



City of Camarillo

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November 4, 2020

Justin Bertoline, Permit Planner
Ventura County Government Center Administration Building - 3rd Floor
Resource Management Agency - Planning Division
800 S. Victoria Avenue
Ventura, CA 93009

Dear Mr. Bertoline:

We appreciate the opportunity to review and comment on the proposed Somis Ranch Farmworker Housing Project (Case No. PL19-0046). After reviewing the Draft Environmental Impact Report that is being circulated for public review and comment, we have the following comments for your consideration:

The following comments are from the City's Community Development Department:

1. The project is located immediately adjacent to the City of Camarillo City limits and Sphere of Influence. The City would like to express its position that the proposed project be carefully evaluated to assure compatibility with surrounding land uses in the City and designed to complement existing development in the surrounding area. The City of Camarillo General Plan includes a Community Design Element that was adopted by the Camarillo City Council in 2012. The policies and guidelines of the [City of Camarillo's Community Design Element](#) should be considered in evaluation of the project.
1. **Walls and Fencing:** The project description and site plan should include any proposed walls or fences proposed around the project. Any walls and fencing should be decorative and include planting in front of it, as SR-34 is identified as a scenic corridor in the City of Camarillo's General Plan Community Design Element.
2. **Site Plan:** Show the two driveways that the project will take access from Somis Road on the site plan.
3. **Noise Impacts:** Construction noise should be analyzed for potential impacts to Rancho Campana High School. Although these impacts may be temporary and therefore not constitute a significant impact, it should be evaluated and mitigation should be considered in order to reduce any temporary impacts.
4. **Soil Transport During Construction:** The Draft EIR states that the project anticipates approximately 33,600 cy of soil to be imported throughout the three phases of

development. The Draft EIR should include in the Transportation section the truck route and any potential impacts during construction due to truck traffic.

5. **Agricultural Buffer:** At the southeast corner of the 18.43-acre development area, it appears that the agricultural buffer stops as the access drive turns southwest then south. The agricultural buffer should be continued, as it appears that adjacent to the driveway the land will continue to be used for agricultural use.

The following comments are from the City's Public Works Department:

1. **Executive Summary, Construction:** Page ES-3, second paragraph states that Phase 1 construction would begin in August 2021. Construction activities for the City's North Pleasant Valley Groundwater Desalter are occurring at this time and expected to be completed by December 2021. The City's North Pleasant Valley Groundwater Desalter construction staging area occupies the southern portion of the proposed project and will continue to occupy it until December 2021, which could interfere with the proposed project's schedule.
2. **Table 1-1 Agency Comments on the NOP and EIR Responses:** Pages 1-3 and 1-4 - The table did not list item 9 on the City's June 12, 2019 letter, nor did it address the City's concerns identified in that letter. This is an updated comment to item 9:
 - a. The DEIR states, at the top of Page ES-3, that recycled water treated effluent may be used for landscape irrigation (on-site), agricultural irrigation (off-site), and/or seepage pits. The DEIR does not provide information on potential health impacts from using the recycled water in this manner. Specifically, are there any health risks or potential contamination of the City's groundwater supply by use of seepage pits and irrigation methods?
3. **Section 2.5.1.2 and Figure 2-3a** shows one of the access roads (south entrance) will be shared by City's North Pleasant Valley Groundwater Desalter. A portion of this road was designed and will be constructed for access to the Desalter. Additional improvements to the access road, including a bicycle/pedestrian pathway, will be necessary in order to accommodate the number and types of vehicles that will access the proposed project. These additional improvements will be designed and constructed as part of the project, and not by the City of Camarillo. This access road needs to be available to the City's Desalter for its operation.
4. **Section 2.5.1.2 and Figure 2-3b "Road to be built by others"** – Please clarify who are "the others".
5. **Section 2.5.4 Construction** on Page 2-17, fifth paragraph - Construction activities for the City's North Pleasant Valley Groundwater Desalter are occurring at this time and are expected to be completed by December 2021. The City's North Pleasant Valley Groundwater Desalter construction staging area occupies the southern portion of the proposed project and will continue to occupy it until December 2021, which could interfere with the proposed project's schedule.
6. **Section 4.7 Transportation** Comments regarding the **Revised Traffic Study, dated February 21, 2020**, by Associated Transportation Engineers are as follows:

- a. Page 13 – Project Trip Distribution and Assignment refers to “Fas Posas Valley.” Revise to be “Las Posas Valley.” There are at least four places to revise on this page.
 - b. Page 14 - Figure 5, the project trip distribution does not equal 100%. There are some strange symbols on this figure that need to be corrected. For example, box diagrams 1 through 6 look incorrect, there is a capital “C” and an encircled “R” at the top right corner; perhaps one of these symbols was supposed to be a trip distribution value.
 - c. Page 26 - Site Access. Paragraph states there will be two shared access connections to Somis Road. However, only the southern access connection to Somis Road will be shared between the Desalter and the project.
 - d. Page 31 – Safe Routes to School. Rancho Campana High School is an academy school and limits enrollment. Admittance into the school is by qualification and lottery. Have there been discussions with the Oxnard Union High School District regarding this project?
 - e. General Comments about the report:
 - i. This report has many strange symbols atop the original document.
 - ii. The map on the cover page appears incorrect; Richard Pool’s Civil Engineering seal has a “W”, “S” and other strange symbols covering it.
 - iii. Figures 1 through 9 all appear incorrect. They have strange symbols corrupting the report. Perhaps the software was incorrectly configured when it was printed.
 - iv. The font size and style changes, repeatedly, throughout the document.
7. **Section 4.7.2.2 Project Impacts and Mitigation Measures, Mitigation Measures, Impact T-2:** Page 4.7-10, last paragraph – “The City of Camarillo will construct a new access connection to Somis Road and improve an existing connection to Somis Road as part of the North Pleasant Valley Groundwater Desalter Facility...” “A shared access agreement allowing the project to utilize the two driveway connections has been established.” “The City of Camarillo will be required to construct the access connections to Somis road to County of Ventura and Caltrans design standards.”
- The City of Camarillo will only be constructing a portion of the southern access road connection to Somis Road. Additional improvements to the access road, including a bicycle/pedestrian pathway, will be necessary in order to accommodate the number and types of vehicles that will access the proposed project. These additional improvements will be designed and constructed as part of the project and not by the City of Camarillo.
8. **Section 4.8 Waste Treatment and Disposal:** Page 4.8-1, first paragraph – Revise “Wafstewater” to read “Wastewater.”

9. **Section 4.8.2.2 (Impact SW-1):** Page 4.8-3, first paragraph – Revise “For these reasons, the Camarillo Sanitary District on-site wastewater treatment...” to read “For these reasons, the on-site wastewater treatment...” thereby deleting the reference to the Camarillo Sanitary District on-site.
10. **Section 4.8.2.2 (Impact SW-1):** Page 4.8-3, second paragraph, last sentence – Revise “...either the county or City of Camarillo sewer system.” to read “...either the county or Camarillo Sanitary District sewer system.”
11. **Section 4.8.2.2 (Impact SW-1):** Page 4.8-3, third paragraph – Revise to include information on analysis of impact to groundwater from recycled water in seepage pits not Section 4.9, Water Resources – Surface Water Quality this section analyzes impacts to surface water not groundwater quality which could be impacted from contents of recycled water not meeting regulatory standards which is stored in seepage pits.
12. **Section 4.9 Water Resources:** analyzes impacts to surface waters. There needs to be an environmental analysis on the impact to groundwater. The irrigation of recycled water and the construction and operation of a seepage pit need to identify potential impacts to groundwater quality and ensuring that regulatory requirements (both regional and State) are addressed.
13. **Section 4.9 Water Resources:** need to add information and description of Ventura County’s LAMP regulatory program for septic system, which include seepage pits (this is a component of the project).
14. **Section 4.9.1.3:** Page 4.9-3 - Water quality impairments in the Calleguas Creek and Calleguas Creek Watershed need to add – trash, toxicity, salts (chloride, TDS); sulfate and Boron are already listed. Table 4.9-1 has a complete listing of water quality impairments.

If you have any questions about the comments contained within this letter, please contact Michelle Glueckert D’Anna, Community Relations Officer, at (805) 388-5370 or mdanna@cityofcamarillo.org. We look forward to the continued coordination between the City and County throughout the processing of this project.

Sincerely,



Greg Ramirez
City Manager

Encl: Letter from Tully Clifford, dated May 12, 2020
Letter from Dave Norman, dated June 12, 2019