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Governor's Office of Planning & Research

Feb 02 2022

STATE CLEARING HOUSE

February 2, 2022

Jay Dobrowalski
Community Development Department, Planning Division
City of Oxnard
214 South C Street
Oxnard, CA 93030

RE: Teal Club Specific Plan (TCSP)
SCH #2012051080
Vic. VEN-101/PM 21.01, VEN-34/PM 6.28
GTS # VEN-2021-00469-DEIR

Dear Jay Dobrowalski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The TCSP Specific Plan would involve development on the 149.72-acre area north of Teal Club Road (known locally as "Teal Club"). Development of the TCSP area would involve construction of up to 990 single and multifamily residential units (of which approximately 148 would be affordable housing units); development of up to 132,000 gross square feet (gsf) of business park; up to 60,000 square feet of Urban Village commercial space; 17.76 acres of community and neighborhood parks and open space; new and widened on- and off-site arterials and collector streets; utility infrastructure including complete recycled water irrigation; resident and visitor parking; bicycle and pedestrian paths and sidewalks; bus transit stops; various pocket parks and resident recreation areas; and landscaping within the individual residential projects.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and 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. You may reference the Governor's Office of Planning and Research (OPR) for more information:

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

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

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, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We 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. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

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

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for all future projects:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Public transportation in the Oxnard area is provided by Gold Coast Transit. Gold Coast Transit Route 4A (Gonzales Road – North Oxnard) and 4B (St. John’s – Gonzales Road) currently provide transit service in the vicinity of the project area with bus stops located at Doris Avenue and M Street approximately 0.15 miles east of the project site. In addition, Gold Coast Transit Routes 21 (Pacific View Mall – Victoria Avenue – C Street), 19 (Fifth Street – Victoria Avenue – Gonzales Road) and 20 (Rice Avenue – Gonzales Road – Fifth Street) provide transit service along Victoria Avenue with bus stops at Victoria Avenue and Fifth Street and Victoria Avenue a little over one mile west of the project site. The City also provides a “dial-a-ride” transit service for elderly and handicapped residents. The service is well utilized and provides valuable transportation for essential purposes (medical and shopping).

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. As the project area is currently used for agricultural operations, there are no pedestrian sidewalks around or within the project area. There are pedestrian sidewalks on the east side of Ventura Avenue across the street from the project area and on the north side of Doris Avenue across the street from the project site.

Construction of the Teal Club will result in provision of Class II bike lanes on Patterson Road, Doris Avenue, Teal Club Road and Ventura Road adjacent to the Specific Plan area as well as an internal Class I route along Beverly Drive. There are no other dedicated bicycle facilities provided in the vicinity of the project site.

“Per Senate Bill (SB) 743, the State CEQA Guidelines have been updated to incorporate VMT as the primary metric for analyzing transportation impacts under CEQA. The City of Oxnard has not adopted specific thresholds related to VMT. The OPR’s Technical Advisory on Evaluating Transportation Impacts provides guidance on analyzing VMT impacts in light of SB 743. The Advisory recommends thresholds for residential, office, and retail land uses. The proposed TCSP includes residential, commercial mixed use (retail and office), a business and research park, as well as parks and open space. The proposed Annexation area would allow for warehouse and manufacturing uses.

Therefore, OPR's advisory does not recommend thresholds for many of the land uses proposed under the TCPS and Annexation. Nonetheless, the Advisory suggests that residential or retail projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact." The existing available VMT should be disclosed in the VMT analysis.

"Based on the CalEEMod estimate, the proposed project would result in approximately 25,349,026 new annual VMT. This would equate to approximately 4,207 miles per service population (residents and employees) per year or approximately 12 miles per day. By comparison, the Southern California Association of Governments estimates the 2040 average work trip length at 15.5 miles. This suggests an average of 31 miles (15.5 x 2) per employee per day. The 12 miles per employee per day for the project would be about 61% lower than this average, which far exceeds the 15% reduction threshold that the OPR recommends." Please justify and validate the outcome of each land use VMT (residential, office, and retail) as substantial evidence needs to be provided. A post-development VMT analysis with all mitigation measures should be prepared. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

However, we also learned that the proposed project is intended to provide for overall VMT reduction. The project site is in an urbanized area immediately adjacent to alternative transit options and within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Nearby commercial areas include Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza. The proposed development also incorporates dedicated pedestrian and bicycle paths, new bus stops and bus shelters. Finally, the TCSP is a mixed-use development that provides housing, jobs, and visitor amenities in proximity to transit options, jobs, and services. Based on these facts, the TCSP is consistent with the general goal of reducing GHG emissions by reducing VMT.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # VEN-2021-00469AL-RDEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse