered prior to adoption of the MND:

Transportation/Traffic:

It is anticipated that project's operation would use an average of 75 trucks per day, or 150 truck trips per day; total trips projected to generate approximately 273 daily trips. It would typically operate 24 hours per day, 6 to 7 days per week. Two dedicated access points would be provided for the site: Jensen Avenue would serve as the dedicated truck route, and all trucks would access the project site from Jensen Avenue and employees and sales calls would access the site via Cornelia Avenue.

This project impacts Fresno County Roadways and Intersections. Fresno County General Plan Policy TR-A.2 states that:

- The County shall plan and design its roadway system in a manner that strives to meet Level of Service (LOS) D on urban roadways within the spheres of influence of the cities of Fresno and Clovis and LOS C on all other roadways in the county.
- In no case should the County plan for worse than LOS D on rural County roadways, worse than LOS E on urban roadways within the spheres of influence of the cities of Fresno and Clovis, or in cooperation with Caltrans and the Council of Fresno County Governments, plan for worse than LOS E on State highways in the county.

In addition, a project is considered to have a significant impact if its traffic, when added to the traffic of the without-project condition, would cause any of the changes in traffic conditions described below:

- 1) On roadway segments:
 - a) Cause a roadway that is operating at an acceptable LOS to deteriorate to an unacceptable LOS; OR
 - b) Cause the V/C ratio (on a directional peak hour basis) to increase by more than 0.05 on a roadway that is already operating at an unacceptable LOS. It should be

noted that a decrease from an unacceptable LOS to a lesser LOS (e.g. from LOS D to LOS E in County areas) is not considered an impact unless the corresponding V/C ratio increase is greater than 0.05.

- 2) At signalized intersections:
 - a) Cause an intersection that is operating at an acceptable LOS to deteriorate to an unacceptable LOS; OR
 - b) Cause the average delay to increase by more than 5.0 seconds at a signalized intersection that is operating at an unacceptable LOS.
- 3) At unsignalized intersections, including all-way stop, minor approach stop, and roundabouts:
 - a) Cause a movement or approach that is operating at an acceptable LOS to deteriorate to an unacceptable LOS; OR
 - b) Cause the average delay to increase by more than 5.0 seconds on a movement or approach that is operating at an unacceptable LOS. It should be noted that a decrease from an unacceptable LOS to a lesser LOS (e.g. from LOS D to LOS E in County areas) is not considered an impact unless the corresponding delay increase is greater than 5.0 seconds.

Area outside of City Limits/Sphere of Influence is considered a rural setting where the acceptable LOS would be C for the roadways within the County's Jurisdiction. The report should be revised accordingly. The report does not address impacts to the pavement as result of the increased Truck traffic i.e. Traffic Index Analysis. The project is expected to generate a high volume of truck traffic and all of which would travel EB/WB on Jensen Avenue to the project site. Pavement impacts are analyzed based on a comparison of the traffic index with the project to the traffic index without the project. The traffic index is described in detail, and shall be calculated as outlined, in the most recent edition of the Caltrans Highway Design Manual. A 20-year traffic index shall be provided and if the project truck causes the traffic index to be increased by 0.5 or more than the project would cause a significant impact and project would need to mitigate the impact.

County requests the following items:

- Trip Generation - Provide County with justification for the number of truck trip for this type of operations. County staff was not included in any discussions regarding trip generation and distribution
- Traffic Index Analysis on the following road segments: Jensen From East of Marks Avenue to Project Site (west of Cornelia)
- Intersection analysis per County LOS standard
- A left turn analysis on Jensen Avenue at project site access
- A right turn acceleration lane analysis on Jensen at project site access.
- Any modifications to the scope of the project listed above, the traffic impact would need to be revised and County staff should be included in developing the scope of the project since County roadways and intersections are being impacted.
- Since the project impacts County Roadway, County should be included in any discussion related to a fair-share cost for the mitigations identified in the Report.

Intersection/ Mitigation Measure as Identified by the Traffic Study:

1. Jensen Avenue/ Cornelia Avenue (100 % County's Jurisdiction) – Mitigation: Install all-way stop control;
2. Jensen Avenue/ Brawley Avenue (100 % County's Jurisdiction) – Mitigation: Install all-way stop control.

3. Jensen Avenue/ Marks Avenue (100 % County's Jurisdiction) – Mitigations: Install Traffic signal control with protected let-turn phasing and the following lane configurations:
 - One left-turn and a shared through/right-turn lane on the northbound approach;
 - One left-turn lane, one through lane, and one right-turn lane on the southbound approach;
 - One left-turn and a shared through/right-turn lane on the eastbound approach; and
 - One left-turn lane, one through lane, and one right-turn lane on the westbound approach.
4. Jensen Avenue/ West Avenue (25% County's Jurisdiction) – Mitigations: Install Traffic signal control with protected let-turn phasing and the following lane configurations:
 - One left-turn and a shared through/right-turn lane on the northbound approach;
 - One left-turn and a shared through/right-turn lane on the southbound approach;
 - One left-turn lane, one through lane, and a shared through/right-turn lane on the eastbound approach; and
 - One left-turn lane, one through lane, and a shared through/right-turn lane on the westbound approach.

We appreciate the opportunity to comment on the project. If you have any questions, you may e-mail me at cmonfette@co.fresno.ca.us or contact me at (559) 600-4245.

Sincerely,



Christina Monfette, Planner
Development Services Division

CMM:
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c: Bernard Jimenez, Deputy Director of Planning
William M. Kettler, Development Services Division
Chris Motta, Development Services Division
Marianne Mollring, Senior Planner