

## Responses to Comments on the IS-MND

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This section includes comments received during the circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the 2800 Barry Street Affordable Housing Project (Project).

The Draft IS-MND was circulated for a 30-day public review period that began on September 4, 2020 and ended on October 5, 2020. The City of Camarillo received six comment letters on the Draft IS-MND<sup>1</sup>. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
1 Miya Edmonson, IGR/CEQA Branch Chief, Department of Transportation)	
2 Alexander Hill, Engineer II, Advanced Planning Section, Ventura County Public Works	
3 James Maxwell, Groundwater Specialist, Water Resources Division, Ventura County Public Works	
4 Victoria	
5 Jackson Piper	
6 Mitchell M. Tsai	

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

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<sup>1</sup> An additional comment letter was provided to the City on November 16, 2020, dated November 13, 2020, well after the close of the public review/comment period on the Draft IS-MND. This letter and response to comments has been incorporated as Letter 6 of this Response to Comments.

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## Letter 1

**COMMENTER:** Miya Edmonson, IGR/CEQA Branch Chief, Department of Transportation

**DATE:** October 5, 2020

### Response 1.1

The commenter agrees with the findings of the Draft IS-MND that VMT-related impacts would be less than significant, provides a reference to Caltrans' recently updated Transportation Impact Study Guide (TISG), and states that the TISG is largely based on the Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

The City acknowledges the commenter's concurrence regarding less than significant VMT impacts and the references provided. As the commenter states, the TISG is largely based on the Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which the City has utilized for determining the project's less than significant VMT related impact.

### Response 1.2

The commenter notes that the updated TISG provides a reference to the Caltrans Interim Land Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance dated July 2020, which includes simplified safety analysis approaches to reduce risks to all road users and focuses on multi-modal conflict analysis as well as access management issues. In addition, the commenter concurs that a signal is not necessary for the driveway leading to SR-34.

As discussed in Section 8, *Hazards and Hazardous Materials*, Section 17, *Transportation*, of the Draft IS-MND, and in the Transportation Study prepared by ATE Engineers, the two project driveways along Barry Street would be constructed to City of Camarillo design standards and the driveway along SR-34 would be constructed to City of Camarillo and Caltrans design standards. The project would not modify or block current emergency access routes or site ingress/egress. Access points would be designed to accommodate emergency response vehicles and the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation route.

Regarding pedestrian and bicycle safety, there are no Class I, II, or III bicycle facilities in the vicinity of the site and there are no proposed bicycle lanes in the area. (SR-34 only provides a shoulder and no designated bicycle lanes). ADA pathways are provided throughout the project site and are accessible from existing pedestrian sidewalks on the north, east, and south sides of the project site. As discussed in Section 17, *Transportation*, of the Draft IS-MND, the project would be consistent with local plans and policies regarding the circulation system and no project identified safety hazards have been identified.

### Response 1.3

The commenter recommends installation of a "No Left Turn" sign to prevent motorists from making left turns into the project site from eastbound SR-34

State Route-34 is already striped such that left turns into the project driveway are prohibited. The striping is sufficient to enforce the no left turn restriction.

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### **Response 1.4**

The commenter states that a right-of-way improvement will likely need an encroachment permit; however, a final determination will be made by the Caltrans' Office of Permits at a later date.

The commenter is correct that the project may require a permit from the Caltrans' Office of Permits for any right-of-way improvements. This is acknowledged on Page 14 of the Draft IS-MND under *Other Public Agencies Whose Approval May Be Required*, stating that Caltrans approval will be required for work within the SR-34 right-of-way.

### **Response 1.5**

The commenter states that the Lead Agency should reduce VMT and Greenhouse Gas emissions by integrating transportation and land use. Additionally, the commenter states that the Lead Agency should facilitate more non-motorized travel by considering additional bicycle parking facilities and reducing vehicle parking.

The surrounding neighborhood includes a variety of amenities such as Bob Kildee Community Park and Camarillo Skate Park, Dizdar Park, and Old Town Camarillo. As discussed in Section 8, *Greenhouse Gas Emissions*, and Section 17, *Transportation*, of the Draft IS-MND, the project site is located just north of the Camarillo transit hub, where Amtrak and Metrolink trains stop, which is also a local transit bus hub. Sidewalks along SR-34 also connect the project site directly to the transit hub. The project's direct access to existing pedestrian and bicycle networks reduces short trips by providing future residents with safe, alternative, non-vehicular modes of travel to services in the area. In addition, as discussed in Section 17, *Transportation*, of the Draft IS-MND, adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT.

### **Response 1.6**

The commenter states that a Caltrans transportation permit will be required if oversized-transport vehicles are required on State facilities. Additionally, a Construction Traffic Management Plan will need to be submitted for review if construction traffic will cause delays on State facilities. The commenter recommends limiting construction truck traffic to off-peak periods to minimize impact on State facilities.

The City acknowledges that the project may require a transportation permit for the usage of oversized-transport vehicles on State facilities. This has been added to Page 14 of the Draft IS-MND under *Other Public Agencies Whose Approval May Be Required*.

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## Letter 2

**COMMENTER:** Alexander Hill, Engineer II, Advanced Planning Section, Ventura County Public Works – Watershed Protection

**DATE:** September 23, 2020

### Response 2.1

The commenter states that Lewis Road drain has limited flood carrying capacity and no increase in peak runoff is allowed. The commenter states the most restrictive standard for mitigating stormwater runoff to Lewis Road drain shall be met.

As discussed in Section 10, *Hydrology and Water Quality*, the project would reduce impervious surfaces on the site from 95 percent to 66 percent through introduction of on-site landscaping and open space pervious areas. In compliance with the NPDES program, the Ventura County Municipal Stormwater Permit, and Ventura County Technical Guidance Manual, the project applicant would be required to implement additional design measures to capture and mitigate all stormwater on the project site, allowing for groundwater infiltration through the site, and ensure that post-development stormwater flows do not exceed pre-development levels.

In addition, a Post Construction Stormwater Management Plan was prepared, reviewed and approved by City Public Works Staff on February 20, 2020 verifying the project will meet the post-construction stormwater mitigation requirements of Board Order 2010-0108. As conditioned in the City's approval, the PCSMP has been incorporated into the project plans, and any changes to the PCSMP will be reviewed and approved by the Public Works Department prior to grading permit issuance. An encroachment permit for connection to County of Ventura stormwater facilities in Lewis Road (SR-34) from Ventura County Watershed Protection District will be also obtained prior to grading permit issuance.

### Response 2.2

The commenter states that FEMA has suspended issuance of Letters of Map Revision in Ventura County based on Fill (LOMR-F) as of August 14, 2020. The commenter states that the applicant should consult the City's floodplain manager with respect to meeting compliance standards for developing within a floodplain.

In coordination with the City Engineer and City floodplain management staff, the applicant submitted a CLOMR-F to FEMA which determined the base flood elevations for the proposed buildings on the project site. As part of the project conditions, the proposed building pads will be placed on fill to be above the base flood elevation, and the applicant will be required to submit elevation certificates pre and post construction to verify compliance with National Flood Insurance Program (NFIP) requirements.

### Response 2.3

The commenter provides advisory information to assist the project applicant and City's plan check process, including, but not limited to, referencing the updated City Master Plan of Drainage (MDP) and revising stormwater runoff calculations in accordance with the Ventura County Hydrology Manual.

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Please refer to Response 2.1 regarding post construction stormwater water runoff.



## Letter 3

**COMMENTER:** James Maxwell, Groundwater Specialist, Water Resources Division, Ventura County Public Works – Watershed Protection

**DATE:** September 24, 2020

### Response 3.1

The commenter states that a Will-Serve Letter to provide domestic water service to the project will be issued if the applicant demonstrates the project would not create additional demand on the City's water system. The commenter is requesting (1) that plans and calculations detailing water offset mitigations be provided for review; and (2) that the applicant provide the annual consumption of water for landscape irrigation.

As noted in Section 19, *Utilities and Service Systems*, of the Draft IS-MND, the applicant for a new development project must provide, to the satisfaction of the City and in accordance with the City's water demand offset program, substantial evidence of an enforceable commitment that the water demand for the project will be offset prior to the provision of a potable water will-serve letter. Preliminary water assessments were prepared, reviewed, and approved by the City's Public Works Water Division on April 22, 2020. As a condition of approval for the project and in accordance with Section 14.12.03 of the City of Camarillo Municipal Code, an updated water demand report will be required to provide detailed information on how the project will provide adequate water usage offset prior to grading permit issuance. Water offset demand strategy will need to be approved, prior to a water Will-Serve letter being issued by the City.

### Response 3.2

The commenter states that the City receives approximately 39 percent of its water supply from four City-owned groundwater wells in the Pleasant Valley Groundwater Basin. The commenter states that the project would result in 4.095 AFY of extracted groundwater to accommodate the proposed project's water demand and that the *Ventura County Initial Study Assessment Guidelines* considers additional extraction of 1.0 AFY or more of groundwater for planned developments to be potentially significant.

Please refer to Response 3.1 regarding water demand and water usage offset. As a result, required adherence to the City's Municipal Code would ensure any additional demand generated by the project would result in no net increase in the City's overall water demand and impacts to groundwater supplies would be less than significant.

### Response 3.3

The commenter states the Camarillo Wastewater Treatment Plant (CWTP) has the capacity to serve the project's wastewater generation.

This comment is consistent with Section 19, *Utilities and Service Systems*, of the Draft IS-MND, which states that the CWTP has adequate capacity to service the project.

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### **Response 3.4**

The commenter requests adding the anticipated total quantity and source of water necessary for construction and grading to the projected water demand.

Please refer to Response 3.1 regarding water demand and water usage offset. As a result, required adherence to the City's Municipal Code Section 14.12 would ensure any additional demand generated by the project would result in no net increase in the City's overall water demand.

### **Response 3.5**

The commenter requests additional mitigation plans and calculations for groundwater extraction, specifically the infiltration and percolation of surface water to the basin and verification of the basin's recharge via surface water runoff.

Please refer to Response 2.1 regarding post construction stormwater water runoff and groundwater infiltration.

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## Letter 4

**COMMENTER:** Victoria

**DATE:** September 21, 2020

### **Response 4.1**

The commenter states a concern regarding the project's potential to increase crime in the community and that the project will create problems, including traffic.

The commenter's concern regarding crime is acknowledged; however, this comment raises a social concern and does not pertain to the environmental impacts of the proposed project. As discussed in Section 17, *Transportation*, of the Draft IS-MND, the Traffic Study estimates that the project would generate 370 new daily trips, including 24 new vehicle trips during weekday morning peak hours and 30 new vehicle trips during the weekday evening peak hours and would not result in an exceedance of City of Camarillo impact thresholds at any study intersections under existing plus project or cumulative plus project conditions. No significant impacts to the local circulation network have been identified.

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## Letter 5

**COMMENTER:** Jackson Piper

**DATE:** October 5, 2020

### **Response 5.1**

The commenter states support for the project.

The commenter's support for the project is noted.

## Letter 6

**COMMENTER:** Mitchell M. Tsai

**DATE:** November 13, 2020

### Response 6.1

The commenter, on behalf of “Southwest Regional Council of Carpenters” accurately restates the project description for the project and states their client would be directly affected by the project’s environmental impacts. The commenter states their client reserves the right to provide comments on the Draft IS-MND (in addition to during public hearings) and requests forwarding of any and all notices for the project under CEQA.

As requested, the City will forward CEQA public noticing to the commenter. The commenter correctly states his client’s role in the CEQA process. Individual responses regarding the commenters concerns pertaining to the project’s potential environmental impacts and the adequacy of the Draft IS-MND are addressed below.

### Response 6.2

The commenter states the City should consider proposing that the Applicant provide additional community benefits such as requiring local hire and paying prevailing wages to benefit the City.

A letter response from the Area Housing Authority of the County of Ventura (dated 11/19/20) is included at the end of this Response to Comments document. As the lead developer, the Area Housing Authority of the County of Ventura acknowledges that the project is a “public work” as defined by California Labor Code Section 1720 and accordingly will require that prevailing wages shall be paid on the project, that the project, general contractor(s) and subcontractors are appropriately registered as required in the Labor Code, that certified payrolls are reported in the matter prescribed by the Department of Industrial relations and that the applicable Labor Code provisions related to apprentices are followed.

### Response 6.3

The commenter states the City should require the project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the project’s environmental impacts and to advance progress towards the State’s environmental goals.

As discussed in the *Project Description*, of the Draft IS-MND, the project would be designed to achieve a Greenpoint rating, meet California Tax Credit Allocation Committee’s (TCAC) requirements for green building and sustainability features, would exceed Title 24 energy requirements by 12 percent, and would include energy-efficient appliances and lighting, solar panel carports, and water-efficient appliances and fixtures. As discussed in Section 6, *Energy*, of the Draft IS-MND, the project would be subject to and would comply with all California’s CAL Green standards (California Code of Regulations, Title 24, Part 11) requiring implementation of energy efficient light fixtures and building materials into the design of new construction projects. No potentially significant environmental impacts related to energy use have been identified requiring the implementation of mitigation measures. The project would be in conformance with the latest version of California’s Green

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Building Standards Code and the Building Energy Efficiency Standards, which ensures that the project continues progress towards the State's environmental goals.

#### **Response 6.4**

The commenter states that the project does not meet CEQA requirements, provides background information concerning CEQA and the EIR process, and states that the City should prepare an EIR since the project will have a significant effect on the environment.

The information provided regarding CEQA background and the EIR process is correct. As discussed in the individual responses to the commenter's letter, the City finds that the project will not have a significant impact on the environment and preparation of an EIR is not warranted. Please refer to Responses 6.5 through 6.20.

#### **Response 6.5**

The commenter states that CEQA requires revision and recirculation of an Environmental Impact Report when substantial changes or new information comes to light and provides citations to the CEQA Guidelines and court cases. The commenter states that for the reasons cited in his letter, significant new information has been raised relating to the project that requires revision and recirculation of the IS-MND.

Individual responses addressing the commenter's specific concerns are addressed in Responses 6.6 through 6.20. As noted in those responses, the City has determined that no significant new information has been raised that identifies a significant environmental impact or that requires revision and recirculation of the IS-MND.

#### **Response 6.6**

The commenter states the City must adopt a Mandatory Finding of Significance that the project may cause a substantial adverse effect on human beings and mitigate COVID-19 Impacts. The commenter requests the City to require safe on-site practices and certification for workers on the site, as well as recommends and provides a list of safe construction site work practices that the City should require while construction activities are being conducted.

The City acknowledges the list of safe construction site work practices provided by the commenter. While the City acknowledges that COVID-19 is a serious public health issue, public health effects related to infectious diseases such as COVID-19 are not specifically included on the environmental checklist in Appendix G of the CEQA Guidelines and public health effects are typically considered under CEQA only insofar as they relate to environmental impacts that are the focus of CEQA (e.g. air pollutant emissions and noise) rather than infectious diseases. Moreover, the COVID-19 pandemic is an existing/baseline condition and not a result of the proposed construction activities. Finally, as discussed in the *Project Description*, of the Draft IS-MND, construction of the project is anticipated to occur from March 2022 to September 2023. It is not known what conditions regarding COVID-19 will be during this time period, but construction contractors will be subject to any state or local restrictions/guidelines in place at that time (including but not limited to California Occupational Safety and Health Act regulations<sup>2</sup>).

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<sup>2</sup> For example, see CA OSHA Safety and Health Guidance - COVID-19 Infection Prevention in Construction, accessible at: <https://www.dir.ca.gov/dosh/coronavirus/COVID-19-Infection-Prevention-in-Construction.pdf>, which states that there is an existing

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## Response 6.7

The commenter provides background information regarding the deferment of mitigation measures during the environmental review process, provides examples, and cites court cases to support the comment. The commenter states that the Draft IS-MND defers mitigation measure BIO-1 to reduce potentially significant impacts to nesting birds on the project site. The commenter states that BIO-1 calls for a qualified biologist to perform a nesting bird survey and institute buffer zones and monitoring should nesting birds be found, but no specific measures or performance standards are specified in the Draft IS-MND. The commenter states that the development of a plan is deferred until such time as a biologist is retained to perform a survey, or design a buffer zone, without any performance standards by which the adequacy of the proposed mitigation could be evaluated should specific details require formulation at a later date.

As discussed in the *Project Description*, of the Draft IS-MND, construction of the project is anticipated to occur from March 2022 to September 2023; therefore, preparation of a pre-construction/initial site clearing nesting bird survey at this time would not serve the purpose of the presence based survey since conditions could change between now and March 2022. As indicated in Mitigation Measure BIO-1, if the start of construction and initial site clearings is proposed to occur during the nesting season, the Applicant will be required to complete and submit a nesting bird survey to the City. This will occur prior to initial site clearing and issuance of a grading permit. If nesting birds are not observed, no further action is necessary. If nesting birds are observed, the Applicant will be required to adhere to the requirements in the mitigation measure, including, but not limited to: retaining a qualified biologist, establishment of an adequate buffer per the qualified biologist's recommendations, and on-site monitoring, to ensure adverse effects to nesting birds will not occur. The performance measure is listed in BIO-1, stating that nests shall be monitored at a minimum of once per week by the qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. These actions are enforced and conditioned, as included in the Mitigation Monitoring and Reporting Plan (MMRP) for the project.

## Response 6.8

The commenter states that the project has the potential to generate excessive noise levels during the construction phase, which could affect nearby sensitive receptors and that the noise estimates in the IS-MND stand completely unsubstantiated in the noise analysis while giving itself the maximum possible distance from the sensitive receptors.

Per Section 10.34.120(E) of the City's Municipal Code, construction activities are exempt from the interior and exterior requirements, provided that exterior construction or repair work does not generate noise levels exceeding the Noise Ordinance exterior noise standards at residential properties between the hours of 7:00 PM of one day and 7:00 AM of the next day or at any time on Sunday, or at any time on any public holiday. As discussed in the *Project Description*, of the Draft IS-MND, construction of the project would occur from 7:00 AM to 4:00 PM., Monday through Saturday, and not during any public holidays (i.e., New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day, and Christmas Day). Nevertheless, a construction noise analysis was prepared in the Draft IS-MND for informational purposes, which assessed and modeled anticipated construction noise. As discussed in Section 13, *Noise*, of the Draft IS-MND, project construction would require the use of heavy equipment for site preparation, grading,

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regulatory requirement for all CA employers to implement an Injury and Illness Prevention Program to protect employees from all worksite hazards, including infectious diseases. See also, United States Department of Labor – Occupational Safety and Health Administration. COVID-19. Accessible at: <https://www.osha.gov/SLTC/covid-19/standards.html>.

building construction, and paving activities. Over the course of a typical construction day, construction equipment could be as close as 15 feet from the nearest sensitive receiver (residences to the west) for limited periods when grading and paving the parking lot at the western portion of the site. However, because most project construction and heavy equipment use would occur in the central portion of the site (based on the proposed building configuration on the site), it is assumed that over the course of a typical construction day the construction equipment would operate at an average distance of 150 feet from the project boundary. The center of the site is approximately 150 feet from the western project site boundary and approximately 150 feet from the northern project site boundary. Although construction activity is exempt from the City's noise standards, the FTA Transit Noise and Vibration Impact Assessment (2018) provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For residential uses, the daytime noise threshold is 80 dBA  $L_{eq}$  for an 8-hour period. This threshold is based on an 8-hour average (i.e., over the course of a typical construction day). Over the course of a day, construction equipment would operate on average 150 feet from the nearest sensitive receptors, as measured from the center of the construction site or activity.

The closest distance at which construction equipment would approach sensitive receptors would not be the appropriate distance to assess noise impacts as equipment would not operate at that distance for an entire construction day and would mainly operate in the central portion of the site. Therefore, a distance of 150 feet was used to assess potential impacts to sensitive receivers. Construction noise would vary depending on the mix of equipment and the location of the activity on the project site. Typical heavy construction equipment would include bulldozers, excavators, dump trucks, front-end loaders, graders, and stationary equipment, such as compressors and generators. As discussed in the Draft IS-MND, for assessment purposes and to be conservative, the loudest hour was utilized for assessment, based on a loader, a dozer, a grader, and a stationary engine operating simultaneously. This is typical of the loudest construction phase, grading. Using the FHWA Roadway Construction Noise Model (RCNM) to estimate noise associated with construction equipment, maximum hourly noise levels are calculated to be about 75 dBA  $L_{eq}$  at 150 feet, as measured from the center of the construction site or activity. This is below the FTA residential daytime threshold of 80 dBA  $L_{eq}$  for an 8-hour period. Assuming noise increases at a rate of 6 dBA with a doubling of distance, at an average distance of 85 feet over the course of a construction day noise levels from construction would result in a noise level of 79.9 dBA  $L_{eq}$  for an 8-hour period, which would still not exceed 80 dBA  $L_{eq}$  (8 hour). RCNM Calculations are included in Appendix I of the Draft IS-MND.

It should also be noted that in footnote 6 the commenter references a noise threshold in the City of Santa Ana General Plan, which is not the jurisdiction in which the project is located. Therefore, this threshold does not apply. In footnote 4, the commenter references a City of Camarillo General Plan Noise Element 70 dBA compatibility standard for exterior noise at residential sites. The threshold is actually 70 dBA Ldn or 70 dBA CNEL, which accounts for noise over a 24-hour period. As a General Plan is a planning document, this is a land use/noise compatibility table used to determine noise compatibility for new land uses from transportation source. As stated on Page 12-8 of the Noise Element, "noise ordinances do not apply to motor vehicle noise on public streets or other transportation-related noise sources that are preempted by the State or Federal government. Local protections from transportation-related noise are therefore accomplished through the land use planning process, of which this Noise Element is part." This standard is not a CEQA threshold adopted by the City for the use in construction noise analyses and, therefore, does not apply.

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## Response 6.9

The commenter states the IS-MND fails to support its findings with substantial evidence. The commenter states that when new information is brought to light showing that an impact previously discussed in the EIR or IS-MND, but found to be insignificant with or without mitigation in the EIR or IS-MND's analysis, has the potential for a significant environmental impact supported by substantial evidence, the EIR or IS-MND must consider and resolve the conflict in the evidence.

Please refer to Response 6.5. Also, as noted through the responses to Letter 6, the City has determined that none of the issues raised by the commenter identify any potentially significant environmental effects.

## Response 6.10

The commenter states that substantial evidence was not provided for determining that the health risk associated with diesel particulate matter (DPM) emissions during construction and operation would be less than significant. The commenter contends that omission of a quantified Health Risk Assessment (HRA) for construction and operation is inconsistent with the most recent guidance published by the Office of Environmental Health Hazard Assessment (OEHHA). The commenter asserts that the Draft IS-MND errs by not comparing the estimated health risk to the South Coast Air Quality Management District's (SCAQMD) excess cancer risk threshold. The commenter also states that a cumulative air quality impact analysis was not conducted.

Diesel particulate matter is a toxic air contaminant (TAC). In reference to evaluating TAC emission impacts under CEQA, the Ventura County Air Pollution Control District's (VCAPCD) Ventura County Air Quality Assessment Guidelines (Guidelines; 2003) state, "When considering potential toxic air contaminant [TAC] impacts, lead agencies should consider both of the following situations: 1) a proposed new or modified facility that may emit TACs near existing land uses; and, 2) a new land use proposed near an existing facility that emits TACs." The examples of TAC emission sources listed in Table D-1 of the Guidelines include uses such as aerospace manufacturing, autobody shops, chrome plating facilities, gasoline stations, hospitals, natural gas plants, petroleum refineries, and wastewater treatment facilities. The Guidelines do not recommend conducting a quantitative HRA for construction activities to evaluate the effects of TAC emissions (VCAPCD 2003, Section 6.5). The rationale for not requiring a health risk assessment for construction activities is the limited duration of exposure in comparison to the typical exposure durations used for HRAs. As stated on page 30 of Section 4.3, *Air Quality*, of the Draft IS-MND, according to OEHHA methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk," which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime (i.e., 840 months) will contract cancer based on the use of standard risk assessment methodology. Given the construction schedule of approximately 19 months, the project would not result in a long-term (i.e., 70-year), continuous source of TAC emissions. No residual emissions or corresponding individual cancer risk from on-site DPM emissions are anticipated after construction is completed. Because of the short-term nature of the exposure period related to construction (19 out of 840 months [about 2 percent] of a 70-year lifetime), health risks were determined to be less than significant and further evaluation of construction TAC emissions in the Draft IS-MND was determined to not be warranted.

The commenter correctly notes that OEHHA adopted a new version of the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual) in March of 2015. The Guidance Manual was developed by OEHHA, in conjunction with the California Air

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Resources Board, for use in implementing the Air Toxics “Hot Spots” Program (Health and Safety Code Section 44360 et. seq.). The Air Toxics “Hot Spots” Program requires the operators of stationary sources to report the types and quantities of certain substances routinely released into the air, but does not apply to temporary construction activities. The goals of the Air Toxics “Hot Spots” Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The new Guidance Manual provides recommendations related to cancer risk evaluation of certain short-term projects. As discussed in Section 8.2.10 of the Guidance Manual, “The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.” The Guidance Manual does not specifically define what time period constitutes a “short-term project;” however, it is reasonable to assume that any projects that are less than nine years in duration are short-term projects because nine years is typically the minimum exposure duration recommended for conducting an HRA (OEHHA 2015). Short-term projects that would require a permitting decision by VCAPCD typically would be limited to site remediation (e.g., stationary soil vapor extractors), which is not required for the proposed project. General construction activities are not short-term projects that would require a permitting decision by VCAPCD and are therefore not included in this recommendation. The new Guidance Manual does not provide specific recommendations for evaluation of short-term use of off-road mobile sources (e.g., heavy-duty diesel construction equipment). The conclusion of the Draft IS-MND that project construction would not expose sensitive receptors to substantial TAC emissions remains valid.

With regard to project operation, as stated on page 29 in Section 3, *Air Quality*, of the Draft IS-MND, a HRA was prepared for the project to evaluate the possible health effects associated with existing TAC emissions sources (specifically mobile source emissions of DPM generated by existing and project-related traffic) on future project residents. The HRA was included as Appendix C to the Draft IS-MND. As stated on page 30 of the Draft IS-MND, the HRA determined that the maximum exposed individual receptor (MEIR) on the project site would be exposed to a high end (95-percentile), 30-year excess cancer risk of approximately 8.6 in one million, which does not exceed the VCAPCD-recommended health risk criteria of 10 excess cases of cancer in one million individuals. Given that the nearest sensitive receptors to the project site are located a similar distance from State Route 34 and U.S. Highway 101 (the main locations of high-volume vehicular traffic emitting DPM), it is reasonable to assume that these off-site receptors would be exposed to similar health risks as future on-site residents, which would be less than significant. Furthermore, the commenter is incorrect in stating that the project would “generate thousands of daily vehicle trips, not including pass-by trips or internal capture.” As shown in Table 3 of Appendix J, the project is expected to generate 370 daily trips with no reductions for pass-by trips or internal capture assumed. For comparison, the project’s expected daily trip generation represents approximately two percent of existing daily traffic volumes on State Route 34 adjacent to the project site (370 daily project-related trips divided by 18,200 existing daily trips on State Route 34; see Appendix C) and approximately 0.3 percent of existing daily traffic volumes on the segment of U.S. Highway 101 south of the project site (370 daily project-related trips divided by 136,000 to 144,000 existing daily trips on U.S. Highway 101; see Appendix C). DPM emissions from mobile sources are only associated with the combustion of diesel fuel. Given that the project consists of multi-family residential land uses, the majority of vehicle trips to and from the project site would be made by future residents’ gasoline-fueled vehicles, which do not emit DPM. A small fraction of vehicle trips would be associated with diesel-fueled vehicles such as garbage trucks, school buses, and public transit; however, these trips would likely not be net new trips given that the project site is adjacent to an existing residential

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neighborhood in an urbanized area that is already served by garbage trucks, school buses, and public transit. Furthermore, of the DPM emissions associated with diesel-fueled vehicles serving the project site and future residents, only a minor fraction would be emitted at or near the project site and the nearest off-site sensitive receptors while the remainder would be dispersed along local and regional roadways used to access the project site. Therefore, there is no evidence that project operation would result in a significant health risk impact to nearby sensitive receptors due to DPM emissions, and the conclusion of the Draft IS-MND that project operation would not expose sensitive receptors to substantial TAC emissions remains valid. No additional analysis is warranted.

The commenter states that the Draft IS-MND should compare the estimated health risk to the SCAQMD's excess cancer risk threshold. The project site is not located in the jurisdiction of the SCAQMD but rather in the jurisdiction of the VCAPCD. Therefore, the thresholds set forth by the SCAQMD do not apply to the proposed project unless the VCAPCD recommends their use or the lead agency elects to use their thresholds. For the evaluation of TAC impacts, the VCAPCD Guidelines (2003) do not include a recommendation to use SCAQMD thresholds, and the City of Camarillo, acting as lead agency, relies on VCAPCD thresholds to evaluate TAC impacts given that the City is within VCAPCD jurisdiction and the VCAPCD provides recommendations for evaluating TAC impacts in its guidelines (2003).

With respect to cumulative impacts, project-level significance thresholds established by local air districts set the level at which a project would cause or have a cumulatively considerable contribution to an exceedance of a federal or state ambient air quality standard. For example, the VCAPCD has set its significance thresholds for ozone precursors of reactive organic compounds (ROC) and nitrogen oxides (NO<sub>x</sub>) such that an exceedance of the thresholds would "individually and cumulatively jeopardize attainment of the federal one-hour ozone standard and thus have a significant adverse impact on air quality in Ventura County" (VCAPCD 2003). If project-related air pollutant emissions exceed the VCAPCD thresholds for ROC and NO<sub>x</sub>, the project would have a considerable contribution to the existing cumulative ozone impact. As shown in Table 4 and stated on 28 of Section 3, *Air Quality*, of the Draft IS-MND, the project's emissions would not exceed the VCAPCD-recommended significance thresholds of 25 pounds per day for ROC and NO<sub>x</sub>. Because the VCAPCD thresholds are set at the level at which a project would have a cumulatively considerable contribution to the existing cumulative air quality impact, the project would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

## Response 6.11

The commenter states the Draft IS-MND fails to support its findings on greenhouse gas (GHG) emissions with substantial evidence. The commenter states that the quantitative GHG analysis in the Draft IS-MND underestimates the project's emissions. The commenter contends that the vehicle miles traveled (VMT) estimate used to calculate the project's GHG emissions is an underestimate of the project's VMT. The commenter also states an opinion that there is no evidence that there would be a reduction in VMT.

The air pollutant and GHG emissions generated by VMT during project operation are based on the estimate provided by the California Emissions Estimator Model (CalEEMod version 2016.3.2), included as Appendix B of the Draft IS-MND. CalEEMod is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD and other California air districts and is used by jurisdictions throughout the state to quantify criteria pollutant and GHG emissions. The data underlying the VMT calculations in CalEEMod, such as average trip length values

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for residential projects in an urban setting, are based on the statewide average, which CAPCOA and SCAQMD determined is appropriate to apply in Ventura County (CAPCOA 2017).

As shown in Table 4.2 of Appendix B of the Draft IS-MND, the project would result in an “unmitigated” estimate of 1,058,888 annual VMT, and a “mitigated” estimate of 654,622 annual VMT. The “mitigated” estimate accounts for site-specific factors and project design features. “Mitigation” included in CalEEMod is a term of art for the modeling input and is not equivalent to mitigation measures that may apply to the CEQA impact analysis. Because these are project design features/location-based factors rather than mitigation measures in the sense used by CEQA, these measures do not require details on implementation, monitoring, or enforcement. They will be included on the project plans, which will be reviewed and approved by the City of Camarillo for consistency with the Draft IS-MND during final plan review. Substantial evidence for the applicability of each of these measures (Increase Density, Increase Transit Accessibility, and Integrate Below Market Rate Housing applied) to the proposed project is discussed in detail below:

- **Increase Density.** The project includes a density of 27.4 units per acre. Increased densities affect the distance people travel because higher densities in urban areas normally include greater access to alternate modes of transportation and proximity to mixed uses<sup>3</sup>. Therefore, this measure is applicable to the project site location.
- **Increase Transit Accessibility.** The project site is located approximately 0.1 mile from a major transit stop, the Camarillo transit hub, which is an existing rail transit station and a local transit bus hub. The measure applies to the project because the nearest transit stop and the project site vicinity meet the criteria specified in the CAPCOA Guidance Document (CAPCOA 2010). This measure serves to reduce VMT because proximity to transit facilitates the use of transit by future residents and guests. Therefore, its inclusion in the model is substantiated.
- **Below Market Rate Housing.** Below Market Rate housing provides greater opportunity for lower income families to live closer to jobs centers and achieve jobs/housing match near transit. As stated in the CAPCOA Guidance Document, “This strategy potentially encourages building a greater percentage of smaller units that allow a greater number of families to be accommodated on infill and transit-oriented development sites within a given building footprint and height limit.” In addition, “lower income families tend to have lower levels of auto ownership” (CAPCOA 2010). The project consists of development of 68 affordable housing units intended for families and workforce household earning less than 80 percent of the Area Median Income (AMI). Therefore, the inclusion of this measure in the model is substantiated.

Furthermore, the average daily VMT of approximately 10 miles per resident (654,622 annual VMT divided by 365 days divided by 183 residents) is an *average*, meaning that some residents may drive longer distances whereas others may not drive at all and use only public transit. In addition, the purpose of the project is to provide affordable housing for residents to live in close proximity to places of employment in Camarillo, not in other cities in the region.

The commenter’s use of 469,332 VMT in his letter revealed a calculation/typographical error in Section 5, *Energy*, of the Draft IS-MND, where energy consumption was calculated based on 467,332 vehicle miles traveled, and not 654,622. This revision does not change the Less Than Significant significance determination made in the Draft IS-MND. Revisions to Table 8 and associated text on Page 41 of the Draft IS-MND in the Final IS-MND has been made, as shown below.

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<sup>3</sup> California Air Pollution Control Officers Association (CAPCOA). 2010. *Quantifying Greenhouse Gas Mitigation Measures*. August 2010.

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According to the CalEEMod calculations, the project would result in 654,622 annual vehicle miles traveled (VMT) (Appendix B). As shown in Table 1, the project would result in an annual net change in transportation-related energy consumption of ~~126,078~~ 34,674 gallons of fuel or ~~2,925~~ 3,157 million British thermal units (MMBtu).

**Table 1 Estimated Project Annual Transportation Energy Consumption**

Vehicle Type <sup>1</sup>	Percent of Vehicle Trips <sup>2</sup>	Annual Vehicle Miles Traveled <sup>3</sup>	Average Fuel Economy (miles/gallon) <sup>4</sup>	Total Annual Fuel Consumption (gallons)	Total Fuel Consumption (MMBtu) <sup>6</sup>
Passenger Cars	59.75	<del>280,406</del> <u>391,108</u>	24.0	<del>11,683</del> <u>16,296</u>	<del>1,459</del> <u>1,484</u>
Light/Medium Trucks	33.34	<del>156,493</del> <u>218,276</u>	17.4	<del>8,992</del> <u>12,545</u>	<del>1,122</del> <u>1,143</u>
Heavy Trucks/Other	6.53	<del>30,643</del> <u>42,740</u>	7.4	<del>4,141</del> <u>5,776</u>	<del>341</del> <u>526</u>
Motorcycles	0.38	<del>1,791</del> <u>2,498</u>	43.9 <sup>5</sup>	<del>41</del> <u>57</u>	<del>3</del> <u>4</u>
<b>Total</b>	<b>100.0</b>	<del><b>469,332</b></del> <b><u>654,622</u></b>	–	<del><b>126,078</b></del> <b><u>34,674</u></b>	<del><b>2,925</b></del> <b><u>3,157</u></b>

Notes: Totals may not add up due to rounding. Energy consumption calculations are included in Appendix B.

<sup>1</sup> Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in DOT fuel consumption data, except for motorcycles. Therefore, it was assumed that passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/other correspond to the single unit, 2-axle 6-tire or more class.

<sup>2</sup> Percent of vehicle trips from CalEEMod Table 4.4 “Fleet Mix” in CalEEMod results (see Appendix B).

<sup>3</sup> Mitigated annual VMT found in Table 4.2 “Trip Summary Information” in CalEEMod results (see Appendix B).

<sup>4</sup> Average Fuel Economies: U.S. Department of Energy, 2018.

<sup>5</sup> U.S. Department of Transportation 2013

<sup>6</sup> One gallon of gasoline is equivalent to approximately 109,786 Btu, while one gallon of diesel is equivalent to approximately 127,464 Btu (CARB 2015).

Lastly, the Draft IS-MND does not assert that the project would result in a net reduction in VMT in comparison to baseline conditions. The Draft IS-MND evaluates project impacts related to VMT based on whether the project would create a *substantial increase* in VMT or conflict with CEQA Guidelines section 15064.3(b) (see Response 1.1 and Section 17, *Transportation*, of the Draft IS-MND), as stated on page 84 in Section 17, *Transportation*. As determined therein, the project would not create a substantial increase in VMT or conflict with CEQA Guidelines section 15064.3(b); therefore, impacts would be less than significant.

## Response 6.12

The commenter provides background regarding the State Planning and Zoning Law and that an EIR must identify, fully analyze and mitigate any inconsistencies between a proposed project and the general, specific, regional, and other plans that apply to the project. The commenter reiterates that the project has the potential to generate excessive noise levels during the construction phase, which could affect nearby sensitive receptors at residential sites.

The commenter accurately provides background regarding the State Planning Law. As discussed in Section 11, *Land Use and Planning*, the project would not conflict with applicable land use plans,

policies and regulations adopted to avoid environmental effects. Please refer to Response 6.8 regarding noise.

### **Response 6.13**

The commenter states that CEQA requires analysis of inconsistencies between the project and the relevant RTP/SCS plan, summarizes adoption of the RTP/SCS and its goals of reducing greenhouse gas emissions, states that the RTP/SCS Program EIR identifies project-level environmental mitigation measures that directly and/or indirectly relate to a project's GHG impacts and contribution to the region's GHG emissions, and states the IS-MND does not demonstrate consistency with many of the RTP/SCS project level goals, including: land use and transportation; GHG emissions; hydrology and water quality; transportation, traffic and safety, and utilities and service systems.

Project-level mitigation measures identified by SCAG are measures that have been used for projects in the SCAG region and that are capable of avoiding or reducing potential impacts on the resource area and achieving compliance with applicable laws, regulations, and standards that are within the jurisdiction and authority of the public agencies responsible for regulating and enforcing compliance with performance standards for the resource area. The City of Camarillo, as the Lead Agency with approval over the project, has determined the project would not result in significant impacts in the resources areas listed by the commenter; therefore, application of project-level mitigation measures identified by SCAG to reduce significant impacts is not warranted. Individual responses regarding consistency with the RTP/SCS ((land use and transportation; GHG emissions; hydrology and water quality; transportation, traffic and safety, and utilities and service systems are provided in responses 6.14 through 6.18.

### **Response 6.14**

The commenter states that the Draft IS-MND does not demonstrate that the project is consistent with land use and transportation goals of the RTP/SCS.

As discussed in Section 8, *Greenhouse Gas Emissions*, and Section 11, *Land Use and Planning*, of the Draft IS-MND, the project site is an urban infill site located in an area developed with existing residential uses, just north of the Camarillo transit hub, where Amtrak and Metrolink trains stop, which is also a local transit bus hub. Sidewalks and bike lanes along Lewis Road (SR 34) also connect the project site directly to the transit hub. Therefore, the project would be consistent with the goals of the RTP/SCS to focus employment growth around transit, livable corridors, and safe active transportation networks. The project site's access to existing pedestrian and bicycle networks also supports the goal of reducing short trips by providing future residents with safe, alternative, non-vehicular modes of travel to services in the area. This is consistent with Goal 2 of the 2016 RTP/SCS (Maximizing mobility and accessibility for all people and goods in the region) and Goal 8 of the RTP/SCS (Encourage land use and growth patterns that facilitate transit and active transportation).

### **Response 6.15**

The commenter states that the Draft IS-MND does not demonstrate that the project is consistent with greenhouse gas emission reduction goals of the RTP/SCS.

The "goals" listed by the commenter are strategies generally adapted from the mitigation measures included in Mitigation Measure GHG-3(b) of the 2016 RTP/SCS. As discussed in MM-GHG-3(b), these measures are to be considered where the Lead Agency has identified that a project has the potential

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to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, and that the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts. As discussed in the *Project Description*, of the Draft IS-MND, the project would be designed to achieve a Greenpoint rating, meet California Tax Credit Allocation Committee's (TCAC) requirements for green building and sustainability features, would exceed Title 24 energy requirements by 12 percent, and would include energy-efficient appliances and lighting, solar panel carports, and water-efficient appliances and fixtures. This is consistent with Goal 7 of the 2016 RTP/SCS (Actively encourage and create incentives for energy efficiency, where possible). As discussed in, Section 8, *Greenhouse Gas Emissions*, of the Draft IS-MND, the project would involve infill development consisting of affordable housing near existing transportation networks and would not exceed per capita greenhouse emissions targets nor would it conflict with achievement of the State's GHG reduction targets. This is consistent with Goal 6 of the 2016 RTP/SCS (Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)). Since the project would not conflict with an applicable plan, policy, or regulation adopted for reducing greenhouse gas emissions and no potential impacts have been identified, impacts would be less than significant and application of the individual measures listed in MM-GHG-3(b) are not required.

### Response 6.16

The commenter states that the Draft IS-MND does not demonstrate that the project is consistent with hydrology and water quality goals of the RTP/SCS.

The "goals" listed by the commenter are strategies generally adapted from the mitigation measures included in Mitigation Measure HYD-1(b), HYD-2(b), and MM-HYD-8(b) of the 2016 RTP/SCS. As discussed in these mitigation measures, these measures are to be considered where the Lead Agency has determined that a project has the potential for significant effects. As discussed in Section 8, *Hydrology and Water Quality*, of the Draft IS-MND, on-site construction activities would be required to comply with the California State Construction General Permit requiring the creation and implementation of a Storm Water Pollution Prevention Plan, which would include best management practices to prevent stormwater pollution during construction (i.e., pollutant source control, site design to reduce run off, monitoring for spills and leaks, implementing straw wattles, silt fencing, infiltration techniques, etc.). The project would comply with the Ventura County Municipal Stormwater Permit and Ventura County Technical Guidance Manual and would be required to incorporate additional best management practices (stormwater retention, bio-filtration, etc.) identified in the approved PCSMP No. SW0042 to reduce operational water quality impacts. Compliance with applicable federal, state, and local regulations, and permit provisions would ensure that the project would not violate any water quality standards or water discharge requirements and project impacts would be less than significant. As discussed in Response 2.1, in compliance with the NPDES program, the Ventura County Municipal Stormwater Permit, and Ventura County Technical Guidance Manual, the project applicant would be required to implement additional design measures to capture and mitigate all stormwater on the project site, allowing for groundwater infiltration through the site, and ensure that post-development stormwater flows do not exceed pre-development levels. See Response 2.2 regarding National Flood Insurance Program (NFIP) requirements. Since the project would not violate water quality standards or result in significant hydrology impacts through regulatory compliance impacts would be less than significant. It is noted that some of the measures listed in Mitigation Measure MM-HYD-1(b), HYD-2(b), and MM-HYD-8(b)), are regulatory compliance consistent with the City of Camarillo Municipal Code (i.e., preparation of a SWCP, SWPPP, stormwater capture).

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### **Response 6.17**

The commenter states that the Draft IS-MND does not demonstrate that the project is consistent with transportation, traffic, and safety goals of the RTP/SCS.

The “goals” listed by the commenter are strategies generally adapted from the mitigation measures included in Mitigation Measure TRA-1(b), TRA-2(b), and TRA-4(b) of the 2016 RTP/SCS. As discussed in these mitigation measures, these measures are to be considered where the Lead Agency has identified that a project has the potential for significant effects. See Response 6.14, regarding the project’s proximity to multi-modal transportation facilities. As discussed in Section 17, *Transportation and Traffic*, of the Draft IS-MND, the project would be consistent with local plans and policies regarding the circulation system, would not create a substantial increase in VMT or conflict or be inconsistent with CEQA Guidelines section 15064.3(b), would not create hazardous or dangerous conditions for vehicles entering and exiting the site or result in inadequate emergency access. As such, the project is consistent with Goal 2 of the 2016 RTP/SCS (Maximize mobility and accessibility for all people and goods in the region), Goal 3 (Ensure travel safety and reliability for all people and goods in the region), Goal 4 (Preserve and ensure a sustainable regional transportation system), Goal 6 (Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)). Since the project would not result in significant transportation, traffic, or safety impacts, impacts would be less than significant. It is noted that regulatory compliance through the City of Camarillo Municipal Code and project design incorporates some of the strategies listed in Mitigation Measure MM TRA-1(b), TRA-2(b), and TRA-4(b)) (see Response 1.1 through Response 1.6)

### **Response 6.18**

The commenter states that the Draft IS-MND does not demonstrate that the project is consistent with utilities and service system goals of the RTP/SCS.

The “goals” listed by the commenter are strategies generally adapted from the solid waste mitigation measures included in Mitigation Measure USS-6(b) of the 2016 RTP/SCS. As discussed in this mitigation measure, these measures are to be considered where the Lead Agency has identified that a project has the potential for significant effects. As discussed in Response 6.3, the project would be designed to achieve a Greenpoint rating and meet California Tax Credit Allocation Committee's (TCAC) requirements for green building and sustainability features. As such, the project is consistent with Goal 7 of the 2016 RTP/SCS (Actively encourage and create incentives for energy efficiency, where possible). As discussed in Section 19, *Utilities and Service Systems*, of the Draft IS-MND, the project would not result in significant utilities and service system impacts; therefore, application of measures listed in MM-USS6(b) is not required.

### **Response 6.19**

The commenter states that the land use analysis in the Draft IS-MND includes some compliance measures to satisfy the Heritage Zone requirements, but does not address and ensure compliance with other elements of the Community Design Element.

As discussed in Section 1, *Aesthetics*, and Section 11, *Land Use and Planning*, of the Draft IS-MND, the project would comply with the design requirements of the Heritage Zone, would be compatible with residential uses to the north and west, and would be visually compatible with existing residential buildings in the area. The project includes a rezone to the vacant industrial site in an area

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with residential and commercial uses (industrial located further to the west across SR-34). Required compliance with the CMC and General Plan, as well as plan/design check through departmental review would ensure consistency with applicable land use plans, policies and regulations. The project would maintain sidewalk access along Barry Street and SR-34. There are no required bicycle parking requirements in the RPD zone. As such, the Applicant is not required to provide bicycle parking.

### **Response 6.20**

The commenter concludes by stating that the City should revise and recirculate the IS-MND and/or prepare an EIR and states the City should contact the commenter if there are any questions or concerns on their comments.

Please refer to Responses 6.1 through 6.20, no significant environmental impacts warranting preparation an EIR or recirculation of the Draft IS-MND have been identified. The City will contact the commenter if the City has any questions.

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## Area Housing Authority of the County of Ventura

1400 West Hillcrest Dr. Newbury Park, CA 91320-2721

(805) 480-9991 · FAX (805) 480-1021

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Serving Camarillo, Fillmore, Moorpark, Ojai, Simi Valley, Thousand Oaks, and the unincorporated areas of Ventura County

VIA E-MAIL

November 19, 2020

Jaelyn Lee, Principal Planner  
City of Camarillo, Community Development  
601 Carmen Drive  
Camarillo, CA 93010

RE: Response to Mitchell M. Tsai, Attorney At Law Letter dated November 13, 2020

Dear Ms. Lee,

As lead developer, the Area Housing Authority of the County of Ventura acknowledges that the project is a “public work” as defined California Labor Code Section 1720 and accordingly will require that prevailing wages shall be paid on the project, that the project, general contractor(s) and subcontractors are appropriately registered as required in the Labor Code, that certified payrolls are reported in the manner prescribed by the Department of Industrial Relations and that the applicable Labor Code provisions related to apprentices are followed.

Sincerely,

Michael Nigh  
Executive Director

