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STATE CLEARINGHOUSE

August 31, 2021

Mr. Tony Stewart
AICP Community Development Director/City Planner
City of Port Hueneme
Community Development Department
250 North Ventura Road
Port Hueneme, CA 93041

RE: City of Port Hueneme General Plan and
Housing Element Update
SCH # 2021040164
Vic. LA-01 Citywide
GTS # VEN-2021-00456-DEIR

Dear Mr. Stewart:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The General Plan Update involves a comprehensive update of all elements of the existing Port Hueneme General Plan and the Local Coastal Program Update involves a targeted update aimed primarily at incorporating new requirements pertaining to sea level rise. The General Plan contains the following elements: Air Quality; Circulation; Conservation, Open Space, and Environmental; Economic Development; Social Equity; Housing; Land Use; Noise; Public Safety and Facilities; Climate Action Plan (CAP) Element; and Local Coastal Program.

The Housing Element is a state-mandated part of the City's General Plan and includes goals, policies, programs and objectives to further the development, improvement and preservation of housing in Port Hueneme in a manner that is aligned with community desires, regional growth projections, and State law. The Housing Element must address how the City will meet its housing needs, including the provision of adequate housing for residents of all income levels. One requirement of Housing Element is to provide adequate housing sites to provide for the City's share of the Regional Housing Needs Allocation (RHNA), which quantifies the need for housing in every region throughout the state and is determined by the California Department of Housing and Community Development. The City's total draft RHNA for the 2021-2029 planning period is 125 units.

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>

Transportation Demand Management

The City of Port Hueneme does not have a formalized Transportation Demand Management (TDM) requirement. VMT will result in the need for businesses to reduce Single Occupant Vehicle (SOV) commute trips. TDM measures that reduce commute trips have been utilized successfully by others in California. In order to facilitate trip reductions, the availability of alternative modes such of transportation is necessary. We recommend the City to use the above TDM strategies for all future developments.

Transit Service

Gold Coast Transit (GCT) is the transit provider in the City of Port Hueneme. Four fixed routes (Route 1A, Route 1B, Route 3 and Route 21) operate in the City. Bus service is provided along the major corridors including Channel Islands Boulevard, Pleasant Valley Road, Ventura Road, Bard Road, Port Hueneme Road and Surfside Drive. Bus shelters are provided by GCT for riders waiting at stops. Bike racks are provided on every fixed route which allows the bicyclist to interface with the transit system. The City should evaluate if more bus routes are needed to service the community.

Pedestrian and Bicycle Facilities

The City of Port Hueneme provides pedestrian facilities within and between residential neighborhoods, also in commercial areas and the area of the Port. Sidewalks and crosswalks are provided along all major roadway corridors and transit routes in the City. In addition to being a recreational activity, biking is an alternative to automobile transportation. Bike Path (Class I, II, & III) are provided in Port Hueneme.

Rail Service

A single line railroad serves the Port Hueneme Harbor and is maintained by the Ventura County Railroad (VCRR). At this time the rail line is not active. However, future use of the rail line could potentially reduce the number of Port related truck trips through the City of Port Hueneme. This could be a part of City overall TDM program.

Port of Hueneme

The Port of Hueneme is a major employer and significant trip generator in the City. Historically the Port averages more than 200 daily truck trips. Increased vessel throughput at the Port may result in significant impacts on area roadways and intersections, as trucks transport cargo to and from the Port for shipment on vessels. Truck traffic generated by the Port originates or is destined for Northern California or Southern California via U. S. Highway 101. Trucks use two primary routes through the City of Port Hueneme to access U.S. Highway 101. The Port of Hueneme is aware of truck traffic in residential neighborhoods and attempts to minimize the impact. It is recommended that large size truck trips be limited to off-peak commute periods.

The project would have a significant and unavoidable impact on VMT. Goals and policies within the 2045 General Plan are designed to reduce VMT through infill development, higher-density and mixed-use development, and enhancing the quality of nonmotorized transportation options. However, even with implementation of these measures, VMT in Port Hueneme would not achieve the 15 percent reduction compared to the regional average as recommended by the OPR Technical Advisory. There are no other feasible mitigation measures available in this environmental report. We would like the City to consider the above TDM strategies to achieve the OPR recommended VMT thresholds.

The OPR offered generalized recommendation of 15% reduction below existing VMT thresholds for CEQA significance. For the Traffic Study dated June 3, 2021, the existing VMT data was not disclosed. City of Port Hueneme has not adopted a formal methodology or impact threshold for VMT. We recommend the City to adopt a VMT thresholds whenever possible.

Mr. Tony Stewart
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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-2021-00456-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

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