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Making Conservation
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September 18, 2025

Jamie Peltier, Planning Supervisor
Community Development Department
City of Oxnard
214 South C Street
Oxnard, CA 93030

RE: Avalon Homes Project
SCH # 2016051075
Vic. VEN-101/PM R24.65,
VEN-1/PM R15.11,
VEN-34/PM 6.29,
GTS # VEN-2019-00649-RDEIR

Dear Jamie Peltier:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The project would include the construction of a maximum of 65 residential dwelling units. The property would be subdivided into 17 residential lots and five open space lots. Proposed Tentative Tract Map 5888 would create 15 individual lots for the 15 single family residences or 30 duplex residences and two lots for 35 single family residential clustered condominium units.

Two of the five open space lots (totaling 29.58 acres) are designated and zoned for Resource Protection (R-P) and would remain undeveloped, except for minimal improvements to allow controlled public access. Together with land already owned by the City of Oxnard, this component of the project would preserve the designated sensitive habitat within the "Northern Dunes Area" shown in the Coastal Land Use Plan. The three remaining open space or common lots would include a drainage mitigation area, open space at the project gated entry and a private community recreation area. The project includes a restoration plan for the Northern Dunes Area, which details the access and management proposed for this area.

The Recirculated Draft EIR identifies a significant and unavoidable impact for the Transportation resource area. This significant and unavoidable impact includes mitigation and is associated with conflicts with Section 15064.3 of the CEQA Guidelines as it relates to Vehicle Miles Traveled (VMT).

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. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

https://opr.ca.gov/ceqa/#guidelines-updates

The Project includes sidewalks and walking trails that align with applicable RTP/SCS policies, such as Policy 03, which encourages the development of multi-modal streets that accommodate walking, biking, and driving. The proposed loop paths within the northern open space area would connect to the sidewalk network along the new internal circulation road, providing opportunities for pedestrians and bicyclists to access the broader transportation system in Oxnard. This design is also consistent with the goals of the Oxnard Sustainable Transportation Plan.

While the Project may incrementally increase transit use, the applicant would be required to pay City of Oxnard traffic impact fees, which would contribute to improvements and expansion of local transit facilities.

The Project is projected to result in 14.35 VMT per capita within the TAZ. By comparison, the countywide baseline VMT per capita in 2016 was 13.77 miles, with the CEQA significance threshold set at 15 percent below baseline, or 11.70 miles. Because the Project's VMT per capita exceeds the 11.70 threshold, it would potentially conflict with CEQA Guidelines Section 15064.3(b), and impacts are considered potentially significant.

Caltrans concurs with Mitigation Measure T-2 (Bicycle Improvements), which requires the applicant to provide bicycle parking at the small parking lot within the northern open space area. The number of bicycle spaces should be no fewer than the number of vehicle spaces, and bicycle racks or lockers should be designed in natural colors to blend with the surrounding open space. In addition,

the applicant would provide a Class III bicycle lane along the full length of the internal circulation road, creating a continuous bicycle connection between Dunes Street at the north end and Canal Street at the south end.

However, even with implementation of Mitigation Measure T-2 and the proposed multimodal features, the Project's VMT per capita would continue to exceed the CEQA threshold. As such, transportation impacts related to VMT would remain significant and unavoidable.

The Project is anticipated to exceed the CEQA threshold for VMT and therefore results in a significant transportation impact. While existing transit services such as Routes 1, 34, and 101 are located at some distance from the site, the Project would contribute to increased trips on these corridors as well as additional congestion and delay on local streets, freeway ramps, and key intersections.

To reduce these potential impacts, Caltrans recommends that the City consider implementing a comprehensive Transportation Demand Management (TDM) program. Potential measures include enhancing transit access through shuttle or micro-transit service, improving nearby bus stop facilities, and offering transit subsidies to residents. Expansion of active transportation infrastructure should also be prioritized, including improved bicycle and pedestrian connections, secure bike parking, bike-share facilities, and wayfinding signage. On-site mobility solutions such as EV charging, carpool support, real-time mobility information, and designated live/work units could further reduce reliance on single-occupancy vehicle trips.

Finally, we encourage the City to consider applying Complete Streets principles at the design stage to integrate multimodal features such as sidewalks, bike paths, bus stops, and rideshare facilities. Coordinated intersection upgrades may also be needed to accommodate higher volumes of vehicles, bicycles, and pedestrians. Taken together, these strategies would improve the Project's VMT performance and support a safer, more balanced transportation system.

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover. Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water.

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-2019-00649-RDEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse