DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

JUN 13 2019

June 5, 2019

STATE CLEARINGHOUSE

Franca A. Rosengren
Case Planner
Ventura County Planning Division
800 S. Victoria Avenue, L# 1740
Ventura, CA 93009

RE: Modification of Conditional Use Permit

960 (Case No. PL 15-0106)

SCH# 2019059017

GTS# 07-VEN-2019-00259 Vic. VEN-126/ PM 8.622

Dear Ms. Rosengren:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed request calls for the reinstatement and modification to CUP 960 to authorize the continued operation of, expansion of, and various operational changes to, the existing Community. Sewage Treatment Facility (Case No. PL 15-0106) until August 30, 2040. The applicant seeks to continue to accept, treat and dispose offsite by trucks and by sewer discharge various types of non-hazardous waste streams. The applicant proposes to continue to utilize the existing 12-mile sewer discharge pipeline connected to the City of Oxnard's Wastewater Treatment Plant for discharge of various non-hazardous waste streams (Attachment 8). The applicant proposes to continue to treat and discharge industrial and commercial waste material to the City's Wastewater Treatment System.

As Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability." After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

The nearest State facility to the proposed project is State Route 126 and the closest ramp from the Project Site is Briggs Road in Ventura County. The proceeding documents need to identify and specify any work that would affect the freeways and its facilities. When analyzing potential impacts to the Caltrans facilities, off-ramp queuing analysis based on Highway Capacity Manual (HCM) queuing methodology is required.

Senate Bill 743 (2013) mandates that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metrics

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in identifying impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information: http://opr.ca.gov/ceqa/updates/guidelines/.

The Ventura County Planning Division needs to develop a verifiable performance VMT criteria. This step is critical as the Traffic Impact Study (TIS) will be based on the VMT criteria. If the County decides to use Level of Service methodology when preparing the traffic analysis on the State facilities, please refer to Caltrans's Study Guide: http://www.dot.ca.gov./hq/tpp/offices/ocp/igr ceqa files/tisguide.pdf.

We look forward to reviewing the DEIR that includes traffic impact analysis of State Route 126 based on VMT methodology or Caltrans TIS Guide.

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

We look forward to your cooperation and reviewing any proceeding documents related to this project. If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov and refer to GTS# 07-VEN-2019-00259.

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Since

IGR/CEQA Branch Chief

Cc: Scott Morgan, State Clearinghouse