

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

**Governor's Office of Planning & Research**

**Oct 02 2020**

**STATE CLEARINGHOUSE**

October 2, 2020

Tyler Barns  
Ventura County Public Works Agency – Watershed Protection  
800 S. Victoria Ave. #1600  
Ventura, CA 93009

RE: Ventura River (VR-1) Levee  
Rehabilitation Project – Notice of  
Preparation (NOP)  
SCH # 2020090144  
GTS # 07-VEN-2020-00418  
Vic. VEN-33/PM: 2.007 to  
VEN-101/PM: 30.903

Dear Tyler Barns:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Notice of Preparation (NOP). The proposed project involves structural additions and improvements to the VR-1 levee to address deficiencies, increasing the level of protection to residents and businesses in the City of San Buenaventura (commonly known as Ventura) located within the one percent annual chance (also known as the 100-year) flood zone. The proposed project objectives include constructing new, upgrading existing, and maintaining levee structures to provide flood protection; achieving compliance with Federal Emergency Management Agency certification requirements; and extending the levee's capital service life.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT). Effective July 1<sup>st</sup>, 2020, Caltrans replaced LOS with VMT when evaluating traffic impacts.

For any future project, like the proposed EIR, we encourage the Lead Agency to adopt or develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria as required by SB 743.

After reviewing the project's NOP Caltrans has the following comments:

- According to the NOP, the proposed project may have significant impacts to level of service, safety of public roads, and vehicle miles traveled due to the extent of heavy equipment and vehicles required primarily during construction. Additionally, construction of Segment 5 would require phased lane closures of SR-33. As such, permits are required from the Office of Permits for the approval of the following, prior to beginning construction:
  - Heavy equipment movements on state right of way during construction.

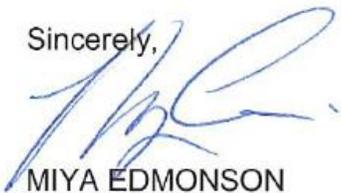
- State route closures during construction.
- The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Therefore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to meet these goals. For examples of TDM options, please refer to:
  - The 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
  - Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.
- Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.
- If the project develops VMT analysis please consider utilizing the latest version of the Technical Advisory and Guidelines on Evaluating Transportation Impacts in CEQA by the Governor's Office of Planning and Research, and the latest version of Caltrans' Transportation Impact Study Guide.

Further information included for your consideration:

Storm water run-off is a sensitive issue for Los Angeles and Ventura County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-VEN-2020-00418

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse