



DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL AIR STATION
700 AVENGER AVENUE
LEMOORE, CALIFORNIA 93246-5001

IN REPLY REFER TO:

11000
Ser N00/0378

SEP 23 2011

Honorable Willard Rodarmel
Mayor
City of Lemoore
119 Fox Street
Lemoore, CA 93245

Dear Mayor Rodarmel:

Thank you for the opportunity to comment on the "City of Lemoore Notice of Preparation of an Environmental Impact Report for the Lemoore Walmart Project." The installation supports smart growth, but is concerned that as proposed, the project may encourage high density residential development beneath a pre-established low level flight corridor, enclosure (1). Of particular concerns to the Navy:

(1) Health and Safety. As proposed, the project is cited adjacent to a pre-established low level Ground Control Approach (GCA) Box. High density residential development exposes Naval Air Station (NAS) Lemoore aircrew and new residents to un-necessary health and safety risks.

(2) Growth inducement. The project may induce high density residential growth in West Lemoore. NAS Lemoore considers residential development with a density greater than two dwelling units per acre incompatible with flight operations.

(3) Noise from Single Exposure Levels (SEL). Per the completed Joint Land Use Study (JLUS), residents will be exposed to SEL levels ranging from 89 decibels to 102 decibels.

NAS Lemoore has continually expressed its concerns over incompatible development underneath its pre-established low level flight corridor. On January 28, 2008 NAS Lemoore submitted comments in regards to the Draft Environmental Impact Report (EIR) for the 2030 Lemoore General Plan (SCH NO. 200608113). The comments addressed the Navy's concerns over the City's proposal for residential development west of Lemoore directly under an established low level GCA box flight path of NAS Lemoore. Furthermore, we indicated that the impacts of such development were entirely predictable. The City's EIR predicted

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that up to 23 percent of the population in the developed areas will be "highly annoyed" and stated that future impacts will be both "significant and unavoidable" if the areas were developed as proposed.

In May 6, 2008, the City of Lemoore City Council passed Resolution # 2008-27, which adopted the City of Lemoore 2030 General plan.

The concern over incompatible development prompted NAS Lemoore, Kings County, Fresno County and the City of Lemoore to apply and subsequently receive a JLUS grant from the Department of Defense Office of Economic Adjustment.

A JLUS is a cooperative land use planning effort between affected local government and the military installation. The recommendations provide a policy framework to support adoption and implementation of compatible development measures designed to prevent urban encroachment; safeguard the military mission; and protect the public's health, safety, and welfare.

On August 19, 2011, NAS Lemoore JLUS Policy Committee Members adopted the JLUS report. The report contains several compatible land use recommendations which support the community's smart growth principles, while simultaneously providing NAS Lemoore with a encroachment free operating environment.

One of the recommendations of the JLUS calls for NAS Lemoore and the City of Lemoore to conduct a follow on "Small Area Study." The purpose of the study is to allow the Navy and the City to develop compatible land use recommendations beneath NAS Lemoore GCA box flight path. The area in questions coincides with the area that will be studied under the EIR.

In the near future, the Lemoore City Council will have the opportunity to review and adopt the JLUS report. NAS Lemoore recommends:

(1) The City Council adopt the JLUS report in its entirety.

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(2) To mitigate encroachment, as part of or in conjunction with the ongoing EIR, that the City Council conduct a "Small Area Study" as recommended by the JLUS.

Historically, encroachment has threatened the future of a military installations, leading to closure or to increased restrictions on installation activities. Employment statistics from Kings County Economic Development Corporation indicate that unemployment rates for Kings County teeter at over 14 percent. Additionally, they indicate Employment by Industry, "Government", is the largest employer in the region. Per the 2008 NAS Lemoore Economic Impact Assessment, the installation contributes over \$1~~8~~ to the local economy. Additionally, NAS Lemoore provides for over 13,500 full-time jobs, over 23,000 part-time jobs and provides support service to over 8,000 retired military veterans and their families. The Navy and the City should continue to work together in order to maintain NAS Lemoore's strategic and economic capacity now and in the future.

We are confident that the recommendations from the "Small Area Study" and findings from the completed EIR will help alleviate some of NAS Lemoore concerns over encroachment and incompatible development.

My staff and I appreciate your consideration. My point of contact for this matter is Mr. Roman V. Benitez, who can be reached at (559) 998-2939 or roman.benitez@navy.mil.

Sincerely,



ERIC VENEMA

Enclosure: 1. Pattern (GCA/FCLP) Flight Tracks (Fixed Wing)

CC: Ms. Holly Smyth
Planning Director
City of Lemoore
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Lemoore CA. 93245

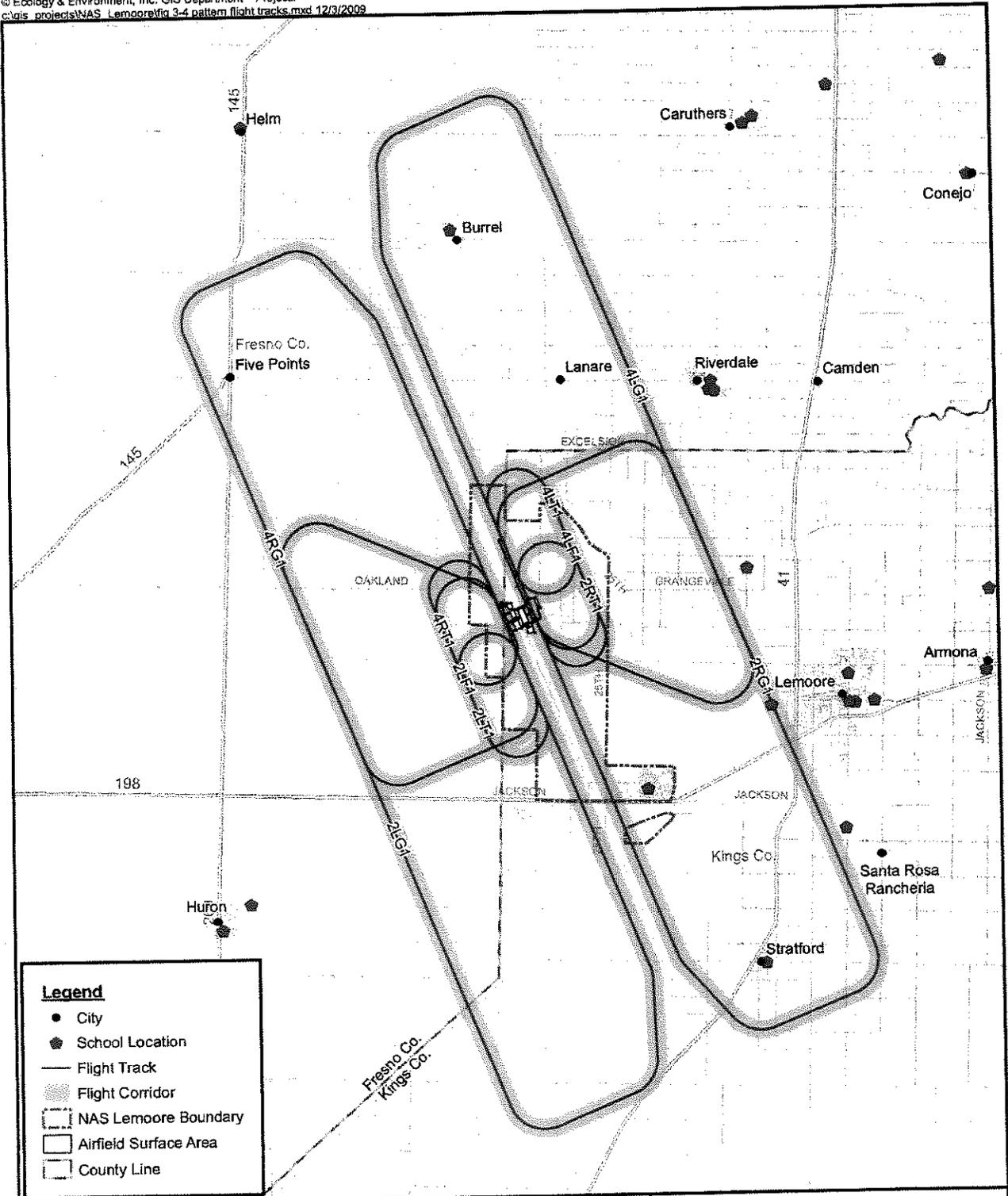


Figure 3-4
 Pattern (GCA/FCLP) Flight Tracks (Fixed Wing)
 NAS Lemoore
 Lemoore, California

NAS Lemoore
Lemoore, California

