

COUNTY OF VENTURA

RESOURCE MANAGEMENT AGENCY
PLANNING DIVISION

M E M O R A N D U M

DATE: January 18, 2002
TO: Joseph Eisenhut
FROM: Bruce Smith, Manager, General Plan Section
SUBJECT: DEIR for Oxnard Riverpark Project (Reference No. 01-105)

The Planning Division has reviewed the above environmental document and offers the following comments:

Land Use Planning Programs and Policies

The unincorporated portion of the site is currently zoned as "A-E/MRP" (Agricultural Exclusive/Mineral Resources Protection Overlay), "OS-40 Ac./MRP" (Open Space, 40 acre minimum/Mineral Resources Protection Overlay), and "CPD" (Commercial Planned Development). The purpose of the Mineral Resources Protection Overlay zone is to safeguard future access to important resources, in this case aggregate resources. The Agricultural designation is intended to preserve and protect agricultural resources as a limited and irreplaceable resource. The purpose of the Open Space designation is to provide for the conservation of natural resources, preserve and enhance environmental quality and to provide for the retention of the maximum number of future land use options. The DEIR should evaluate the project's consistency with existing zoning designations.

VCPD-1

The General Plan designation for the unincorporated portion of the site is "Agricultural", "Open Space" and "Urban Reserve Overlay". The DEIR should evaluate consistency with the County General Plan Goals, Policies and Programs associated with these designations and other relevant policies. (See discussion of impacts to the Regional Road Network below.)

VCPD-2

The El Rio/Del Norte Area Plan designates the site as "Agricultural, 40 Acre Minimum", "Open Space, 40 Acre Minimum" and "Commercial". The draft DEIR fails to analyze the project's consistency with the existing El Rio/Del Norte Area Plan land use designations and relevant goals, policies and programs.

VCPD-3

Location # 1740
800 South Victoria Avenue, Ventura, CA 93009

The DEIR should analyze the impacts of the project on the jobs/housing balance of the City of Oxnard and the El Rio/Del Norte area. Analysis should include the kinds of jobs that will become available and the ability of the project to provide commensurately affordable housing, particularly for low-income workers.

VCPD-4

The La Colonia Avenue neighborhood is surrounded by the project on three sides. The project should be revised to include the integration and eventual annexation of the La Colonia Avenue neighborhood into the project.

VCPD-5

Transportation/Circulation

The DEIR identifies a number of roadway and intersection improvements needed for the project. The DEIR also indicates that the project will pay \$17.7 million in traffic mitigation fees to the County of Ventura and the City of Oxnard. The DEIR concludes that the project would, therefore, cause no significant adverse traffic or circulation impacts. However, the DEIR is missing is any kind of actual analysis to support this conclusion. The DEIR should be revised to determine the cost and feasibility of proposed mitigation measures. The DEIR should condition the timing of the Riverpark project development to coordinate with construction of needed improvements so that the improvements will be in place when they are needed. Otherwise, the DEIR should disclose that significant adverse traffic impacts would occur to the regional road system during the lag period after project development but before the recommended circulation improvements can be constructed.

VCPD-6

The DEIR indicates that US 101 will operate at LOS F and the Riverpark project will generate 94,174 ADT, adding 78,840 ADT to the Regional Road Network, but the DEIR concludes that the project will cause no significant adverse traffic or circulation impacts because improvements necessary to achieve an acceptable level of service on the Ventura Freeway will be identified and addressed through the Ventura County CMP program. The DEIR should be revised to disclose what improvements would be required to achieve an acceptable level of service on the Freeway. Unless there is a funded program in place to improve the freeway prior to development of the Riverpark project, the DEIR should disclose that the project would have a significant adverse impact on the US 101 Freeway, at least until such time as the Freeway improvements are completed.

VCPD-7

The DEIR needs to address how the project will accommodate the future extension of Kimball Road (shown as Reserved Right of Way on the County's Regional Road Network map). It is not clear whether proposed Santa Clara River Boulevard could accommodate a future extension of Kimball Road or whether the planned school

VCPD-8

(located west of the terminus of this road) would preclude a connection to the proposed Kimball Extension. In the Event Santa Clara River Boulevard is intended to provide for the future extension of Kimball Road, the School site (Parcel N) should be subject to an easement or deed restriction that would permit the future construction of the Kimball Road extension, at least until such time as the County determines that such Reserved Right of Way will not be required for the County's Regional Road Network. In the event the project would prevent the future extension of Kimball Road, the DEIR should be revised to disclose the project would have a significant impact on the Regional Road Network, as currently planned by Ventura County and the City of Ventura.

VCPD-8

Wastewater Service

The Regional Water Quality Control Board requires that the use of septic systems be terminated in the near future for the El Rio Community. Thus, the DEIR cumulative analysis should be revised to consider whether planned sewer trunk lines and waste capacity can accommodate the connection of the El Rio Community to the City's system.

VCPD-9

County of Ventura Resource Management Agency – Planning Division (VCPD)**VCPD-1**

As discussed in the Draft EIR, all recoverable mineral resources, in this case sand and aggregate, have been mined from RiverPark Area 'B' under Conditional Use Permits issued by the County of Ventura. Reclamation of the site is currently ongoing under the reclamation plan approved by the County of Ventura. The purposes for the existing county zoning referred to in this comment have, therefore, been met. The mineral resources in RiverPark Area 'B' have been recovered and future land use options were preserved during the years of mining activities.

Adoption of a new reclamation plan for the site at this time to support the development of residential, school and public facilities uses in RiverPark Area 'B' would not be inconsistent with the purposes of the existing county zoning designations.

VCPD-2

Annexation of RiverPark Area 'B' to the City of Oxnard is proposed. Development of this portion of the Specific Plan Area under the existing County of Ventura General Plan designations is not proposed. As described in the Project Description section of the Draft EIR, upon annexation RiverPark Area 'B' would be subject to the Oxnard 2020 *General Plan* Land Use Map Designations proposed and the proposed RiverPark Specific Plan. As discussed in the response to the previous comment, the purpose of the County's Open Space designation to allow mineral resource recovery in RiverPark Area 'B' has been met. The County's current agricultural land use designation for a portion of RiverPark Area 'B' does not reflect current land uses. The majority of the area designated for agricultural use by the County General Plan was developed by the County as the El Rio Retention Basin No. 2 (commonly referred to as the Campbell Basin). Development of this drainage basin by the County left only a small strip of agricultural land, approximately 17 acres, located between the basin and Vineyard Avenue. This small parcel of remaining agricultural land would be developed with school and park facilities under the proposed RiverPark Specific Plan. Development at this time with the proposed uses is consistent with the Urban Reserve Overlays applied to this area by both the County and City General Plans.

VCPD-3

Development of RiverPark Area 'B' would occur after annexation subject to the City of Oxnard General Plan and RiverPark Specific Plan. As discussed in the responses to the previous two comments, the

existing County open space and agricultural land use designations no longer serve any purpose as the mineral resources present on the site have been mined out and the agricultural land has been developed by the County. The existing commercial land use designation in the El Rio Area Plan applies to a small parcel of less than one acre located between Vineyard Avenue and El Rio Retention Basin No. 1. Development of the RiverPark 'B' Area subject to the proposed Specific Plan would not affect this small commercial parcel. Adoption and implementation of the proposed RiverPark Specific Plan would not be inconsistent, therefore, with any of the policies in the El Rio Area Plan related to mineral resources, agricultural resources or commercial uses.

VCPD-4

The Draft EIR includes analysis of the consistency of the project with applicable demographic projections, including population, housing and employment forecasts for the region adopted by the Ventura Council of Governments (VCOG) and the Southern California Association of Governments (SCAG). SCAG submitted a comment letter on the Draft EIR that is contained in this Final EIR. SCAG indicates in this letter that the analysis in the EIR of the consistency of the project with regional plans and policies, including applicable demographic projections, is complete and adequate. The SCAG letter reads:

"The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our May 19, 2000 letter on the Notice of Preparation (NOP) for this Draft EIR. The Draft EIR cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. This approach to discussing consistency with or support of SCAG policies is commendable and we appreciate your efforts."

With regard to the topic of jobs/housing balance the Growth Management Element of the SCAG RCPG states:

"Jobs/housing balance, as a growth management and mobility strategy, and as a Transportation Control Measure, has been difficult to implement regionally, and has been the subject of numerous regional debates. The extent of its efficacy in reducing congestion and emissions of air pollutants has been questioned."

The SCAG RCPG Growth Management Element does not contain any numerical standards or targets for the balance of jobs and housing in an area. The following policy is included in the Growth Management Element:

"SCAG shall support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions."

While no adopted numeric standard for jobs/housing balance exists at this time, discussion of appropriated balances has been considered previously. One study that addressed the appropriateness of numerical targets for measuring the balance of jobs and housing was the Vehicle Miles Traveled Reduction Final Report produced in 1995 by the County of Ventura Planning Department for the Ventura Council of Governments. This study was funded by SCAG.

Page 3-5 of this report discusses jobs/housing balance measures. This discussion reads as follows:

“The jobs/housing ratio for the 6-county SCAG region is 1.21 (i.e., 1.21 jobs per dwelling unit). This number represents a jobs/housing “equilibrium” or balance within the SCAG region.” “Although a quantitative measure has limitations, this study has used the SCAG region’s job/housing ratio of 1.21 as a suggested *guideline* for comparing jobs and housing in the VCOG Subregion. Because the literature suggests there is disagreement as to what constitutes an appropriate “balance” ratio, staff employed a numerical range that features a 10% latitude above and below the SCAG “benchmark” ratio (i.e., the suggested balance range for the VCOG Subregion could be 1.10:1 to 1.34:1). A ratio lower than 1.10:1 represents excess housing (“housing rich”), and a ratio higher than 1.34:1 would mean excess jobs (“jobs-rich”). The 10% latitude factor is consistent with other literature and studies such as previous SCAG studies and the Ahmanson Ranch Specific Plan/EIR documents.”

As presented in Table 4.1-5 in the Draft EIR Land Use section, the adopted SCAG demographic projections for the City of Oxnard for the year 2020 are for the City to have 55,000 residences and 75,800 jobs. The resulting jobs/housing ratio projected for the City of Oxnard in the year 2020 is 1.38, which would be slightly higher than the 1.10:1 to 1.34:1 balance range identified previously by the County.

The proposed RiverPark Specific Plan will improve the jobs/housing ratio for the City of Oxnard by adding 2,805 new housing units in the northern part of the City while reducing the amount of jobs generated in this same area. The existing Oxnard Town Center Specific Plan, which applies to most of RiverPark Area ‘A’, allows development of up to 4.4 million square feet of commercial development which would generate 11,460 employment opportunities. The Oxnard Town Center Specific Plan provides no housing. By replacing the Oxnard Town Center Specific Plan with the RiverPark Specific Plan, which will generate 5,370 employment opportunities, the City will increase housing opportunities by 2,805 units while reducing jobs by 6,090. When these adjustments are made to the 2020 housing and employment forecasts for Oxnard, the resulting jobs/housing balance is 1.19, which is balanced based on the numerical thresholds discussed above. The RiverPark Specific Plan allows a variety of commercial uses, including office, hotel, and retail commercial uses, as well as a variety of housing types, including multi-family and single-family units, including 15 percent affordable housing to match the types of jobs to be generated by the commercial uses.

VCPD-5

The RiverPark Specific Plan, as proposed by the applicants, does not include the La Colonia Avenue neighborhood (referred to as the El Rio West Neighborhood in the EIR). The question of whether annexation of this neighborhood to the City of Oxnard would promote more orderly jurisdictional boundaries in this area is at the discretion of the Ventura County Local Agency Formation Commission (LAFCO).

VCPD-6

The traffic analysis in the Draft EIR identifies significant impacts and physically feasible measures to mitigate these impacts. The methodology for the traffic study is described on pages 4.7-17 through 4.17-19 of the Draft EIR. As described in Section 3.0, Project Description, of the Draft EIR, the applicant's current objective is to complete the construction of the Phase One site improvements by the third quarter of 2002 with the first occupancy of residences or commercial buildings in 2003. The Phase Two site improvements would be built when there is market demand for the property served by these improvements. Based on market studies, it is anticipated that the community would take between 12 and 15 years to be fully built, depending on economic conditions. For purposes of analysis in the Draft EIR, it is assumed that the Specific Plan Area would be fully developed by the year 2020, which is the horizon year for the Oxnard 2020 *General Plan*. Accordingly, the traffic analysis examines future year 2020 traffic conditions, assuming full development of the uses that would be allowed by the proposed Specific Plan.

Future year 2020 traffic conditions in the City of Oxnard and surrounding areas were analyzed using the City's Oxnard Transportation Model (OTM), which is based on the Ventura County Transportation Commission (VCTC) model. The VCTC model was prepared using Southern California Association of Governments (SCAG) land use data and is updated regularly as new land use projections are made available. Existing and future freeway traffic volumes projected by the VCTC model for freeway segments were used, as the VCTC is the most accepted model for transportation planning in Ventura County. Future freeway traffic volumes were determined by adding the growth between the VCTC's future model volumes and the existing model volumes to the existing traffic volumes. As the VCTC model does not provide information on intersection turning movements, the OTM was modified to provide this information. In addition to fully reflecting projected regional growth, the OTM reflects full development of all the uses allowed by the City's 2020 *General Plan*. This methodology results in a conservative traffic impact analysis. The impacts identified at 8 of the 33 intersections studied reflect full build-out of the City's 2020 *General Plan* and the RiverPark Specific Plan along with projected regional growth. The intersection improvements identified as mitigation measures are required by the year 2020

to accommodate the projected levels of traffic. These intersection improvements are consistent with those identified in the City and County General Plan Circulation Elements that form the basis for the amount of the City and County traffic impact fees. If the uses allowed by the City and County General Plans are not built out to the maximum intensity allowed, traffic impacts may be less than those projected and identified in the Draft EIR. For these reasons, the amount of the City and County impact fees to be paid by uses allowed by the County and City General Plans, inclusive of the RiverPark Specific Plan will be sufficient to fund the improvements needed.

As discussed on page 4.7-35 of the Draft EIR, traffic impact fees will be required to be paid at the time of issuance of building permits for individual development projects within the Specific Plan Area. These fees will be paid to the City of Oxnard and County of Ventura as the allowed uses within the Specific Plan Area are built out over time along with other uses allowed by the Oxnard General Plan. The City and County will use these fees to construct needed improvements through their respective capital improvement programs. For this reason, there will be sufficient time for the City and County to program needed improvements as the project builds out incrementally over this long time period along with other uses allowed by the Oxnard 2020 *General Plan* and projected regional growth. No long term “lag” period between the construction of individual development projects within the Specific Plan Area and the completion of the required intersection improvements is, therefore, anticipated. It should be noted that the estimate of fees presented in the Draft EIR is based on the amount of fees currently in place. The actual fees in effect at the time permits are issued for each individual development project will be paid. The actual total amount of fees paid will be greater than this estimate as the fees are adjusted for inflation over time. Given the conservative nature of the traffic analysis methodology, the long time period over which the project will build out and the fact that the improvements will be implemented through established capital improvement programs, the payment of traffic impact fees will result in mitigation of the identified traffic impacts.

VCPD-7

The Draft EIR correctly identifies that a significant cumulative freeway impact may occur along a portion of U.S. 101 freeway in the future. This projected impact is on the Ventura Freeway south of Central Avenue in the year 2020, as identified in Table 4.7-9 in the Draft EIR. This impact is identified in the northbound lanes during the AM Peak Hour and in the southbound lanes during the PM Peak Hour. The Oxnard Traffic Model projects that this section of the Ventura Freeway will operate at Level of Service E, carrying 182,400 daily trips, 7,940 AM Peak Hour northbound trips and 8,000 PM Peak Hour southbound trips in the year 2020 without the RiverPark Project. The RiverPark Project will add 5,300 daily trips, 318 AM Peak Hour trips to the southbound lanes and 287 PM Peak Hour trips to the northbound lanes to the

section of the Ventura Freeway south of Central Avenue. Due to the fact that this section of the Ventura Freeway is projected to operate at the upper end of Level of Service E the addition of the relatively small amount of traffic from the project (less than 3% of the projected daily volume, and less than 4% of the projected AM Peak Hour southbound and PM Peak Hour northbound trips) contributes to a significant cumulative impact as the Level of Service is projected to decrease to Level of Service F.

The Congestion Management Program (CMP) was enacted by Proposition 111 in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process to fund needed transportation improvements. A Countywide approach has been established by the Ventura County Transportation Commission, the Local CMP agency, to implement the statutory requirements of the CMP. The Countywide approach includes designating a highway network that includes all state highways and principal arterial roadways within the County and monitoring the network's Level of Service standards. This monitoring of the CMP network is one of the responsibilities of local jurisdictions. If level of service standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the Countywide plan.

This projected cumulative impact can be feasibly mitigated by one or more of several methods identified in the Congestion Management Plan (CMP) including an increase in the capacity of the Ventura Freeway, a diversion of traffic by improvements to parallel routes, or a decrease in corridor vehicle traffic by transit improvements or other Transportation Demand Management techniques. As this projected cumulative traffic impact is projected in the year 2020, there is sufficient time for the CMP monitoring and planning process to identify the improvements needed to this section of the Ventura Freeway of maintain an acceptable level of service and secure funding through the STIP.

VCPD-8

The RiverPark Specific Plan will not provide a reservation of right of way for an extension of Kimball Road. The County 2010 Regional Roadway Map presently shows an alignment for the extension of Kimball Road in Ventura across the Santa Clara River through the RiverPark Specific Plan Area to the Del Norte Boulevard interchange with the Ventura Freeway. It should be noted that this extension of Kimball Road is not consistent with the Oxnard 2020 *General Plan*. The Circulation Element of the Oxnard General Plan does not show this new roadway.

The City notes that following text is on page 4 of the Ventura County General Plan Public Facilities and Services Appendix under the heading of Transportation:

"The 2010 Map also depicts the areas that each city might annex in the future by indicating a city's Sphere of Influence. Within each city sphere, the city's proposed major streets (as depicted on their respective street plans) are also shown."

The City of Oxnard's Sphere of Influence is correctly shown on the County 2010 Regional Roadway Network Map. The Kimball Road extension as shown, however, is not consistent with the City's Circulation Element and, for this reason, does not appear to be consistent with the intent of the 2010 Regional Roadway Network Map as described above.

Appendix A of the project traffic study, contained in Appendix 4.7 of the Draft EIR, contains a full analysis of traffic conditions in the area with the Kimball Road extension. A run of the Oxnard Traffic Model was completed to examine traffic conditions in the area with an extension of Kimball Road across the Santa Clara River connecting to Santa Clara River Boulevard as planned in the Specific Plan Area. First, it should be noted that the traffic analysis of the project demonstrates that acceptable levels of service can be maintained on roadways and at intersections in Ventura and Oxnard and surrounding county areas without the Kimball Road extension. This model run shows that extending Kimball Road across the Santa Clara River would not result in any substantial improvement in the operating conditions of any of the roadways or intersections in the area or avoidance of any of the impacts of the RiverPark Project. This analysis of the need for, and benefit of, the extension of Kimball Road as shown on the County 2010 Regional Roadway Network Map is addressed on page 4.7-33 of the Draft EIR. As demonstrated by this analysis, no significant traffic impacts will result if Kimball Road is not extended as shown on the County 2010 Regional Roadway Network Map.

The City of Ventura Comprehensive Plan and the Comprehensive Plan EIR do not include any information that justifies the need for this roadway extension. Kimball Road is identified on the Ventura Comprehensive Plan Circulation Map as a "Future Extension" of an arterial roadway as opposed to a "Future Widening" to be accomplished by the horizon year of the Ventura Comprehensive Plan. The extension of North Bank Drive north to the Kimball Road extension is also shown as this type of Future Extension on the Ventura Circulation Element Map. The Circulation Element text does not define the term "Future Extension." The only specific reference to roadway extensions is the text in Policy 1.2 under the heading Objective 1 - Long-Range Circulation Plan – in the Circulation Element, which reads:

"The long-range circulation system depicts proposed roadway extensions across agricultural lands. These proposed roadways are not intended to be extended until development which is consistent with the Comprehensive Plan occurs, or until they become necessary to accommodate traffic. Such roads should be designed as urban parkways."

The Introduction to the Circulation Element states:

"The changes or increases in demands on the City's roadways and circulation system that may result from land use changes in implementing this Plan are described in the Traffic and Circulation Section (6.18) of the Master Environmental Impact Report for the Comprehensive Plan Update to the Year 2010 (April 1989). This section of the EIR is incorporated in this Plan by reference. The Circulation Plan Map reflects the analysis of impacts resulting from potential changes in land use"

The EIR for the City of Ventura Comprehensive Plan examined several land use alternatives for the Comprehensive Plan and concluded that the higher density alternatives would require more traffic capacity at the south edge of the City to reduce impacts on Johnson Drive. The lowest density land use alternative was adopted in the Comprehensive Plan, and this land use alternative would not require added capacity at the south edge of the City. Further, no actual traffic study was made of the benefits of the Kimball Road extension. Any benefit from the bridge was an assumed model input, rather than a demonstrated benefit shown by comprehensive traffic modeling. The traffic modeling included in the Comprehensive Plan EIR assumed volumes on the Kimball Road extension rather than modeling potential river crossing volumes southward until they come to a common cordon point. The assumptions made in the traffic analysis in the Comprehensive Plan EIR, do not, therefore, justify the need for the Kimball Road extension.

The City of Ventura placed the Kimball Road crossing as a future roadway extension on its Circulation Element Map. It should be noted that the alignment shown on the Circulation Element Map is not the same alignment considered in the traffic analysis in the Comprehensive Plan EIR. The alignment for the Kimball Road extension as shown on the Ventura Circulation Element Map and the County 2020 Roadway Network Map is shown on the exhibit (**Figure 2-6**) in the following page. The alignment on the Ventura Circulation Element Map would extend across the open mine pits on the Hanson Aggregates Mine site and connect to Vineyard Avenue at the northern edge of the El Rio Residential Community. The traffic analysis in the Comprehensive Plan EIR considered an alignment further south. The information in the Comprehensive Plan EIR does not justify the current alignment for the Kimball Road extension as required by Policy 1.2 of the Ventura Circulation Element.

In order to fully assess the need for the Kimball Road extension, the City of Oxnard prepared a traffic model run with this roadway link which was provided in Appendix A of the River Park Specific Plan traffic study. This analysis concluded the original alignment of the Kimball Road extension identified in the Ventura Comprehensive Plan EIR would not result in any substantial improvement in traffic conditions on roadways in the area, including Johnson Drive in Ventura. The traffic modeling completed with an extension of Kimball Road to Santa Clara River Boulevard in the project shows that there would be a minimal change of less than seven percent in the ICU value for peak hour traffic conditions at the Johnson Drive/North US-101 Ramps (North Bank) intersection, resulting in no change



FIGURE 2-6

Kimball Road Extension

to the Level of Service. Adding the Kimball Road extension to the area roadway network resulted in the actual traffic volumes at this Johnson Drive intersection dropping less than three percent (approximately 160 trips). The results of the traffic modeling are shown in **Table 13** below.

Table 13
Johnson Drive/North US-101 Ramps (North Bank)
Intersection Analysis

	AM Peak Hour			PM Peak Hour		
	ICU	LOS	Volume	ICU	LOS	Volume
Without Bridge	1.357	F	6,051	1.669	F	8,052
With Bridge	1.310	F	5,895	1.560	F	7,897
Bridge Benefit	(0.047)	--	(156)	(0.109)	--	(155)
% Benefit	3.5%	--	2.6%	6.5%	--	1.9%

Further, given the ongoing improvements to US 101 over-crossing of the Santa Clara River, no justification can be made for an additional river crossing in the area. The Kimball Road extension alternative studied in the River Park traffic study was selected not only because it was analyzed in the City of Ventura Comprehensive Plan EIR, but because it was the most probable alignment in the opinion of those preparing the River Park Specific Plan traffic study as well. Also, this alignment was that crossing most likely to benefit the Johnson Drive interchange, the stated goal of extending Kimball Road identified in the City of Ventura Comprehensive Plan EIR.

As a supplement to the traffic modeling contained in Appendix A to the Draft EIR, additional runs of the City of Oxnard traffic model were completed to determine the potential benefits of the Kimball Road extension in the alignment shown on the Ventura Circulation Element Map. As stated above, Appendix A addressed the most beneficial crossing, which was the alignment included in the traffic study for the City of Ventura Comprehensive Plan. Based on the Comprehensive Plan adopted by the City of Ventura, the County of Ventura placed a Kimball Road extension on the County 2020 Roadway Network Map in the more northerly alignment shown on the exhibit on the previous page. As stated above this alignment would cross the open mine pits on the Hanson Aggregates Mine Site, cross Vineyard Avenue through the prime agricultural lands immediately north of the El Rio and Nyeland Acres residential neighborhoods and connect to the Ventura Freeway in Oxnard at the Del Norte Boulevard interchange. It should be noted that this roadway extension was added to the County of Ventura Roadway Network Map at the request of the City of Ventura General Plan, but no additional traffic analysis was conducted by the County to demonstrate the need for this roadway extension.

To analyze the alignment currently shown on the County's Roadway Network Map, additional traffic model runs were also prepared to supplement the traffic model runs in Appendix A to the Draft EIR. This analysis showed that this alignment for extension of Kimball Road would result in even less change in traffic conditions at the Johnson Drive/North US 101 Ramps (North Bank) intersection than the alignment further south. Peak hour traffic volumes at this intersection would drop a maximum of 120 trips in the P.M. peak hour, resulting in a change in the ICU value of 1.5 percent or less as shown in **Table 14** below. No change to the level of service of the Johnson Drive/North US-101 Ramps (North Bank) Intersection would result.

Thus, the Kimball Road extension as currently shown on the City of Ventura Circulation Element and County of Ventura Roadway Network Map would be less effective traffic measure than that alignment considered in the City of Ventura's Comprehensive Plan EIR and analyzed in Appendix A of the traffic study for River Park. However, neither alignment would improve the operating condition of Johnson Drive at the northbound US 101 ramps to a substantial degree as demonstrated by the information presented in **Tables 1 and 2**.

Table 14
Johnson Drive/North US-101 Ramps (North Bank)
Intersection Analysis

	AM Peak Hour			PM Peak Hour		
	ICU	LOS	Volume	ICU	LOS	Volume
Without Bridge	1.357	F	6,051	1.669	F	8,052
With Bridge	1.344	F	5,986	1.619	F	7,931
Bridge Benefit	(0.013)	--	(65)	(0.050)	--	(121)
% Benefit	1.0%	--	1.1%	3.0%	--	1.5%

The minor benefit provided by extending Kimball Road across the Santa Clara River must also be viewed in terms of environmental and monetary costs. The EIR for the City of Ventura Comprehensive Plan estimated a cost of over \$12 million to extend Kimball Road across the river more than 10 years ago. This cost has risen with the passage of time. The estimated cost for the US 101 bridge would indicate that, ignoring the surface streets leading to the bridge, the actual cost already will be well in excess of that estimate. When the roadways within the City of Ventura and Oxnard are combined with the roadway through the prime agricultural land in the County, the monetary cost for this roadway extension would be prohibitive. It should also be noted that the Kimball Road extension is currently an unfunded improvement which is not part of the traffic fee program for the City of Ventura.

The discussion above of the cost of extending Kimball Road does not account for the environmental consequences of a Kimball Road bridge. The current alignment would require the extension of Kimball Road across agricultural land in Ventura, including land recently purchased by the Nature Conservancy with a grant from the California Coastal Conservancy. This 220-acre site represents the first purchase of property for the Santa Clara River Parkway planned by the California Coastal Conservancy along the southern reaches of the Santa Clara River. This new parkway is described on pages 2.0-13 and 2.0-14 of the Draft EIR. The acquisition of land along a 12 mile stretch of the river is proposed to facilitate restoration and enhancement of natural river habitat along this portion of the river. The extension of Kimball Road through the land recently purchased by the Nature Conservancy would be inconsistent with this important regional conservation effort, as would the construction of another bridge across this portion of the river, which contains sensitive natural habitat. In addition, the planned alignment would require extensive filling of the existing mine pits to allow the road to cross. Further, this road extension would impact prime agricultural land located in the Oxnard-Camarillo-Ventura Greenbelt to the north of El Rio and Nyeland Acres. Thus, the marginal traffic benefits of this road extension bridge hardly justify its high monetary and significant environmental impacts. In addition, the feasibility of obtaining the required permits and approvals to build the road and bridge are questionable.

Extension of Kimball Road would not be consistent with the applicable policy of the Ventura Circulation Element which states that the future roadways shown on the Ventura Circulation Element Map are not intended to be extended until development which is consistent with the Comprehensive Plan occurs, or until they become necessary to accommodate traffic. The Ventura Comprehensive Plan does not allow development around the Kimball Road extension and the information presented above demonstrates that the extension of Kimball Road is neither justified or necessary to maintain acceptable traffic conditions in Ventura, Oxnard or the surrounding areas. This roadway extension has never been a component of the Oxnard General Plan Circulation Element. No significant impacts will result, therefore, from adoption of a specific plan for the RiverPark Specific Plan Area that precludes the extension of Kimball Road.

VCPD-9

The analysis of sewer service in Section 4.11.3 of the Draft EIR was based on information in the recently updated City of Oxnard Wastewater Collection System Master Plan. As discussed on page 4.11.3-7 of the Draft EIR, the Wastewater Collection System Master Plan considers flows from El Rio and provides capacity for the El Rio Community to hook up to the City's sewer system. No revision to the analysis of sewer capacity in the EIR, therefore, is required.