

**MOORPARK CITY COUNCIL
AGENDA REPORT**

TO: Honorable City Council

FROM: David A. Bobardt, Community Development Director
Prepared By: Joseph R. Vacca, Principal Planner



DATE: May 22, 2012 (CC Meeting of 06/06/2012)

SUBJECT: Consider Response to Caltrans on Draft Environmental Impact Report (EIR) for Proposed State Route 118 Intersection Improvements at State Route 34 (Somis Road)

BACKGROUND/DISCUSSION

On October 30, 2008, Caltrans distributed a Notice of Preparation for a Draft Environmental Impact Report, (EIR) to evaluate six alternative intersection improvements to the SR-118 highway intersection with SR-34 highway, in Somis to alleviate congestion and reduce the risk for traffic accidents in this area. The purpose of a Notice of Preparation is to allow government agencies and the public the opportunity to identify critical issues or alternatives they wish to see evaluated in the EIR. A copy of the comment letter that was prepared by staff and submitted to Caltrans on November 21, 2008, is provided, (Attachment 1).

Chapter 1 of the Draft EIR outlines the proposed project (Attachment 2). The Draft EIR indicates that the SR-118 intersection at Somis Road, (SR-34) currently operates at Level of Service, (LOS) F, with a 108 second delay during morning peak hours and a 188.9 second delay during afternoon peak hours. These values demonstrate that more vehicles approach the intersection at these times than it has physical capacity to accommodate. Furthermore, the Draft EIR reports that accident rates at the intersection and its approaches are higher than the statewide average for similar highway segments; with rear end type accidents comprising the majority of accidents at, or approaching this intersection.

Page 5 of Draft EIR (Chapter 1), shows a table that outlines average daily traffic, (ADT) as follows:

- Existing ADT - Westbound SR-118 has an ADT of 11,200 with 26.79 percent being trucks; and Eastbound SR-118 has an ADT of 17,700 with 20.63 percent being trucks.
- Projected to Year 2035 ADT - Westbound SR-118 projected ADT of 12,400 with 26.79 percent being trucks; and Eastbound SR-118 projected ADT of 19,600 with 20.63 percent being trucks.

From existing to projected year 2035 levels, the number of trucks would increase on Westbound SR-118 from 3,000 existing trucks to 3,322 trucks, (an increase of 322 trucks daily in 2035).

From existing to projected year 2035 levels, the number of trucks would increase on Eastbound SR-118 from 3,652 existing trucks to 4,043 trucks, (an increase of 391 trucks daily in 2035).

Furthermore, regarding truck traffic on the SR-118, page 62 of the DEIR (Chapter 2), states the following: "The high volume of trucks on this segment of SR-118 and the low volume on SR-23 suggest that the trucks are using a route that does not require passing through the existing Commercial Vehicle Enforcement Facilities, (CVEF) on US-101, west of SR-23." The projections in the Draft EIR do not appear to adequately correlate with the recognition that there is an ever increasing volume of trucks on this segment of the SR-118. This should be analyzed further in the Draft EIR.

The six improvement alternatives originally proposed with the NOP, have been reduced to three alternatives, including the "no project" alternative. The two build alternatives would alleviate the congestion to varying degrees and improve safety approaching and passing through the intersection. Both build alternatives would improve LOS to the minimum acceptable level set forth in the Ventura County General Plan. However, the Draft EIR did not adequately analyze the impacts associated with potential increased truck traffic, as the improvements would increase the desirability of the SR-118 highway over other routes. The draft EIR indicates on page 48, that the proposed project would not indirectly induce substantial growth, and would not result in growth related impacts, however improved LOS at this intersection will result in increased use of this transportation corridor and this has not been adequately analyzed in the Draft EIR.

Other traffic/circulation items that do not appear to be analyzed in the Draft EIR, which may have impacts on traffic at the project intersection of SR-118 and SR-34, as follows:

- Rice Road / Santa Clara Road improvements at US-101 and the potential for increased traffic on SR-118 have not been included in the cumulative impacts in the Draft EIR.
- Port Hueneme truck projections on Lewis Road, (SR-34) have not been included in the cumulative impacts in the Draft EIR.
- Analysis of traffic related to California State University Channel Islands has not been included in the cumulative impacts in the Draft EIR.

A draft comment letter requesting that these issues be addressed in the Draft EIR is provided (Attachment 3).

FISCAL IMPACT

None

STAFF RECOMMENDATION

Direct staff to send a comment letter to Caltrans to address the unresolved issues in the Environmental Impact Report, as drafted.

Attachments:

1. Staff comment letter on Notice of Preparation, dated November 21, 2008
2. Copies of Chapter 1 of the Draft EIR, Proposed Project, dated May 2012
3. Draft staff comment letter to Caltrans, June __, 2012



City of Moorpark

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING – BUILDING AND SAFETY – CODE COMPLIANCE

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6200 fax (805) 532-2540

November 21, 2008

Ron Kosinski
Deputy District Director
Caltrans, Division of Environmental Planning
100 South Main Street, Suite 100
Los Angeles, CA 90012

Dear Mr. Kosinski,

RE: Notice of Preparation of a Draft Environmental Impact Report for the State Route 118 Intersection Improvements at State Route 34 (Somis Road) and Donlon Road

Thank you for requesting input on the scope of the Draft Environmental Impact Report that Caltrans will be preparing for the proposed improvement alternatives to the SR-118 intersections at Somis and Donlon Roads. The City recognizes that these improvement alternatives, with the exception of the "no project" alternative, would alleviate to varying degrees severely congested conditions to the SR-118 in Somis during the morning and afternoon peak traffic periods. These improvements, however, could also increase the desirability of the SR-118 as a truck route by reducing the travel time along this route, as compared to other routes. The City of Moorpark is requesting that the Environmental Impact Report include analysis and mitigation of the expected increase to truck traffic and related air quality, noise and safety impacts on the SR-118 (Los Angeles Avenue) through Moorpark from each of the proposed improvement alternatives. Please include me as your contact for the City of Moorpark on this project.

Thank you for your consideration of these comments.

Sincerely,

David A. Bobardt
Planning Director

C: Honorable City Council
Honorable Planning Commission
Honorable Peter C. Foy, Chair, Ventura County Board of Supervisors
Steven Kueny, City Manager
Barry K. Hogan, Deputy City Manager
Yugal Lall, Public Works Director/City Engineer
Darren Kettle, Executive Director, Ventura County Transportation Commission
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PATRICK HUNTER
Mayor

JANICE PARVIN
Mayor Pro Tem

ROSEANN MIKOS
Councilmember

KEITH F. MILLHOUSE
Councilmember

MARK VAN DAM
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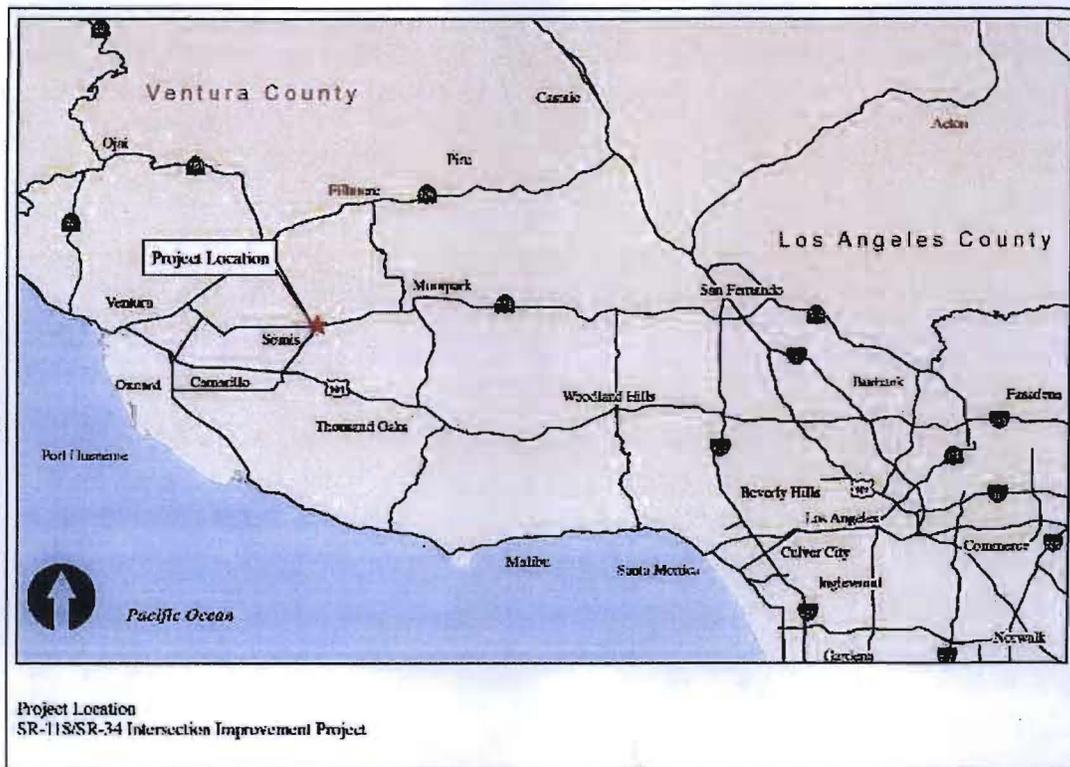
CC ATTACHMENT 1

Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans) is proposing improvements at the SR-118/SR-34 intersection, in the Somis area of unincorporated Ventura County. The project limits extend approximately 1.1 mile on SR-118 and approximately 0.86 mile on SR-34. Figure 1.1-1 shows the project location within its regional context. The proposed project is a joint project by Caltrans and the Federal Highway Administration (FHWA), and is subject to state and federal environmental review requirements. Caltrans is the lead agency under both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The proposed project is included in the Southern California Association of Governments' (SCAG) 2008 Regional Transportation Plan (2008 RTP) and the SCAG 2008 RTP amendment #2, with funding for preliminary engineering only. The proposed project is also included in the SCAG 2008 RTIP amendment #08-24 modeling list.

Figure 1.1-1 Regional Project Location



1.1.1 Project Background

In 1993, the Ventura County Public Works Agency (VCPWA) requested a joint venture with Caltrans for a project that proposed to widen the SR-118/SR-34 intersection, and realign Donlon Road (Rd.) to create a four-way intersection. A Negative Declaration/Finding of No Significant Impact (ND/FONSI) for the project was approved on September 26, 2000. In November 2000, the Save Our Somis (SOS) community organization filed a lawsuit contending that Caltrans violated the CEQA by declining to prepare an EIR for the proposed project. In late 2002, the Ventura County Superior Court vacated approval of the proposed project and held that an EIR was necessary. Caltrans is preparing this DEIR in order to fulfill state environmental review and CEQA requirements. Federal environmental review and NEPA requirements for the proposed project have been met with the approval of the FONSI.

The ND/FONSI (Caltrans, September 2000) for the proposed project presented six alternatives, one No-Build alternative and five Build Alternatives. The realignment of Donlon Rd. was included as part of the scope of work for four of the five Build Alternatives presented in the ND/FONSI (Caltrans, September 2000). All six of the alternatives considered in the ND/FONSI (Caltrans, September 2000) were revisited for the purpose of this DEIR.

A Notice of Preparation (NOP) for the DEIR was issued by Caltrans on October 30, 2008. The NOP was sent to the State Clearinghouse, Responsible Agencies, Trustee Agencies, Local Agencies, Community Groups, and members of the public. An NOP informs the reviewer of the lead agency's intent to prepare an EIR. An Alternatives Workshop was held on Thursday, May 7, 2009 and a Community Meeting was held on Wednesday, August 26, 2009, at the Somis School Auditorium. The Alternatives Workshop was advertised in the Ventura County Star. Also, over 150 invitations were sent to local government agencies, organizations and the public before each of the meetings. Meetings were also held with members of the SOS community organization on June 29, 2009 at the Caltrans District 7 Headquarters Building, and on October 28, 2010 at the Caltrans Ventura County Satellite Office. The purpose of these meetings was to provide an overview on the proposed project's purpose and alternatives, and to solicit input from all interested parties. Project information was also made available for a period of time on the Caltrans District 7 website.

The VCPWA issued a Notice of Intent (NOI) to Adopt a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Donlon Rd. Realignment Project (VCPWA Project) on September 10, 2010. The VCPWA project involves the realignment of Donlon Rd. to replace the SR-118/SR-34 "T" intersection with a four-way intersection. It is anticipated that the VCPWA project will be completed prior to the proposed project. The realignment of Donlon Rd. is no longer a part of the proposed project. Due to this change in the scope of the project,

the Roundabout Alternative and the Bridge Alternative, both presented in the Caltrans NOP and at community meetings, are no longer considered feasible.

1.1.2 Project Location

The project location is the SR-118/SR-34 intersection, approximately 1.5 miles north of the City of Camarillo and 4.5 miles west of the City of Moorpark. Figure 1.1-2 identifies the project location in the Somis Area. State Route 118 is an east-west interregional highway that travels through the counties of Ventura and Los Angeles. The segment of SR-118 within the project area is primarily a two-lane conventional highway, also known as Los Angeles Avenue (Ave.), which provides regional connectivity to SR-23 to the east, US-101 to the south, and SR-126 to the west. At the project location, SR-118 forms two closely-spaced “T” intersections with SR-34 and Donlon Rd. State Route 34 is a two-lane conventional highway that travels through the cities of Oxnard and Camarillo, ending at the intersection with SR-118. The highway is also known as Somis Rd. in the project area.

1.1.3 Existing Facilities

The SR-118/SR-34 intersection is located between Post Mile (PM) 10.80 and PM 11.05 on SR-118, and at PM 17.66 on SR-34. The existing intersection configuration is shown in Figure 1.2-1. The intersection is controlled by traffic signal, and is located approximately 270 ft. west of the SR-118/Donlon Rd. “T” intersection. Donlon Rd. is a two-lane County roadway that forms the north leg of the “T” intersection with SR-118. There is a 30 ft. left-turn lane on eastbound (EB) SR-118, allowing access to Donlon Rd. Donlon Rd. is controlled by a stop sign.

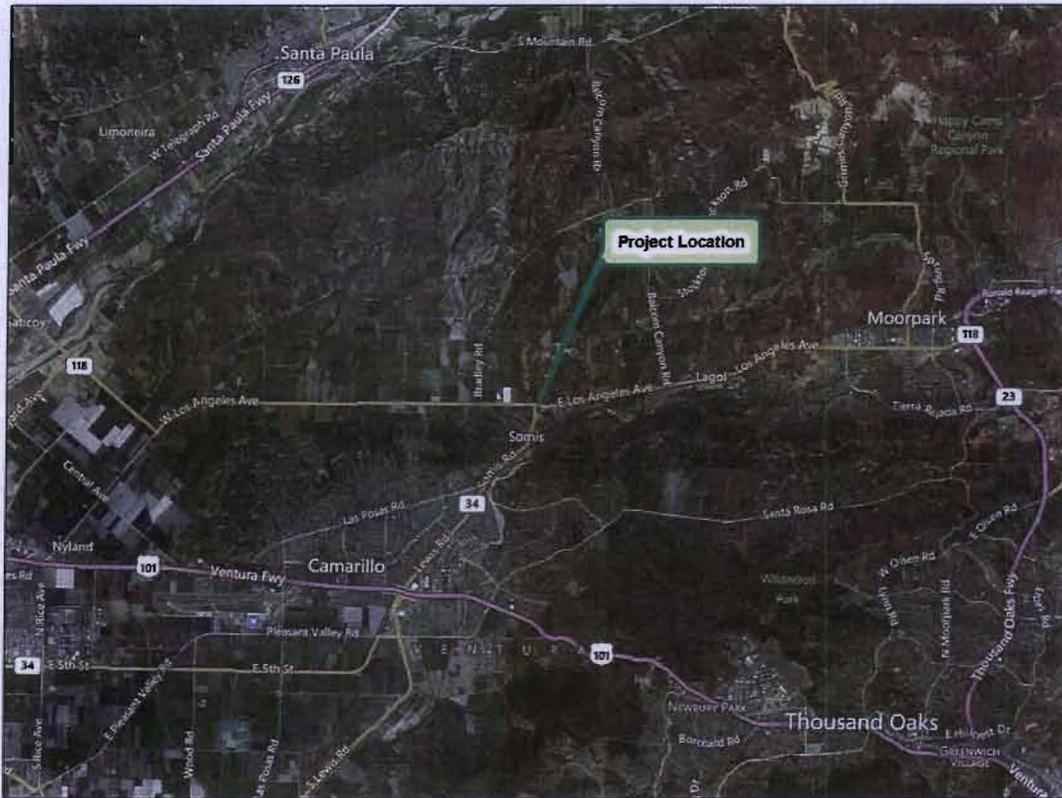
Within the project limits, both SR-118 and SR-34 are two-lane conventional highways that carry one 12 ft. lane and a 4 ft. shoulder in each direction. There are no existing sidewalks or dedicated bike lanes within the project limits. The width of the existing right-of-way on SR-34, south of the intersection, and on SR-118, west of the intersection, is 60 feet. The width of the existing right-of-way on SR-118, east of the intersection, is 100 feet. State Route 118 is on the National Highway System (NHS). Both routes are on the California Freeway and Expressway System. Both routes are also part of the Ventura County Regional Road Network. According to the Ventura County General Plan, the SR-118 portion of the Regional Road Network within the project limits does not adequately meet present travel demands.

1.1.4 Surrounding Land Uses

The project area is characterized by low-intensity land uses, predominantly Agricultural. Agricultural uses in the project area include farmlands, commercial nurseries, and ranches/residences. Downtown Somis is located along SR-34, approximately a half-mile south of the intersection. The six-square-block downtown includes a mixture of residential, commercial, and agricultural zoning. The rest of the town consists mostly of single-family

residences, concentrated west of SR-34. There are also two areas in town that are zoned for light industrial/quasi-industrial activities.

Figure 1.1-2 Project Location



1.2 Purpose and Need

The SR-118/SR-34 intersection currently operates poorly due to high traffic volumes and limited queuing capacity. Motorists experience heavy traffic congestion at the intersection during both the morning and evening peak commute hours. The intersection has numerous operational deficiencies as a result of a rise in traffic volume over the years. The high volume of vehicles passing through the intersection during peak commute hours results in substantial delays, and is a factor in congestion-related accidents within the project area.

The purpose of the proposed project is to improve overall traffic operations at the SR-118/SR-34 intersection. To achieve this goal, the following project objectives have been identified:

- reduce delay time;
- relieve congestion;
- and enhance safety.

1.2.1 Average Daily Traffic (ADT)

Average Daily Traffic (ADT) is the average number of vehicles passing a specified point during a 24-hour period. Traffic projections for the project area were developed for the opening year (2015) and the horizon year (2035). The horizon year is the year for which the SCAG 2008 RTP describes the envisioned regional transportation system. Projected 2015 and 2035 ADT volumes are based on the SCAG 2035 RTP Baseline Model. Table 1.2-1 shows the existing, projected 2015 and 2035 ADT, and existing truck percentage.

Table 1.2-1 Existing and Projected 2015/2035 Average Daily Traffic (ADT)

	WB SR-118	EB SR-118	SB SR-34	NB SR-34
ADT	11,200	17,700	12,200	15,200
Truck Percentage	26.79	20.63	14.65	14.38
Projected 2015 ADT	11,250	17,750	12,250	15,250
Projected 2035 ADT	12,400	19,600	13,030	16,250

Source: State of California-Department of Transportation, Office of Advanced Planning, 03/08/2010

1.2.2 Level of Service (LOS)

Traffic conditions at the SR-118/SR-34 and SR-118/Donlon Rd. intersections were analyzed using the capacity analysis methodology for signalized intersections presented in the Highway Capacity Manual – 2000 Edition (HCM 2000). The HCM 2000, prepared by the National Transportation Research Board, provides a consistent system of techniques for the evaluation of the quality of service on highway and street facilities.

The six defined Levels of Service use letter designations from A to F, with LOS A representing the best operating conditions and LOS F representing the worst. Each LOS represents a range of operating conditions and the driver's perception of those conditions. Levels E and F typically are considered to be unsatisfactory. Table 1.2-2 shows LOS definitions for signalized intersections with corresponding average vehicular delay estimated using the HCM capacity analysis methodology for signalized intersection.

Table 1.2.2 Level of Service (LOS) and Delay

LOS	Interpretation	Average Delay (seconds)
A	Uncongested operations; all vehicles clear in a single cycle.	0.0-10.0
B	Uncongested operations; all vehicles clear in a single cycle.	10.1-20.0
C	Light congestion; occasional backups on critical approaches.	20.1-35.0
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	35.1-55.0
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	55.1-80.0
F	Total breakdown with stop-and-go operations.	>80.0

The capacity analysis methodology for signalized intersections addresses the LOS and other performance measures for lane groups and intersection approaches. The methodology also addresses the LOS for the intersection as a whole. Tables 1.2-3 and 1.2-4 show existing peak commute hour volumes, delay and LOS for each approach, as well as the delay and LOS for the whole intersection. Tables 1.2-5 and 1.2-6 show the same traffic data for the horizon year 2035. Traffic data shows that the LOS at the SR-118/SR-34 intersection is currently classified as F, with a delay of 108 seconds per vehicle during morning peak commute hours, and 188.9 seconds per vehicle during evening peak commute hours. The traffic data also shows that without improvements, future peak commute hour volumes at the intersection are expected to increase, with LOS remaining at F during peak commute hours. These conditions would result in delays of 267.5 seconds per vehicle during morning peak commute hours and 315 seconds per vehicle during evening peak commute hours.

1.2.3 Operational Deficiencies

Motorists currently experience traffic congestion and delays at the SR-118/SR-34 intersection during both the morning and evening peak commute hours. Insufficient storage for vehicles making left turns from WB SR-118 to SB SR-34 poses a problem at the intersection, as this causes vehicles to back up onto the WB SR-118 through lane. The congestion at the intersection is worsened by the proximity of the SR-118/Donlon Rd. "T" intersection. The close spacing of the two intersections leads to weaving and a build-up of traffic.

Table 1.2.3 Existing AM Peak Hour Traffic Volumes, Delay and LOS

		Peak Hour Traffic	Approach Delay (sec.)	Approach LOS	Intersection Delay (sec.)	Intersection LOS
Eastbound SR-118	Through	352	92.1	F	108.0	F
	Right-Turn	8				
Westbound SR-118	Left-Turn	502	162.7	F		
	Through	358				
SR-34	Left-Turn	63	32.5	C		
	Right-Turn	484				

Source: State of California-Department of Transportation, Traffic Study Report, June 2010

Table 1.2.4 Projected 2035 AM Peak Hour Traffic Volumes, Delay and LOS

		Peak Hour Traffic	Approach Delay (sec.)	Approach LOS	Intersection Delay (sec.)	Intersection LOS
Eastbound SR-118	Through	420	150.9	F	267.5	F
	Right-Turn	10				
Westbound SR-118	Left-Turn	600	464.3	F		
	Through	410				
SR-34	Left-Turn	70	35.0	D		
	Right-Turn	570				

Source: State of California-Department of Transportation, Traffic Study Report, June 2010

Table 1.2.5 Existing PM Peak Hour Traffic Volumes, Delay and LOS

		Peak Hour Traffic	Approach Delay (sec.)	Approach LOS	Intersection Delay (sec.)	Intersection LOS
Eastbound SR-118	Through	345	73.3	E	188.9	F
	Right-Turn	12				
Westbound SR-118	Left-Turn	409	339.0	F		
	Through	464				
SR-34	Left-Turn	98	45.8	D		
	Right-Turn	529				

Source: State of California-Department of Transportation, Traffic Study Report, June 2010

Table 1.2-6 Projected 2035 PM Peak Hour Traffic Volumes, Delay and LOS

		Peak Hour Traffic	Approach Delay (sec.)	Approach LOS	Intersection Delay (sec.)	Intersection LOS
Eastbound SR-118	Through	410	85.4	F	315.0	F
	Right-Turn	12				
Westbound SR-118	Left-Turn	480	608.4	F		
	Through	510				
SR-34	Left-Turn	120	56.2	E		
	Right-Turn	630				

Source: State of California-Department of Transportation, Traffic Study Report, June 2010

1.2.4 Accident Rates

During meetings held in the community of Somis, members of the community expressed concern about safety and traffic operations at the intersection. Traffic Accident Surveillance and Analysis System (TASAS) accident output reports of the intersection and intersection approaches were reviewed for the three-year period of April 1, 2006 to March 31, 2009. The total limits of the proposed project alternatives were considered in the accident analysis.

Table 1.2-7 summarizes the Caltrans District 7 TASAS Selective Accident Rate Calculation (Table B) report. The report contains both the actual accident rate within the project limits and the statewide average accident rate for similar highway segments. The accident rate is expressed as a ratio between the number of collisions that occur over a set time period on a certain roadway segment and the average traffic volume traveling over the length of that segment. The calculated ratio can then be compared to ratios calculated for similar highway segments to establish the relative safeness of a given segment. Accident rates are calculated to evaluate the relative safeness of a highway and to set priorities for safety improvement work.

Table 1.2-7 TASAS Selective Accident Rate Calculation (4/01/06-3/31/09)

Location	Post Mile	Accident Total	Accident Rate (A/MVM)	
			Actual Rate	Average Rate
SR-118/SR-34 Intersection	10.92	14	.47	.30
SR-118 Intersection Approach	10.70-11.80	54	2.68	.77
SR-34 Intersection Approach	16.80-17.66	41	3.29	1.35
A/MVM = Accidents per Million Vehicle Miles				

Source: Caltrans District 7 TASAS Selective Accident Rate Calculation (Table B)

The TASAS Selective Accident Rate Calculation (Table B) report indicates that the accident rate, expressed in accidents per million vehicle miles (A/MVM), at the SR-118/SR-34 intersection and intersection approaches is higher than the statewide average for similar highway segments. The corresponding TASAS Selective Accident Retrieval (TSAR) report indicates that some of the safety issues at the intersection are due to traffic congestion. The TSAR report is a detailed list of accidents and/or summary for any type or types of accidents on any section of highway, any ramp or any intersection in the State Highway System. Accidents may be selected by location, highway characteristics, accident data codes or any combination of these. A typical TSAR report contains accident summary fields that include principal collision

factor, environmental conditions, road condition, right of way control, type of collision, number of vehicles involved, etc.

Table 1.2-8 shows the accident type summary from the TSAR report reviewed for the accident analysis. The accident type summary indicates that the majority of accidents recorded within the project limits on SR-118 during the specified period involved rear end-collisions. The high percentage of rear-end type accidents occurring on SR-118 are indicative of stop-and-go traffic related to existing congested conditions. According to the TSAR report, stop-and-go traffic was a factor in 35 percent of the accidents along SR-118. The construction of the proposed project is expected to improve overall traffic operations at the SR-118/SR-34 intersection through congestion relief, which in turn would reduce the number of rear-end collisions, and improve safety at this location.

Table 1.2-8 TASAS Selective Accident Retrieval (4/1/06-3/31/09)

Type of Accident	SR-118/SR-34 Intersection (PM 10.92)		SR-118 (PM 10.70-11.80)		SR-34 (PM 16.80-17.66)	
	Number of Accidents	Percentage	Number of Accidents	Percentage	Number of Accidents	Percentage
Head-On	0	0%	0	0%	2	4.9%
Sideswipe	3	21.4%	2	3.6%	3	7.2%
Rear End	6	42.9%	38	69.1%	11	26.8%
Broadside	0	0%	7	12.7%	7	17.1%
Hit Object	4	28.6%	7	12.7%	13	31.7%
Overturn	1	7.1%	1	1.8%	3	7.3%
Other	0	0%	0	0%	2	4.9%

Source: Caltrans District 7 Traffic Accident Surveillance and Analysis System (TASAS)

1.2.5 Geometric Deficiencies

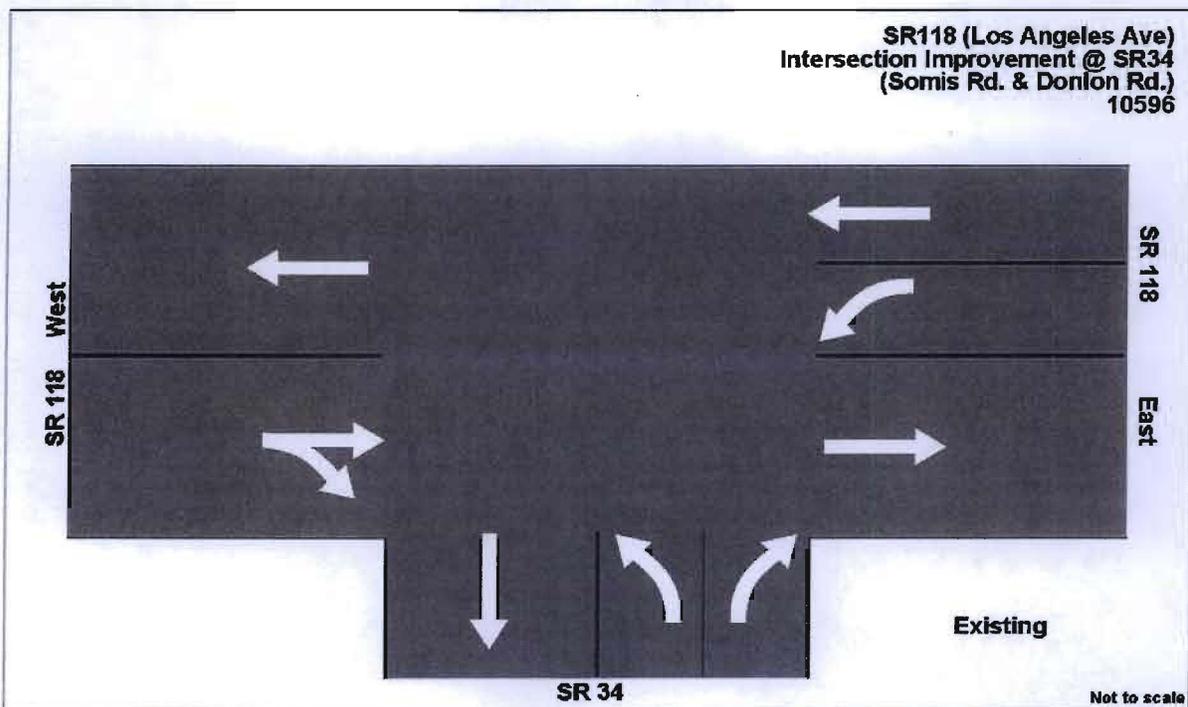
A major reason for the traffic congestion at the SR-118/SR-34 intersection is queuing at the traffic signal that extends beyond the length of the existing left-turn lane on WB SR-118. Approximately 480 vehicles currently make this turn during evening peak commute hours and 358 vehicles during morning peak commute hours. The Caltrans Highway Design Manual recommends that double left-turn lanes be considered at signalized intersections on multi-lane conventional highways if left-turn demand is 300 vehicles per hour or more.

1.3 Proposed Project Alternatives

1.3.1 No-Build Alternative

Figure 1.3-1 illustrates the existing SR-118/SR-34 intersection configuration. The No-Build Alternative proposes to maintain the existing configuration. Existing right-of-way width at the intersection is 60 ft. on SR-34 and SR-118, west of the intersection. The existing right-of-way width on SR-118, east of the intersection, is 100 feet.

Figure 1.3-1 Existing Intersection Configuration



1.3.2 Build Alternatives

The improvements proposed under both Build Alternatives extend approximately 1.1 miles on SR-118 and approximately 0.86 mile on SR-34. Both Build Alternatives differ from earlier versions, presented in the NOP and at community meetings, with respect to left-turn lane storage length, elimination of striped medians, and a reduction in the amount of right-of-way required from adjacent properties. Also, the Intersection Improvement Alternative now includes the addition of a merge lane on westbound SR-118, west of the intersection. The Build alternatives have some common design features, which are presented in the following section.

Common Design Features

The Intersection Improvement Alternative and Save Our Somis (SOS) Alternative both proposed the following:

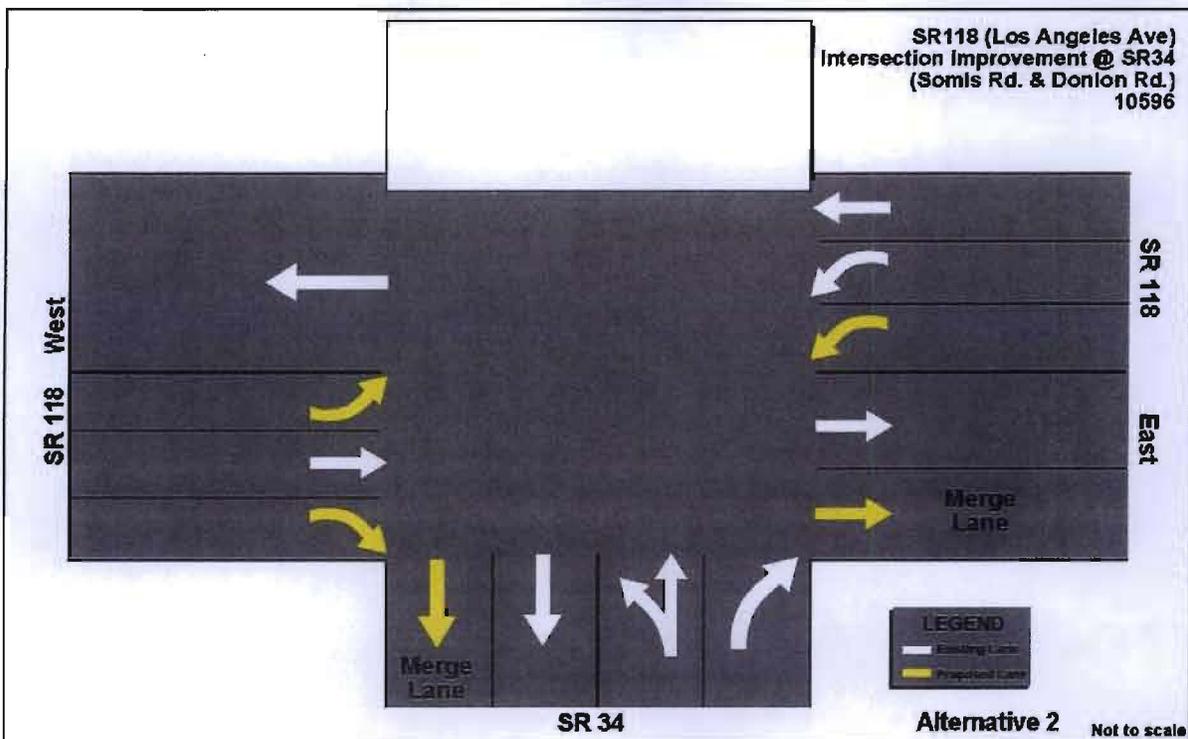
- widen shoulders along SR-118 and SR-34 to 8 ft.;
- reconstruct existing pavement;
- extend SR-118 arch culvert for Coyote Canyon;
- rock slope protection in Coyote Canyon;
- biofiltration swales;
- utility relocation (e.g., telephone poles, cable pull boxes, water meters);
- right-of-way acquisition;
- and drainage easements.

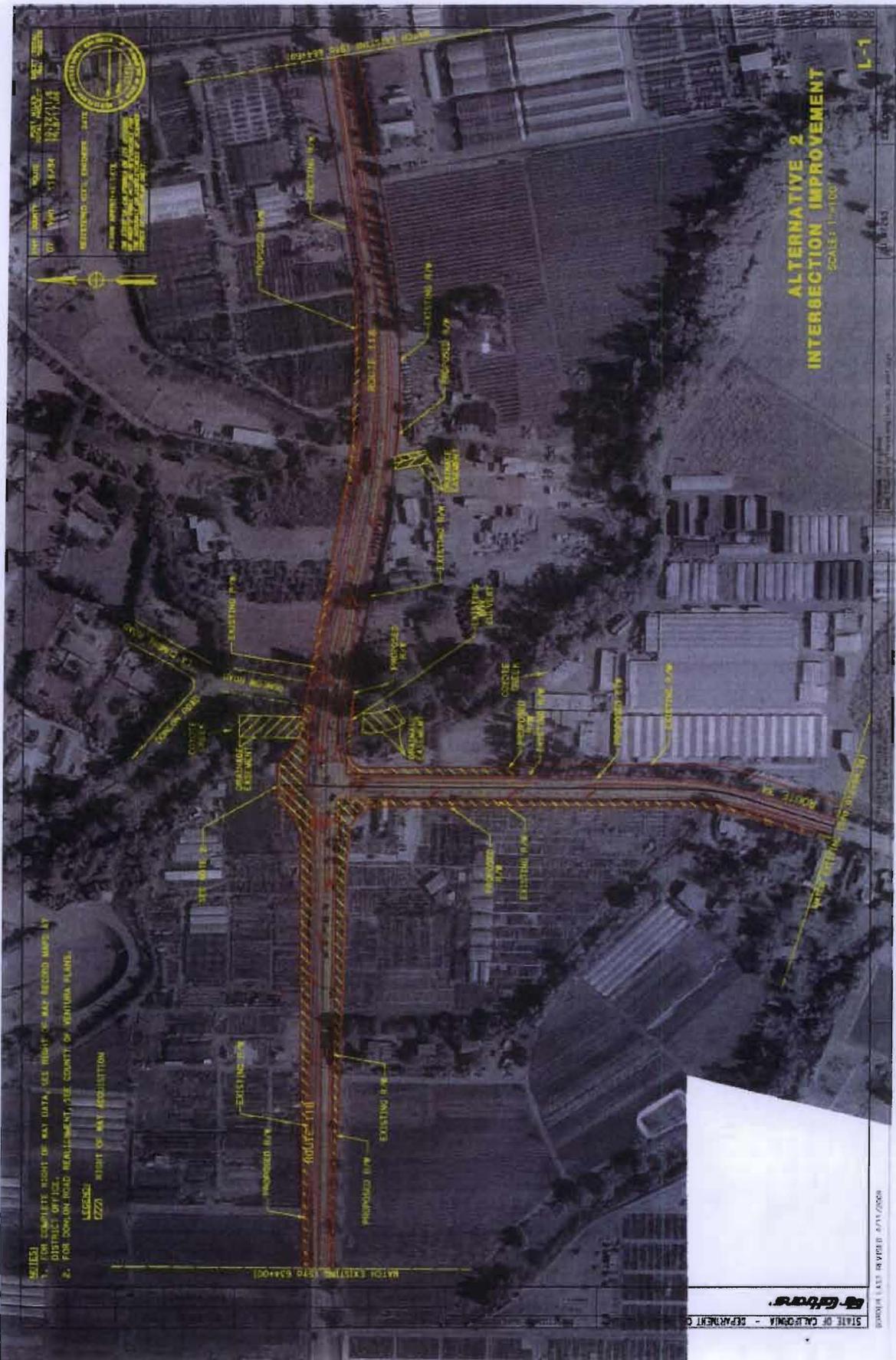
Intersection Improvement Alternative

Figure 1.3-2 depicts additional lanes proposed under this alternative, which requires approximately 2.44 acres of new right-of-way. The maximum proposed width on SR-118 is 115 ft., west of the intersection, and 142 ft., east of the intersection. The maximum proposed width on SR-34 is 119 ft. In addition to the common design features, the following is proposed:

- extend existing left-turn lane on westbound (WB) SR-118 from 160 ft. to 800 ft;
- add 800 ft. left-turn lane on WB SR-118;
- extend existing left-turn lane on northbound (NB) SR-34 from 170 ft. to 629 ft.
- add 640 ft. merge lane on southbound (SB) SR-34;
- add 800 ft. merge lane on eastbound (EB) SR-118;
- add 374 ft. right-turn lane on EB SR-118;
- add 454 ft. left-turn lane on EB SR-118;
- add 600 ft. merge lane on WB SR-118 (not shown in Figure 1.3-2).

Figure 1.3-2 Proposed Intersection Configuration



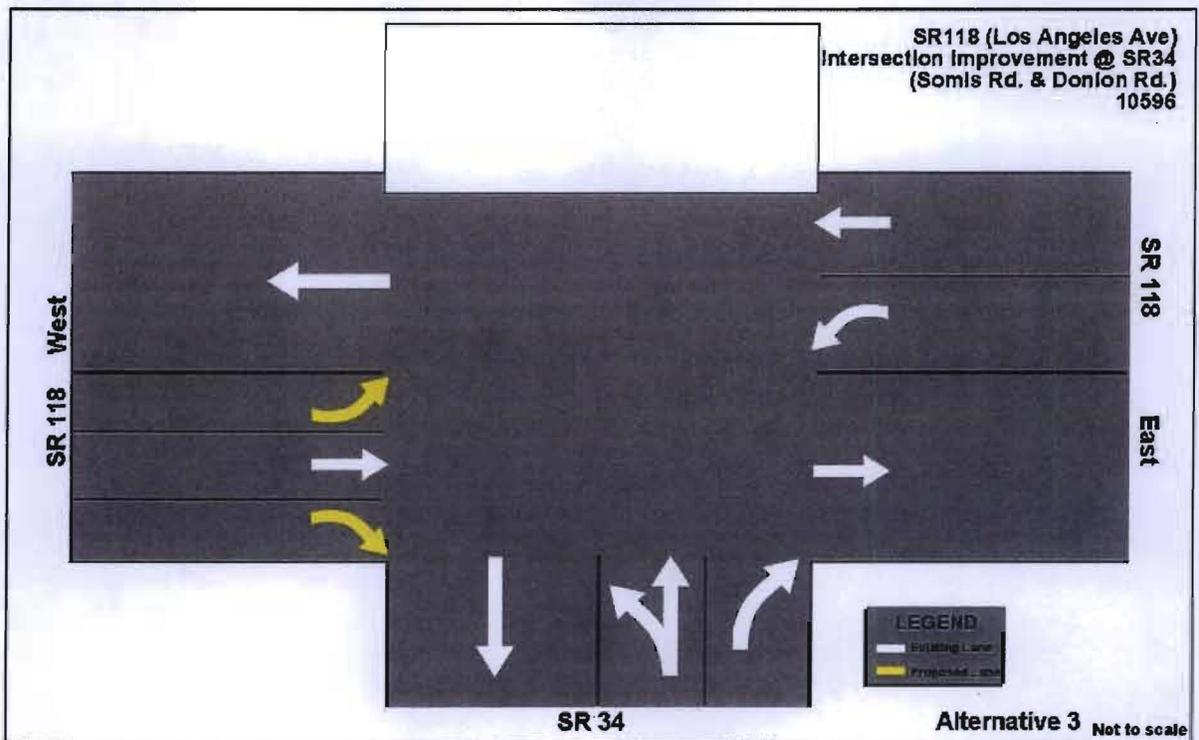


Save Our Somis (SOS) Alternative

Figure 1.3-3 depicts additional lanes proposed under this alternative, which requires approximately 1.62 acre of new right-of-way. The maximum proposed width on SR-118 is 100 ft., west of the intersection, and 107 ft., east of the intersection. The maximum proposed width on SR-34 is 92 ft. In addition to the common design features, the following is proposed:

- extend existing left-turn lane on WB SR-118 from 160 ft. to 1,164 ft.;
- extend existing left-turn lane on NB SR-34 from 170 ft. to 619 ft
- add 440 ft. right-turn lane on EB SR-118
- add 440 ft. left-turn lane on EB SR-118

Figure 1.3-3 Proposed Intersection Configuration



1.3.3 Comparison of Alternatives

Traffic analysis results, shown in Table 1.3.3-1, indicate that both of the Build Alternatives would substantially reduce delay time during future peak commute hours compared to the No-Build Alternative.

Table 1.3-3 Projected Peak Hour Delay

	Delay in Seconds	
	AM Peak Hour	PM Peak Hour
2015		
No-Build	135.5	194.9
Intersection Improvement	28.9	30.7
Save Our Somis	32.1	36.7
2035		
No-Build	267.5	315.0
Intersection Improvement	31.6	35.8
Save Our Somis	39.6	52.1

Reduced delay times are expected to relieve congestion and decrease the potential for congestion-related accidents at the intersection approaches. Therefore, both Build Alternatives would meet the project objectives. The Intersection Improvement Alternative would achieve a greater reduction in delay time and would meet Caltrans design standards. However, this alternative would result in the acquisition of 2.44 acres, compared to 1.62 acre that would be acquired for the SOS Alternative. Also, the Intersection Improvement Alternative would result in the acquisition of 2.07 acres of agricultural land, compared to 1.58 acre as a result of the SOS Alternative. The major source of controversy that has emerged from a review of public comments involves the improvements proposed under the Intersection Improvement Alternative. Community members have expressed concerns about the size of the intersection proposed under the Intersection Improvement Alternative, and its effects on the rural character of the town of Somis. Caltrans is considering the SOS Alternative, which was proposed by community members, as a result of this.

1.3.4 Alternatives Considered And Dismissed From Further Consideration

The following alternatives were considered during the project development process, but dismissed from further consideration.

Roundabout Alternative

This alternative proposed to realign Donlon Rd. and replace the existing SR-118/SR-34 intersection with a roundabout. Under this alternative, Donlon Rd. would form the north leg of

the roundabout. This alternative is no longer considered feasible because none of the alternatives under consideration for the VCPWA Project match the alignment that Caltrans proposed for the north leg of the roundabout. The proposed location of the roundabout was selected in order to avoid potential significant impacts to Coyote Canyon.

Bridge Alternative

This alternative proposed the same modifications to the SR-118/SR-34 intersection as the Intersection Improvement Alternative, with the exception of the Donlon Rd. realignment. This alternative is no longer considered feasible because Caltrans will not be undertaking the realignment of Donlon Rd.

Somis Bypass Alternative

The Somis Bypass Alternative was determined to result in substantially greater effects than the Intersection Improvement Alternative and SOS Alternative with relation to farmland acquisition, housing, visual resources, floodplains, stormwater runoff, wetlands, plant species and animal species. The sections below briefly discuss each of these effects.

Farmlands

The Somis Bypass Alternative would convert 20.69 acres of agricultural land compared to a maximum of 2.07 acres under the Build Alternatives. This alternative would also affect a total of 11 agricultural parcels, compared to a maximum of five under the Build Alternatives. Six of the parcels that would be affected by this alternative are currently used for agricultural production. The amount of land required from one parcel would potentially render it permanently non-farmable. Furthermore, this alternative would result in the removal of an agricultural tree row that is approximately one quarter-mile long on another parcel.

Relocations

The Somis Bypass Alternative would require partial acquisition of 24 parcels and the full acquisition of one parcel, compared to a maximum of 14 partial acquisitions and one full acquisition under the Build Alternatives. Furthermore, this alternative would result in the displacement of one multi-family residential unit. Both Build Alternatives would avoid residential displacement.

Visual Resources

Changes in views as a result of the the Somis Bypass Alternative would have greater visual effects than the Build Alternatives. The views to and from the road would be affected by the construction of the new road and two new signalized intersections proposed under this alternative. The new roadway would replace existing agricultural lands and require new utilities, causing a visual distraction. Vividness would drop from high to moderate visual quality as the new roadway would encroach upon the natural landscape. The encroachment of

the roadway on the visual setting would create an eyesore to viewers, resulting in a diminishment of intactness from high to moderately low visual quality. Existing development and the natural landscape would be disturbed and would not reinforce each other, causing the visual setting to look chaotic and jumbled. This would result in a diminishment in unity from high to low visual quality.

Floodplains

A portion of the new roadway proposed for the Somis Bypass Alternative would be constructed within the Fox Barranca and Coyote Canyon Zone A 100-year floodplain. Also, a bridge would be required at the location where the roadway would cross Coyote Canyon. This alternative would potentially result in a longitudinal encroachment on Fox Barranca, and would result in a transverse encroachment on Coyote Canyon, which could increase base flood levels. A longitudinal encroachment is an encroachment that is parallel to the direction of flow, and would occur if the new roadway runs along the edge of Fox Barranca, as currently proposed in the Draft Project Report. A transverse encroachment is an encroachment that is perpendicular to the direction of flow and would occur as a result of the required bridge encroachment on the floodplain. An increase in base flood levels at this location would result in overtopping of the Union Pacific Railroad (UPRR) main line. Currently, the Southern California Regional Rail Authority (SCCRA) and the UPRR operate passenger trains and freight trains over this line, respectively. Increased base flood levels would also affect neighboring properties, and could result in damages to crops. These impacts are considered to be significant.

Water Quality and Storm Water Runoff

The potential for permanent water quality and storm water runoff impacts as a result of the Somis Bypass Alternative would be incrementally greater than those associated with the Build Alternatives. The proposed increase in impervious area as a result of this alternative would be 9.4 acres compared to a maximum of 2.8 acres under the Build Alternatives. Furthermore, the potential impacts as a result due to exposure of surface soils during construction activities would also be greater, because the disturbed soil area under this alternative would be 22.91 acres compared to a maximum of 7.58 acres under the Build Alternatives.

Natural Communities

The Somis Bypass Alternative would have permanent impacts to 6.49 acres of riparian vegetation compared to 0.18 acre of riparian vegetation under either of the Build Alternatives. Furthermore, the area that would be impacted by this alternative contains riparian habitat occupied by Least Bell's Vireos, a Federal and State endangered species, and other bird species that utilize the area as an important stopping point along their migratory routes. Additionally, the fragmentation of Least Bell's Vireo habitat as a result of this alternative would result in

cumulative impacts to nesting and foraging sites. These impacts are considered to be significant.

Wetlands

The Somis Bypass Alternative would affect 0.170 acre of wetlands compared to no effect to wetlands under the Build Alternatives.

Plant Species

Potential impact to Southern Willow Scrub, a special status species, would be limited to the area south of SR-118, in the vicinity of the Somis Bypass Alternative. The Build Alternatives would have no impacts on special status plant species.

Animal Species

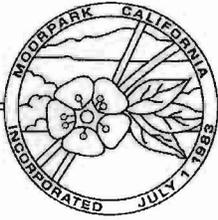
The Somis Bypass Alternative would result in potential impacts to Desert Woodrat (*Neotoma lepida intermedia*), Two-striped Garter Snake (*Thamnophis hammondi*), Arroyo Chub (*Gila orcutti*), Yellow-breasted Chat (*Icteria virens*), and Yellow Warblers (*Dendroica petechia*), all special status animal species. The Build Alternatives would avoid impacts to most of these special status species, with the exception of Desert Woodrat.

1.4 Permits and Approvals Needed

Permits and approvals that are required for the proposed project include the following:

Table 1.4-1 Permits and Approvals

Agency/Jurisdiction	Permit/Approval
Superior Court of California, County of Ventura	California Environmental Quality Act compliance determination
U.S. Army Corps of Engineers	Section 404 Permit
Federal Highway Administration	Transportation Conformity/Clean Air Act
State Water Resources Control Board	Construction General Permit/Order No. 2009-0009-DWQ; National Pollutant Discharge Elimination System Nos. CAS000002 and CAS000003
California Department of Fish and Game	1600 Series Agreement for Streambed Alteration
Los Angeles Regional Water Quality Control Board	Section 401 Water Quality Certification
Ventura County Watershed Protection District	Watercourse and Encroachment Permit



CITY OF MOORPARK

COMMUNITY DEVELOPMENT DEPARTMENT | 799 Moorpark Avenue, Moorpark, California 93021
Main City Phone Number (805) 517-6200 | Fax (805) 532-2540 | moorpark@ci.moorpark.ca.us

June __, 2012

Lead Agency:
Mr. Carlos Montez, Branch Chief
Division of Environmental Planning
California Department of Transportation
100 South Main Street
Los Angeles, CA 90012

RE: Notice of Availability of Draft Environmental Impact Report (EIR) for the State Route 118/State Route 34 Intersection Improvement Project, (Somis), Ventura County, on the application of Caltrans

Dear Mr. Montez:

Thank you for sending the Draft Environmental Impact Report (EIR) to the City of Moorpark on the proposed State Route 118/State Route 34 Intersection Improvement Project, (Somis), Ventura County. Although the City of Moorpark is neither a responsible or trustee agency for this project under CEQA, a project of this scale could impact the residents and businesses in Moorpark, based on the growth inducing potential for additional truck trips through the City. Moorpark is already significantly impacted by truck traffic on State Routes 118 and 23. We anticipated that the Draft EIR would have included more detailed analysis on growth inducing impacts on the State Route 118, which may affect Moorpark.

Chapter 1 of the Draft EIR outlines the proposed project (Attachment 2). This indicates that the SR-118 intersection at Somis Road (SR-34), currently operates at Level of Service, (LOS) F, with a 108 second delay during morning peak hours and a 188.9 second delay during afternoon peak hours. These values demonstrate that more vehicles approach the intersection at these times than it has physical capacity to accommodate. Furthermore, the Draft EIR reports that accident rates at the intersection and intersection approaches is higher than the statewide average for similar highway segments; with rear end type accidents comprising the majority of accidents at, or approaching this intersection.

Page 5 of Draft EIR (Chapter 1) shows a table that outlines average daily traffic, (ADT) as follows:

- Existing ADT - Westbound SR-118 has an ADT of 11,200 with 26.79 percent being trucks; and Eastbound SR-118 has an ADT of 17,700 with 20.63 percent being trucks.
- Projected to Year 2035 ADT - Westbound SR-118 shows an ADT of 12,400 with 26.79 percent being trucks; and Eastbound SR-118 shows an ADT of 19,600 with 20.63 percent being trucks.

From existing to projected year 2035 levels, the number of trucks would increase on Westbound SR-118 from 3,000 existing trucks to 3,322 trucks, (an increase of 322 trucks daily in 2035).

From existing to projected year 2035 levels, the number of trucks would increase on Eastbound SR-118 from 3,652 existing trucks to 4,043 trucks, (an increase of 391 trucks daily in 2035).

Furthermore, regarding truck traffic on the SR118, page 62 of the DEIR (Chapter 2), states the following: "The high volume of trucks on this segment of SR-118 and the low volume on SR-23 suggest that the trucks are using a route that does not require passing through the existing Commercial Vehicle Enforcement Facilities, (CVEF) on US-101, west of SR-23." The projections in the Draft EIR do not appear to adequately correlate with the recognition that there is an ever increasing volume of trucks on this segment of the SR-118. This should be analyzed further in the Draft EIR.

The six improvement alternatives originally proposed with the NOP, have been reduced to three alternatives, including the "no project" alternative. These two build alternatives would alleviate the congestion to varying degrees and improve safety approaching and passing through the intersection. Both build alternatives would improve LOS to the minimum acceptable level set forth in the Ventura County General Plan. However, the Draft EIR did not adequately analyze the impacts associated with potential increased truck traffic, as the improvements would increase the desirability of the SR-118 highway over other routes. The draft EIR indicates on page 48 that the proposed project would not indirectly induce substantial growth, and would not result in growth related impacts, however improved LOS at this intersection will result in increased use of this transportation corridor and this has not been adequately analyzed in the Draft EIR and additional analysis to address this should be included. The Draft EIR does not distinguish between automobiles and trucks when analyzing impacts. Also, there are no projections of ADT truck percentages for 2035. It appears that the Draft EIR carries forward the current ADT truck percentages for the 2035. With improved efficiency at this intersection, the percentage of trucks will likely increase from current levels. While the Draft EIR recognizes that trucks prefer to use the SR-118 to avoid the scale facilities on the US-101, the Draft EIR does not adequately address the potential increase of truck trips and the additional environmental impacts that this would have on the

immediate area and adjacent communities. Truck trips create greater impacts than passenger vehicles and automobiles, with more air pollution, higher levels of noise and ground vibration, and more overall traffic impacts. The Draft EIR does not address the issues that we requested to be analyzed in our letter dated November 21, 2008, responding to the NOP for this project. We request that greater analysis be included in the Draft EIR to address the increase in truck trips along the SR-118 corridor, and that analysis is provided on the impacts that this will create, and that mitigation be identified as needed.

Also, there are other traffic/circulation items that do not appear to be analyzed in the Draft EIR, which may have impacts on traffic at the project intersection of SR-118 and SR-34, as follows:

- Rice Road / Santa Clara Road improvements at US-101 and the potential for increased traffic on SR-118 have not been included in the cumulative impacts in the Draft EIR.
- Port Hueneme truck projections on Lewis Road, (SR-34) have not been included in the cumulative impacts in the Draft EIR.
- Analysis of traffic related to California State University Channel Islands has not been included in the cumulative impacts in the Draft EIR.

We request that these traffic / circulation items above be included in the cumulative impacts analysis in the Draft EIR, and that mitigation be identified as needed.

Please continue to include me as the contact person for the Moorpark Community Development Department on the notification list for environmental review and for any hearings regarding this project proposal. I can be reached at (805) 517-6236 or via email at jvacca@ci.moorpark.ca.us

Thank you for your consideration of these comments.

Sincerely,

Joseph R. Vacca, AICP
Principal Planner

C: Honorable City Council
Honorable Planning Commission
Steven Kueny, City Manager
David A. Bobardt, Community Development Director
Dave Klotzle, City Engineer / Public Works Director
File
Chron