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November 4, 2020

Governor's Office of Planning & Research

Nov 04 2020

Justin Bertoline
Ventura County Planning Division
800 South Victoria Avenue
Ventura, CA 93009

STATE CLEARINGHOUSE

RE: Somis Ranch Farmworker Housing Complex
–Draft Environmental Impact Report (DEIR)
SCH # 2020049020
GTS # 07-VEN-2020-00422
Vic. VEN-34/PM: 16.06

Dear Justin Bertoline:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project would construct a 100% affordable multi-family housing complex for farmworkers on three proposed parcels totaling 18.43 acres and continue agricultural use on a 17.93-acre parcel. The proposed housing complex would include 360 dwelling units, 654 parking spaces, 379 bicycle parking spaces, and a community wastewater treatment facility that would serve the housing complex as well as produce recycled water for irrigating the adjacent agricultural fields. The project will also benefit from the City of Camarillo improving an existing driveway to State Route 34 (SR-34) and creating a new driveway to SR-34 as part of the North Pleasant Valley Groundwater Treatment Facility and De-Salter Project. The Project has a shared access agreement with the City of Camarillo to utilize the new access connections to Somis Road that will serve the groundwater treatment facility. The southern access connection will include a bicycle/pedestrian pathway. The Ventura County Planning Division is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is adjacent to SR-34 (also known as Somis Road), approximately 1.5 miles away from the SR-34 and State Route 118 (SR-118) intersection, and approximately 2.5 miles away from the SR-34 and United States 101 (US-101) interchange. From reviewing the DEIR, Caltrans has the following comments:

- The County has provided both a Vehicle Miles Traveled (VMT) analysis and Level of Service analysis for this project. Since the implementation deadline for Senate Bill (SB) 743 (2013) has passed, Caltrans has reviewed this project from a VMT perspective. As discussed in the DEIR, SB 743 mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020.
- The DEIR states "The County is in the process of adopting formal thresholds of significance under SB 743." Caltrans strongly recommends that the County adopt thresholds and methodologies for analyzing VMT and identifying mitigations that are consistent with the recommendations in the 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR).
- In the meantime, the County has conducted a qualitative VMT analysis based on recommendations in OPR's Technical Advisory. This advisory states that a presumption of less than significant (LTS) impact can be made for 100 percent affordable residential developments in infill locations.

- The DEIR states that while this project is not in an infill location, it can still be presumed to have a LTS impact because it is a 100% affordable housing project and it is in an agricultural area near where site residents would likely work, which would decrease VMT. Caltrans agrees with this assessment.
- Caltrans also concurs with the results of the signal warrant analysis conducted for the Somis Road/Northern Project Access intersection and the Somis Road/Southern Project Access intersection, which states that signals are not warranted at these intersections.

The following information is included for your consideration. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as providing 379 bicycle parking spaces. Additional TDM options that could be incorporated into this project to further reduce VMT include:

- Ensure that pedestrian and bicyclist connections to the school located near the project are maintained during construction.
- Decrease the amount of vehicle parking provided.
- Coordinate with Camarillo Area Transit to explore rerouting its bus route onto SR-34 to serve the complex.
- Provide free or reduced-cost transit subsidies to project residents.
- Create secure, indoor bicycle storage facilities within walking distance of housing units.
- Offer bicycle safety and basic repair education to residents.

Also, any transportation of heavy construction equipment or materials that requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. If construction traffic is expected to cause delays on any State facilities, please submit a Construction Traffic Management Plan detailing these delays for Caltrans' review. Caltrans also recommends that the project limit construction truck traffic to off-peak periods to minimize the potential impact on State facilities.

Finally, encroachment permits are required for any project on or near Caltrans right-of-way. The proposals to create a new driveway off of SR-34, improve an existing driveway off of SR-34, and create new turning lanes on SR-34 will likely require encroachment permits. However, this decision will be subject to additional review by the Office of Permits. Furthermore, projects on or near Caltrans right-of-way should conform with Caltrans' design standards. Thus, Caltrans supports the following statement: "The City of Camarillo will be required to construct the access connections to Somis Road to County of Ventura and Caltrans design standards." The Office of Permits might request detailed driveway designs, including the design of the pedestrian and bicycle pathway included in the southern access connection.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-VEN-2020-00422.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse