

# **Appendix L**

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## Traffic Memo

**TO:** Scott Kolwitz, Senior Planner

**FROM:** Kathy Naoum, Transportation Planner

**DATE:** October 21, 2022

**SUBJECT: DP 2022-70824 1300 Lawrence Drive  
Traffic Impact/Trip Generation Analysis**

The proposed project is located at 1300 Lawrence Drive and would demolish the existing 820 space surplus parking lot to construct a new 120,384 square foot, two-story industrial warehouse building. This memo summarizes the trip generation estimate for the site based on this development proposal.

**Trip Generation**

The site’s trip generation estimates were derived from the 11<sup>th</sup> Edition Manual of *Trip Generation* published by the Institute of Transportation Engineers (ITE) Land Use #150 (Warehouse). For this analysis, the P.M. peak hour trip generation rates are presented since the City’s current administrative policy (Vehicle Miles Traveled (VMT) Analysis for CEQA Compliance) for requiring traffic impact studies or Vehicle Miles Traveled analysis considers the trips generated during a project’s P.M. peak hour. A copy of the City’s interim administrative VMT Policy and Procedures is attached to this memo which describes the VMT screening process.

Trip Generation

Table 1 summarizes the estimated number of P.M. peak hour trips to be generated by the proposed use.

<b>Table 1</b>			
Trip Generation -Proposed Land Use			
ITE Land Use Number and Type of Use	Number of Square Feet	P.M. Peak Hour	
		Rate per KSF	<b>Trips</b>
150 Warehouse	120,384	0.18	<b>22</b>

Standard City practice for requiring a Traffic Impact Study and a Vehicle Miles Traveled (VMT) analysis is when a project is expected to generate an additional 100 PM peak hour trips over the current land use. Since the proposed project is estimated to generate 22 PM peak hour trips, both a traffic impact study and a VMT analysis is not required.

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Kathy Naoum  
Transportation Planner

# City of Thousand Oaks

## Administrative Policies and Procedures

<b>SUBJECT:</b> Vehicle Miles Traveled (VMT) Analysis for CEQA Compliance	<b>APP NO.:</b> 12-14.009	<b>AUTHORITY:</b> City Manager
<b>DEPARTMENT: DPW and CDD</b>	<b>Submission Date:</b> June 29, 2020  <b>Revision Dates:</b>	<b>Adoption/Approval Date:</b> July 1, 2020  <b>Revision Dates:</b>

### PURPOSE:

Establish an interim Citywide policy using Vehicle Miles Traveled (VMT) as the metric to measure transportation impacts from proposed development projects on a case by case basis pursuant to Government Code 15064 (b) (2) in conformance with the California Environmental Quality Act (CEQA) and in compliance with Senate Bill (SB) 743.

### BACKGROUND:

1. Senate Bill (SB) 743 amended the California Environmental Quality Act (CEQA) in 2013 with the intent to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions”. According to the State legislature: “New methodologies under the California Environmental Quality Act were needed for evaluating transportation impacts that are better able to promote the State’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.”
2. SB 743 required the Governor’s Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use development projects, OPR identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. For transportation projects, lead agencies for roadway capacity projects have discretion, consistent with CEQA and planning requirements, to choose which metric to use to evaluate transportation impacts.

### POLICY:

1. This interim Administrative Policy will serve as a guideline for application of the VMT metric for CEQA transportation analysis as directed by SB 743. This policy will remain in effect until the Thousand Oaks General Plan (“General Plan”) update or other action by the City Council adopts a permanent VMT policy.
2. Government Code Section 15064.3 (“Determining the Significance of Transportation Impacts”), subsection (b) (“Criteria for Analyzing Transportation Impacts”), part (4) (“Methodology”) gives a lead agency the discretion to choose the most appropriate

methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. Further, Government Code Section 15064.3(b)(4) states: "A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

3. The thresholds of significance used to measure VMT will be determined on a case by case basis as specified in CEQA Government Code Section 15064.7(b) which states "Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2)", which further states "Thresholds of significance, as defined in Section 15064.7(a), may assist lead agencies in determining whether a project may cause a significant impact. When using a threshold, the lead agency should briefly explain how compliance with the threshold means that the project's impacts are less than significant."

### **Department Procedures**

1. The Community Development Department (CDD), on behalf of the City of Thousand Oaks, will be the lead agency for all private land use entitlements requiring CEQA analysis and in coordination with the Public Works Department (PWD) facilitate the VMT screening and further project analysis as part of environmental document preparation.
2. Once there is a determination to conduct a Traffic Impact Analysis (TIA), the Public Works Department will take the lead in contract coordination with a traffic consultant and facilitate the technical aspects of the TIA with the Community Development Department and applicant.
3. The Public Works Department (PWD) will be the lead agency for all Capital Projects requiring a CEQA analysis and coordinate review of TIAs with CDD as part of environmental document preparation.

### **Project Screening**

Any project subject to CEQA review, that is not determined to be exempt per the State CEQA Guidelines, will require an initial screening to determine if the project warrants further transportation assessment. A project will be determined to have a less than significant impact, and no further transportation impact analysis will be required, if it meets either of the following screening criteria:

1. Trip Generation: Any project that generates less than 100 P.M. peak hour trips based on the ITE 10th Edition Trip Generation Manual or most current edition published at the time the project application is submitted.
2. Low VMT Area: This criteria includes a map-based approach. Different sections of the City display different VMT characteristics based on land use and other factors. Areas where the General Plan favors intensification of development are generally areas of low average VMT. The following methodology shall be used for determining if a project meets the map-based screening threshold:
  - a. The proposed project must be consistent with the General Plan designation and zoning.
  - b. The Ventura County Transportation Commission (VCTC) has produced a countywide model for VMT and will provides maps to member agencies when available. The PWD will obtain and maintain the most current map for the purpose of this interim policy.
  - c. For projects located in low VMT areas, the applicant must demonstrate that the project will result in a similar level of VMT as the surrounding land use within the Transportation Analysis Zone (TAZ), as shown on the best available map approved by CDD and PWD staff for project analysis. Where the project site is on the boundary of another TAZ, the same low VMT as the TAZ the project site is located must be determined. The VMT methodology may use VMT per capita, per employee, or net VMT as allowed by the Government Code.

Projects that do not meet these criteria will require a Traffic Impact Analysis (TIA) to determine the project's environmental impact.

### **Traffic Impact Analysis (TIA)**

Projects not screened as Less Than Significant transportation impacts based on the screening criteria would be required to undergo a CEQA Transportation Impact Analysis (TIA). The Travel Demand Model will be used to determine the project's VMT. The VMT will be presented as VMT per capita for residential projects and VMT per employee for employment projects (retail, office, industrial). Project VMT may be determined through new model runs or by using the VMT per capita and per employee for the current land uses in the model TAZ that would contain the proposed project.

A TIA must identify the existing condition of pedestrian, bicycle, transit and vehicular transportation systems and facilities that would serve, or may be affected by, the proposed Project. Further analysis of site design and access, neighborhood traffic issues, local transportation safety and other area transportation issues may also be studied as directed by the Public Works Department.

## **Mitigation Measures**

If a significant transportation impact is identified for a project, mitigation measures and an implementation plan will be required to reduce impacts to a Less Than Significant level. Some options include provision of on-site transportation infrastructure, on-site transportation demand management, off-site infrastructure improvements, including roadway improvements which may also include active transportation and multimodal infrastructure, or off-site multimodal improvements.