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September 25, 2023

Governor's Office of Planning & Research

Iain Holt, Senior Planner, AICP
Community Development Department, Planning Division
City of Thousand Oaks
2100 Thousand Oaks Boulevard
Thousand Oaks, CA 91362

Sep 26 2023**STATE CLEARINGHOUSE**

RE: 2045 General Plan Update
SCH # 2022060087
Vic. LA-101, LA-23. Citywide
GTS # VEN-2022-00554-DEIR

Dear Iain Holt:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. Thousand Oaks 2045 General Plan Update is a comprehensive update to the City's existing General Plan which was originally prepared in 1970. The proposed project consists of updates to the Thousand Oaks General Plan, including the Land Use and Element, Mobility Element, Parks and Open Space Element, Conservation Element, Community Facilities and Services Element, Arts and Culture Element, Safety Element, Noise Element, Governance Element, and Implementation Actions to mobilize and execute the goals and policies included in the General Plan. The General Plan Update could lead to an additional 7,871 new housing units and 11,845 new jobs in the City.

The proposed project's impact on the 2045 citywide VMT per service population falls short of achieving a minimum 15% reduction from the existing levels. Consequently, the proposed project does not align with CEQA Guidelines Section 15064.3, Subdivision (B), resulting in a significant and unavoidable impact.

Despite a 7.7% decrease in VMT rates anticipated with the proposed project's implementation compared to the current conditions, Thousand Oak's VMT per service population is projected to reach 28.68 in 2045. This figure exceeds the threshold of 26.42, which corresponds to a 15% reduction from the existing VMT per service population of 31.08. The Mobility Element of the proposed project includes policies and implementation actions that specifically focus on VMT reduction programs:

- **Policy 6.1 Decrease vehicle trips.** Prioritize transportation and development investments and strategies that reduce single-occupancy vehicle trips.
- **Policy 6.2 Decrease vehicle miles traveled.** Prioritize pedestrian, bicycle and other micro-mobility transportation means, and transit enhancements. Encourage infill, mixed-use, and other land use development that locates resources and services near residents' homes.
- **Policy 6.3 Emissions reduction.** Support and encourage the adoption of low- and zero-emission vehicles, clean vehicle technologies, charging infrastructure and services to reduce GHG emissions from vehicles.
- **Policy 6.4 Transportation Demand Management (TDM).** Promote and incentivize the use of TDM strategies for employers and expand options for emission reductions from commuting through means such as vehicle sharing, alternative fuel vehicle support, and telecommuting.
- **Implementation Action M-A.7 VMT-based transportation analysis policy and VMT mitigations for environmental review.** Adopt and implement the City's Vehicles Miles Traveled (VMT) Analysis Guidelines, which defines VMT-based thresholds of significance for transportation impacts in environmental review and identifies TDM-based mitigations.

Before the City officially adopts VMT analysis Guidelines as outlined in Implementation Action M-A.7 of the proposed project, interim measures are in place. For projects exceeding the City's recommended VMT threshold, determined through project-specific VMT analysis, the City will require project applicants to implement VMT reduction strategies. These strategies will be designed to reduce VMT from existing land uses, where feasible and from new discretionary residential or employment land use projects. The focus of these programs and project-specific mitigation will center on VMT reduction strategies that enhance travel options and promote shared rides through private vehicles, public transit, biking, or walking. These strategies may include, but not limited to:

1. Provision of bus stop improvements or on-site mobility hubs
2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.
3. Bicycle programs, including bike purchase incentives, storage, maintenance programs, and on-site education program
4. Enhancements to the citywide bicycle network
5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes
6. Cash allowances, passes, or other public transit subsidies and purchase incentives
7. Providing enhanced, frequent bus service
8. Implementation of shuttle service

Following the City's adoption of VMT Analysis Guidelines, individual projects shall be evaluated and mitigated in accordance with the procedures outlined in the VMT Analysis Guidelines.

After Mitigation Measure TRA-1 for the General Plan, the individual projects may not consistently meet adopted VMT Analysis Guidelines or effectively mitigate VMT to stay below thresholds. Therefore, the project's impacts related to VMT would be significant and unavoidable. We would recommend the City to consider the following policy/measures for all future projects:

1. A post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City's VMT traffic model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

2. VMT Fee Program for all development within the City boundary in which the program has the potential to address transportation funding challenges, promote sustainability, and offer more flexible and equitable approaches to financing and managing transportation systems. Alternatively, the City may consider a new concept of VMT mitigation banks and exchanges. You may learn this new concept from the following link.

<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/research-notes/task3886-rns-5-21-a11y.pdf#:~:text=A%20well%20developed%2C%20carefully%20structured%20VMT%20mitigation%20bank,pay%20for%20VMT%20reductions%20elsewhere%20in%20the%20region.>

3. For future projects any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.

Iain Holt
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If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # VEN-2022-00554-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse