

California Department of Transportation

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January 10, 2022

1-LAK-29-41.42
Lakeport Hub Project
SCH# 2021120204

Ms. Jenni Byers, Director
Community Development Department
City of Lakeport
225 Park Street
Lakeport, CA 95453

Dear Ms. Byers:

Thank you for giving us the opportunity to comment on the Initial Study and Mitigated Negative Declaration for the proposed Lakeport Hub project, located in the south-west commercial area of Lakeport near the State Highway 29/Todd Road interchange. The project proposes to subdivide the 15.5-acre subject parcel (APN 005-045-15) to nine parcels for the purpose of developing a commercial center that would include a service station, six to eight restaurants, two retail buildings and a 70-room hotel. The property is located at 1842 Todd Road, along a portion of Parallel Drive to the east and Todd Road to the west. We have the following comments:

Please note that the initial study and mitigated negative declaration for the project contains two site plans: one on page 91, and another on page 665. These two site plans do not match. The site plan on page 665 shows truck off-tracking for fuel delivery trucks on Parcel "B," near its junction with parcels "A" and "E," that overlaps parking spaces and landscape islands. The site plan on page 91 shows no conflicts with the designated truck route. We will assume that the site plan on page 91 is the most up to date version, and our following comments will refer to it.

Although not labeled as such, it appears that a bus bay was incorporated into the site plan on Parallel Drive between the two southernmost project driveways. We have sent a courtesy copy of this letter to the Lake Transit Authority to help ensure that dialogue with the local transit operator is incorporated into the project design, etc.

We note that the project plans for pedestrian circulation are limited: not all parcels are connected with sidewalks or other pedestrian pathways. An important consideration for transit users is the accessibility of transit stops, sometimes referred to as the First & Last Mile. The more obstacles a pedestrian encounters between the trip origin or destination and the transit stop, the less convenient the transit service will be. In this case, there is no direct pathway through the project site from the shopping center to the transit stop. Walking from the bus stop on Parallel Drive to the shopping center on Todd Road around the

perimeter of the project site may be an impediment to transit usage. We recommend improving the continuity and efficiency of pedestrian facilities on site.

California has established a goal of becoming Carbon Neutral by the year 2045. To ensure that the project design does not become obsolete with changing travel behavior and patterns, we recommend supporting multiple modes of travel to and from the site. To this end, we request that secure bicycle parking be provided at the businesses on site and that provisions for electric car charging be considered.

The Transportation section of the CEQA checklists makes a finding that the project has a less than significant impact on a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This includes Level of Service standards or policies. Because traffic mitigation is identified for three intersection improvements on Lakeport Boulevard, this finding needs to indicate the project will have less than significant impacts with mitigation incorporated. A less than significant finding would not require mitigation.

We disagree with the finding that there is "No Impact" to emergency access. The changes to the transportation system have the potential to increase emergency response times and should be evaluated under the proposed future scenarios. Until the modeling is performed at the Lakeport Blvd and the Lak 29 NB ramps, SB ramps & Bevins St Intersection include ped phases and queue lengths in the HCM Analyses.

Appendix F: Traffic Impact Study

Section 1.2, 5.4, 7.4 & 9.1 – There appears to be an assumption that signalized intersections are the appropriate improvement for all intersections identified to have operational deficiencies at the build-out of the project. Traffic signals have the potential to diminish the operations of roundabouts when placed in close proximity. There may also be queuing issues associated with installing signals on freeway off-ramps. Before Caltrans can approve the TIS recommendations to install signals, an Intersection Control Evaluation will need to be conducted to show that signals will perform acceptably.

Section 3.2 states that volumes were collected prior to March 13, 2020, which meets to acceptance criteria in policy TOPD 20-04. Further clarification is needed to confirm when the actual date when traffic counts were performed, February 26 or March 12.

Exhibit 2: Text references to Bevins street, recommend adding to exhibit for clarity.

Section 5.0: The section introduction uses unconventional terminology and should be clarified. "Existing" LOS is more difficult to distinguish from "Existing with Project Conditions" LOS. We suggest using the more conventional terminology: "existing plus project conditions," which indicates that the baseline conditions have been modified using project-generated traffic.

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1/10/2022
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Table 5: The ordering and labeling of this table is a potential source of confusion. For example, there are apparently six intersections assigned the same number. Also, the intersection numbers are not consistent with the TIS Intersection diagrams.

Table 6, Table 9 & Appendix 3: Without an analysis of both queue lengths and pedestrian phases for the signalized intersections, the reported conditions may be better than the actual conditions. Before assigning Fair-Share Fees or conducting an Intersection Control Evaluation, both of these factors will need to be analyzed. Also, per the HCM sheets, we question the results indicating that no increase is expected in truck volumes.

Appendix F, Traffic Impact Study, page 659 states: "The City Engineer will ultimately determine the improvements required at off-site intersections." Please note that two of the three impacted intersections identified are located within Caltrans' jurisdiction and will require Caltrans concurrence on the proposed improvements as well as an encroachment permit for construction. We request to work cooperatively with the City Engineer to advance mitigation concepts that are proposed for the State Route 29 ramp intersections.

The Synchro 10 reports show that the Peak Hour Factor (PHF) is the same number for each turning movement at the study intersections. For example, a PHF of 0.95 is used for the Lakeport and NB Ramp for every turning movement. The PHF should be calculated for each turning movement.

Appendix B: Why are pedestrian & bicycle counts not included?

Please contact me with questions or for further assistance with the above comments at (707) 684-6879 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

Jesse G. Robertson

JESSE ROBERTSON
Transportation Planning
District 1 Caltrans

e-copy: State Clearinghouse
Lisa Davey-Bates, Director, Lake Transit Authority