

PLANNING DIVISION
214 SOUTH C STREET
OXNARD, CALIFORNIA 93030
(805)385-7858
Fax (805) 385-7417



March 21, 2019

Mr. Tom Tellefsen
Channel Islands Harbor Properties, LLC
270 N. Canon Drive
Beverly Hills, CA 90210
(Via Email and First-Class Mail: Ttellefsen@me.com)

Mr. Mark Sandoval
Harbor Director
Channel Islands Harbor
Ventura County Harbor Department
3900 Pelican Way
Oxnard, CA 93035-4367
(Via Email and First-Class Mail: Mark.Sandoval@ventura.org)

Subject: *Determination of Application Completeness*
Planning and Zoning Permit No. PZ18-410-01 (Local Coastal Plan Amendment)
Property located on the Southwest Corner of Channel Islands Boulevard and
Victoria Avenue (Fisherman's Wharf)

Dear Mr. Tellefsen and Mr. Sandoval:

The City is in receipt of the February 25, 2019 correspondence and supporting materials from Mr. Sandoval, which the City first received via e-mail on March 6, 2019. Through narrowing of the scope of the project since the original submittal on January 25, 2018, the County (on behalf of Channel Islands Harbor Properties, LLC, hereafter, the "Developer") is requesting approval of a project-specific Local Coastal Plan Amendment (LCPA) to support the future construction of the Fisherman's Wharf Project. As you know, this project is proposed to include 400 market rate residential units and 36,000 square feet of commercial and retail development.

In accordance with the City of Oxnard Application Submittal Requirements, this application has been found to be complete for processing at this time.

Project Questions/Clarifications

In order to facilitate the processing of this application, the Community Development Department has questions and requests for clarification that will help inform our work as we advance this application. The densities that would be allowed by the proposed LCPA will require sufficient water, sewer capacity, and parking and will also result in visual character changes. The Developer's requested responses will help the Planning Commission and City Council better understand the impacts of the LCPA and the way in which such impacts would be addressed.

Traffic/Parking

While there are a number of deficiencies in the Traffic and Parking Studies, Staff has identified the following significant concerns regarding these studies:

1. Parking Requirements – The parking standard under the Public Works Plan (PWP) is the County's Development Code. However, the standard of review for the City's consideration of an LCPA is the City's Development Code, not the PWP. The County failed to use the City's Coastal Zoning Ordinance (Chapter 17) to evaluate the parking requirement associated with the proposed project-specific LCPA. Any analysis must show how the parking plan meets the intent and requirements stipulated in the Harbor Channel Islands (HCI) zoning, Subzone and all other relevant Chapter 17 provisions. Further, when evaluating the parking requirements for the project based upon our City Codes, the project is significantly under parked. Further still, the project does not appear to be complying with the State of California Building Code pertaining to handicapped accessibility requirements (Americans with Disabilities Act). This will further impact the parking deficiency.
2. Circulation and Access – The proposed full access at the center and southern driveway of Victoria Ave. is not acceptable to the City due to safety concerns. This will impact the traffic study.
3. Traffic Study – The intersection calculation worksheets identify that there is an impact to specific intersections but the report narrative does not acknowledge these impacts. Additionally, the traffic study did not consider truck traffic in the analysis. This will impact the sufficiency of the traffic study.

We are happy to meet with you to go over comments in further detail; a summary of comments regarding these studies and reports is contained in Attachment A.

Visual Impact Analysis

Additional analysis is needed to determine how the project complies with relevant coastal access visual policies and if the project will impede views to the water from Victoria Avenue and Channel Islands and Harbor Boulevards. To date, the Developer has not provided a view analysis.

Hydraulic Modeling Results

1. A site plan was not included in the Hydraulic Modeling Results letter but the site plan included in the project traffic study indicates that the existing sewer lift station (LS #27) is within the footprint of the proposed new project and must be relocated or eliminated. This will significantly affect the cost estimate found on page 9 of the study. This modification will necessitate discussions with the City for its relocation.
2. The Hydraulic Modeling Results letter is classified as an engineering report and should be signed and sealed by the engineer responsible for its preparation.
3. The document indicates that all day-to-day domestic and irrigation water for the project will be obtained from the Channel Islands Beach Community Services District ("District"). Please provide the City with a "Will-Serve" letter from the District to verify their concurrence with the calculations and ability to provide the requested water to the project that would be

- allowed by the LCPA. The City has not performed a verification of the domestic water use calculations.
4. Please update Figure 3 on page 5 to differentiate between City of Oxnard facilities and District facilities (sewer).
 5. Table 3 lists the peak dry weather flows for the project but the wastewater system (both lift station and downstream force mains) must be designed based on peak wet weather flows.
 6. Page 7 of the report indicates that approximately 2,300 gallons per minute (gpm) would be required via interconnects with the City of Oxnard water system to meet City fire flow standards. A Memorandum of Understanding (MOU) is required between the District and the City of Oxnard covering these interconnections. While an MOU was initially entered into in 1973 with a 30-year term that discussed "Emergency Fire Water Supply", the MOU term was last extended by 3 years to 2006. An MOU is required for emergency fire water supply. All subsequent agreements have been solely in regards to wastewater issues. Please provide a copy of any current MOU covering this issue. If no current MOU exists, the project cannot rely on the City water system to meet project fire flow needs.
 7. Table 4 on page 7 of the report needs to have units assigned to the table. The assumption is that the table is in pounds per square inch.
 8. Page 8 of the report indicates that the headloss (at 11 feet per 1000 feet) in the District's 8" force main in Victoria Avenue is calculated to "slightly" exceed the 10 feet per 1000 feet recommendation. The District should indicate if this variance is acceptable.
 9. Page 8, Section 2.2 – As stated in the report, lift station (LS) (#27) is owned/operated by the City of Oxnard. The report should indicate that LS #27 and the associated 4" force main need to meet City operating parameters, not District standards.
 10. Page 6, Section 1.2 of the report states that "all sewer flow is assumed to travel through City of Oxnard Lift Station No. 27." Use of lift stations is never a first choice and the study must evaluate the potential for providing a gravity based wastewater discharge instead of assuming use of a lift station. The configuration of wastewater lines at the Victoria/Channel Island intersection has been altered since installation of the lift station in the late 1970s and may provide opportunities that did not exist at that time.
 11. Page 8 of the report indicates that the existing wastewater flow to LS #27 is 20 gpm during peak wet weather flow. The report must make clear what facilities/structures currently contribute to this 20 gpm. The report must also indicate how the 20 gpm peak wet weather flow was determined.
 12. Page 8 of the report states that "the inflow into the wet well increases from 20 gpm in current peak wet weather flows to 187 gpm with the proposed peak wet weather flows." Table 3 of the report on page 6 indicates that the project generates 187 (186.6) gpm "Peak Dry Weather Flow" but this number seems to be used as peak wet weather flow. The system must be designed under a peak wet weather flow scenario plus 20% capacity.
 13. Table 3 doesn't include a separate line item for the existing 20 gpm flow. Please clarify if this flow is generated from existing structures included in the line items for "Restaurant", "Retail", and "Office" or if the 20 gpm is in addition to these listed uses.

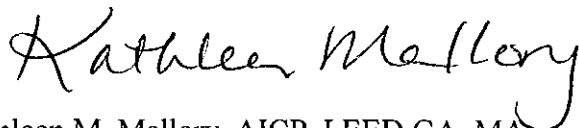
Next Steps

To assist in our analysis, it would be helpful if your office could provide a response to the above questions by April 12, 2019 so that we can advance your application to the Planning Commission. We have tentatively scheduled the item for Community Workshop on April 22nd. In order to properly evaluate your project, please provide a response to the questions identified in this letter by April 12th. With receipt of this information, we will be able to schedule this item for consideration before the Planning Commission in May or June.

Finally, the mailing labels for the development project are more than a year old. Consistent with City policy, mailing labels are required to be no more than six months old. In an effort to help facilitate and advance the processing of the LCPA, the City will prepare this list at no charge to the Developer. Property owners within 300 feet of the boundary of the Harbor will be notified and the distribution boundary will mirror the map you provided with the Developer's January 2018 submittal. Additionally, interested parties who have requested notification regarding the project and those participating in the Community Workshop process will receive notification.

For further information regarding this letter, please contact me at 805-385-8370 or Kathleen.Mallory@oxnard.org.

Sincerely,



Kathleen M. Mallory, AICP, LEED GA, MA
Planning & Environmental Services Manager

cc: Alexander Nguyen, City Manager
Ashley Golden, Assistant City Manager
Jeffrey Lambert, Community Development Director
Kenneth Rozell, Assistant City Attorney
Marilyn Miller, Harbor Department Director of Planning
Robert Orellana, Assistant County Counsel (via email)

Attachment A – Traffic Study Comments

Memo

Development Services - Engineering



ATTACHMENT A

DATE: March 19, 2019
TO: Kathleen Mallory, Planning Manager
FROM: Earnel Bihis, Development Services Assistant Traffic Engineer
SUBJECT: Comments on Fisherman's Wharf Traffic Study and Parking Analysis

On March 13th I received copy of the Channel Islands Fisherman's Wharf Traffic and Circulation Study (dated May 20, 2016) together with its supplemental report (dated November 8, 2016) and the Draft Supplemental Project Access Analysis for the Fisherman's Wharf Mixed-Use Project report (dated October 12, 2016) from Dennis Lammers of Stantec; Traffic Engineer. I also received on March 6th copy of the Parking Analysis report prepared by the Director of Harbor Planning & Redevelopment, Channel Islands Harbor.

I have reviewed the document in detail and discussed the traffic study report with Ryan Kim (City Traffic Engineer). The documents are complete but I have the following more detailed comments regarding the report calculations and the project's impacts on the City's roadway system.

TRAFFIC STUDY REPORT

1. Fill-out the size and the Net External Trips for Multi-Use Development of each land use in the worksheets for Multi-Use Development Trip Generation and Internal Capture Summary.
2. Revise second sentence of paragraph 3 of page 1 of the report indicating the correct Table number where the overview of the proposed land use modifications are show.
3. Show in the report the most recent project site plan consistent with the project site plan exhibits as part of the Draft Supplemental Project Access Analysis for the Fisherman's Wharf Mixed-Use Project report dated October 12, 2016 and the Supplemental Traffic and Circulation Study report dated November 8, 2016.
4. Revise the description of Victoria Ave on paragraph 6, page 4 of the report to indicate that Victoria Ave. is a primary arterial between Gonzales Rd and Channel Islands Blvd and local arterial south of Channel Islands Blvd.
5. Traffic study analysis shall apply a yearly growth of 2% to factor the annual traffic growth in the study area until the project is expected to be fully operational and occupied.

6. Traffic study shall include brief description as to the day, hours, frequency and other operational activity related to the military base delivery/pick-up operation using trucks/semi-trucks are occurring.
7. Traffic study did not consider truck traffic in the analysis. The traffic study shall include analysis that incorporates the impact of truck traffic in the LOS performance of the studied intersections since the Victoria Ave. and Channel Islands Blvd. are designated truck routes.
8. Verify the v/c (volume to capacity) ratio data listed on Table 3, Table 7 and Table 8 to be consistent with the result of the analysis as shown on calculation worksheets related to each intersection. Most of the v/c shown on those tables is not consistent with the results shown on the calculation worksheets. Example of those inconsistencies are v/c data shown for intersection Nos. 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12 and 13. Use the results shown on the calculation worksheets and reflect those results on Table 3, Table 7 and Table 8. Revise the traffic study report accordingly.
9. Based on the results of the analysis shown on the calculation worksheets, the project will worsen the v/c by 0.02, thus, the project shall mitigate the impact on the following intersections:
 - a) Victoria Ave and Doris Ave. (am peak hour)
 - b) Ventura Rd and Channel Islands Blvd (pm peak hour)
10. There are only five (5) intersections in the City of Oxnard that the City Council allowed to perform worse than LOS C and Victoria Ave. Monaco Drive is not one of them. Based on the results of the analysis shown on the traffic study calculation worksheets, the project will worsen the intersection to LOS D during AM peak hour. Based on the traffic study, a traffic signal is necessary to mitigate the impact and other project will install the traffic signal as part of that project. Condition of approval for this project shall include installation of traffic signal at the intersection of Victoria Ave and Monaco Drive including construction of a bus pull-out for Gold Coast transit prior to issuance of building permit if other project has not construct the improvements.
11. Based on the results of the analysis shown on the calculation worksheets for cumulative plus project, the project will worsen the v/c at the intersection of Victoria Ave and Channel Islands Blvd by 0.05, thus, the project shall mitigate the impact on the intersection. Revise sentence 2, paragraph 5, page 16 of the study report to indicate that the project indeed generate significant cumulative impact at the intersection of Victoria Ave. and Channel Islands Blvd. The description under the Cumulative Mitigations on page 21 of the report acknowledges this impact.
12. Revise Table 10, page 20 of the study report to show column 2 as Cumulative PM Peak Hour and Column 3 as Cumulative plus Project PM Peak Hour.
13. Revise Column 4's v/c change for intersection No. 10 as 0.05 as opposed to .04.
14. Revise description of project specific mitigations on page 21 of the study report based on the results of the analysis as shown on the calculation worksheets for Existing plus project and Cumulative plus project impact. The traffic study report shall describe the proposed mitigation measure on each intersection that the project will impact.
15. Revise the project specific mitigations on page 21 of the report related to access along Victoria Ave. based on comments shown under the Site Access and Circulation Analysis Report.

SITE ACCESS AND CIRCULATION ANALYSIS REPORT

1. Based on the Site Access and Circulation analysis report, it is proposed to reconstruct the existing median along Victoria Ave fronting the project site to align the median openings with the center and southern driveways to accommodate full access with left-turn ingress and egress turns at the driveways. The speed limit along Victoria Ave, south of Channel Islands Blvd., is 50 mph. The project will substantially increase the traffic that will use the proposed access with left-turn ingress and egress at those driveways especially during am peak hour. Crossing two lanes of traffic and a 16-foot median at the proposed center and southern driveways allowing full access with left-turn egress from the project site without type of control poses a safety concern.
2. Eliminate the egress left-turn traffic out of the proposed center and southern project driveways along Victoria Ave. and bring traffic to where it can safely make the turn.
3. When traffic is diverted to where it can safely make the turn, provide adequate room or paved area to make the turn. Provide exhibit showing the turn of a 19-foot passenger car per AASHTO Standard. In situation where traffic will be diverted to a signal control intersection, evaluate the impact of the diverted traffic to the level of service performance of that signal control intersection and come-up with measures to mitigate the impact, if there is/are.

PARKING ANALYSIS

Based on the project site plan exhibits as part of the Draft Supplemental Project Access Analysis for the Fisherman's Wharf Mixed-Use Project report dated October 12, 2016 and the Supplemental Traffic and Circulation Study report dated November 8, 2016, parking facility at the ground floor level of the apartment building will provide 648 standard spaces, 6 compact spaces and 140 tandem spaces (with a total of 794 parking spaces. The project will also provide 129 standard spaces and 2 handicap spaces with a total of 131 parking spaces located at the surface parking lot within the retail area.

Per the parking analysis report prepared by the Director of Harbor Planning & Redevelopment of the Channel Islands Harbor, the apartment component of the project requires a total of 739 spaces (it did not specify if tandem parking are credited towards project parking requirements) and the commercial component (retail, office and restaurants) requires 223 spaces with a project total parking space requirement of 962. The report also indicated that the project is proposing to provide 865 parking spaces within the first floor garage of the apartment building which is NOT consistent with the counts as shown in the project site plan exhibit of the Draft Supplemental Project Access Analysis for the Fisherman's Wharf Mixed-Use Project report dated October 12, 2016 and the Supplemental Traffic and Circulation Study report dated November 8, 2016. The exhibit shows 794 spaces for the apartment building, including tandem parking spaces. Thus, the total number of parking spaces being provided by the project is only 925 spaces (794 plus 131) and under parked by 37 parking spaces based on County requirements.

Per City of Oxnard parking requirements, the apartment component of the project requires a total of 855 spaces and the commercial component (retail, office and restaurants) requires 320 spaces with a project total parking space requirement of 1,175. Per Section 16-622, sub-section E.1 of the City of Oxnard Zoning Ordinance; applicant may propose to provide tandem parking spaces for a proposed use. However, tandem spaces, whether or not in garages and whether for residents, visitors or customers of the proposed use, shall not be counted toward satisfaction of the parking requirement for the proposed use.

Based on the above data and information, the project's proposed number of parking spaces based on counts shown on the project site plan exhibit does not meet the City of Oxnard parking requirements for the apartments (855 minus 654 = 201 parking spaces under parked) and the commercial (320 minus 131 = 189 parking spaces under parked). The total number of parking spaces that the project is under parked is 201 plus 189 = 390 parking spaces based on the City of Oxnard parking standard. It should also be noted that based on the project site plan exhibit, the plan does not show any provision for handicap parking spaces for the apartment building and inadequate handicap parking for the surface parking lot within the retail area. The inadequacy of handicap parking spaces will further reduce the number of parking spaces that the project provides since handicap parking requires access aisles.