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FEB 27 2020

STATE CLEARINGHOUSE

February 27, 2020

Ms. Susan Curtis
County of Ventura
800 S. Victoria Ave., L #1740
Ventura, CA 93009

RE: Ventura County 2040 General Plan Update
Vic. Countywide
SCH # 2019011026
Ref. GTS # VEM-2017-00228AL-NOP
GTS # VEN-2017-00388AL-DEIR

Dear Ms. Curtis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a comprehensive update of the County of Ventura General Plan, also known as the 2040 General Plan. The 2040 General Plan will set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

The Lead Agency has provided a VMT analysis for this project and using 2012 Baseline Model, 2040 Ventura County General Plan Land Use Model, 2040 VCTC and 2040 SBCAG travel demand model. For further review and feedback, it would be helpful if the County can share all models and assumptions with Caltrans to validate the model results (including 2040 General Plan results on page 4.16-24) provided in section 4.16 Transportation and Traffic.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, in general Caltrans concurs the County's policies for future developments that

should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets and policies for bicycling, pedestrian, and public transit which can allow streets to transport more people in a fixed amount of right-of-way.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. Moreover, we encourage mixed-use development with smart growth principle to shorten travel distance for different land uses to achieve job-and-housing balance within the County boundary.

We have the following comments and recommendations for the following policies:

Policy CTM-1.7: Pro Rata Share of Improvements. We concur that “the County shall require discretionary development that would generate additional traffic to pay its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County’s Traffic Impact Mitigation Fee Ordinance.” Caltrans recommend the improvements shall include the State facilities identified and approved by both agencies.

Policy CTM-2.9: State Route 118 Improvement in Saticoy Area. When the final list of improvement is approved by Caltrans and Ventura County Transportation Commission (VCTC), we recommend this list be a part of the fair share program in the County’s Traffic Impact Mitigation Fee Ordinance.

Policy CTM-2.19: Safety Metrics. We concur that “the County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Option include but are not limited to: queue spill-back at intersections; midblock unprotected crossings; and increased crossing distances.” Caltrans recommend the safety impact analysis shall also include off-ramps, State intersections, and weaving areas on the freeway mainlines. Caltrans will provide separate consultation for any queuing analysis when needed.

Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT). We concur that “the County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by...”. We recommend future projects to consider additional Traffic Demand Management (TDM) options referencing to the Federal Highway Administration’s *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

We recommend the County to develop a monitoring program to monitor the effectiveness of TDM or Vehicle Miles Traveled (VMT) Reduction Program.

We would like the County to invite Caltrans to review and to provide consultation/feedback when the County is developing or updating the following Implementation Programs in the future.

Implementation Program A: Traffic Impact Mitigation Fee Program.
Implementation Program B: Initial Study Assessment Guidelines.
Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.
Implementation Program D: Regional Road Network Coordination.
Implementation Program L: Master Bicycle Network Plan.

For Land Use and Community Character Element, we concur “**Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., noise, glare, and odors) on adjoining and adjacent residential area.” Again, this is where we would encourage the County to promote mixed-use development with smart growth principle to shorten travel distance for different land uses to achieve job-and-housing balance within the County boundary.

Policy HAZ-10.8: Alternative Transportation Modes. We concur that “the County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance “last-mile” transportation option to improve air quality.” We recommend

the County to develop a program to promote the alternative modes of transportation for new development projects.

For Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program, we concur that “During implementation of the 2040 General Plan, the County shall review and update the VMT Reduction Program as warranted to provide additional mitigations and Programs.” Again, we recommend the County to include Caltrans in the review and update process whenever is available.

For Mitigation Measure CTM-4: New Implementation Program CTM-X; Updated Traffic Impact Fee Mitigation Program, we concur that “the County shall require that development which adds traffic to roadways traversing within a County designated substandard roadway impact area contribute the fair share costs of any safety counter-measures that improve the safety of the impacted roadways by paying the applicable fees under the County’s Traffic Impact Fee mitigation program prior to issuance of Zoning Clearance.” Again, we recommend such safety improvements include the State facilities.

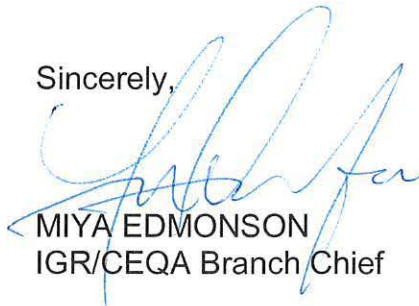
After this mitigation, we understand that “traffic volume would increase on existing roadways already identified as substandard facilities. Substandard roadways must be improved to meet County road standards to mitigate impact significance. Further, analysis of trips added by discretionary development to roadways identified as facilities with high collision/incidence rates must be explored at the project-level to ensure safety standards are met. No other feasible mitigation is available to eliminate safety concerns associated with the identified substandard roadways. Therefore, this impact would remain significant and unavoidable.”

On page 5-19 of the 2040 General Plan Draft Environmental Impact Report, we acknowledge that “the VMT impact analysis relies on existing and future growth accommodated through the 2040 General Plan and accounts for the projected growth of the incorporated cities and surrounding counties. Therefore, the transportation and traffic impacts identified in Section 4.16, are inherently cumulative. The VMT and County road standards and safety impacts would remain significant and unavoidable even with mitigation measures due to the increased development, new roadways, and increased numbers of users on the county’s transportation system that would result from implementation of the 2040 General Plan. Therefore, the potential for cumulative impacts related to transportation and traffic would be cumulatively significant, and the project would have a considerable contribution.” In the end, we recommend the County to work with Caltrans closely for each specific large project in the future to identify safety improvements on the State facilities and also in achieving to reduce VMT with land use balance principle.

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If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-VEN-2017-00388AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse