

DRAFT CHANGES TO INITIAL STUDY ASSESSMENT GUIDELINES 30 DAY PUBLIC REVIEW PERIOD (LEGISLATIVE VERSION)

Exhibit 1

PROPOSED UPDATE TO SECTION 27A(1) TRANSPORTATION & CIRCULATION SECTION OF THE INITIAL STUDY ASSESSMENT GUIDELINES TO INCLUDE INTERIM VEHICLE MILES TRAVELED THRESHOLDS AND METHODOLOGY AND APPENDIX B VEHICLE MILES TRAVELED ESTIMATION; AND REMOVE LEVEL OF SERVICE THRESHOLDS AND METHODOLOGY WITH RECOMMENDED CHANGES IN LEGISLATIVE FORMAT

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**27a(1). Transportation & Circulation - Roads and Highways -
~~Level of Service (LOS)~~ (Interim) Vehicle Miles Traveled**

A. Definition of Issue

~~Senate Bill (SB) 743 (2013) changed the way transportation impacts are identified in the California Environmental Quality Act (CEQA) and required the Governor's Office of Planning and Research (OPR) to develop new CEQA Guidelines that address transportation impact metrics under CEQA. OPR identified Vehicle miles traveled (VMT) as the preferred metric for assessing passenger vehicle-related impacts. Pursuant to SB 743, as of July 1, 2020, lead agencies are required to utilize VMT in evaluating vehicle-related impacts under CEQA. The OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) provides recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The VMT assessment, thresholds of significance and mitigation measures identified in this section are derived from this technical advisory and are consistent with the minimum VMT reduction standards .~~

~~Roadway Level of Service (LOS) is the perception by the users of a traffic facility of the quality of service provided by that roadway. LOS is a stratified system, represented by the letters "A" through "F" with "A" representing the most favorable driving conditions and "F" representing the least favorable.~~

B. Definition of Technical Terms

~~Vehicle Miles Traveled (VMT) - A measure of the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in a county.~~

~~Average Daily Trip (ADT) - The total bi-directional volume of traffic passing through a given point during a given time period, divided by the number of days in that time period.~~

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~~Peak-Hour Trip (PHT) – A single or one-direction vehicle movement with either the origin or destination (exiting or entering) being a project site or study area during the peak hour or peak period associated with that project or study area.~~

~~Peak-Hour Turning Movements (PHTM) – The highest hourly number of vehicles turning left, going straight or turning right on each approach of an intersection during an average weekday.~~

~~Service Flow Rate – The service flow rate is the maximum hourly rate at which persons or vehicles reasonably can be expected to traverse a point or uniform segment of a lane or roadway during a given period under prevailing roadway, traffic, and control conditions while maintaining a designated LOS. Service flow rates are discrete values, whereas LOS represents a range of conditions. Because service flow rates are the maximums for each LOS, they effectively define the flow boundaries between LOS.~~

~~Thoroughfare (TF) – Any road that is part of the regional road network.~~

~~Trip Generation Rate (TGR) – The number of vehicle trips per unit of land use using a site’s driveways. Rates may be for the entire day, peak hour of the generator or of the adjacent street.~~

~~Traffic Impact Study (TIS) – An engineering study which describes how a new development or redevelopment would affect the area’s local and regional transportation system and identifies measures to mitigate impacts from the project.~~

~~Traffic Impact Mitigation Fee (TIMF) - Fees assessed on all applicants for development approval for the construction of off-site transportation infrastructure improvements necessitated by new development and development expansion or intensification. TIMF’s are generally intended to mitigate cumulative traffic impacts.~~

~~Volume/Capacity Ratio (V/C) – The ratio between the existing or projected volume of traffic using a transportation facility and the capacity of that facility. The capacity is defined as the maximum hourly rate at which persons or vehicles can reasonably be expected to traverse a point or uniform section of a lane or roadway during a given time period under prevailing roadway, traffic and control conditions.~~

C. Applicable General Plan Goals and Policies

The County of Ventura has an adopted General Plan and Area Plans that contain specific transportation and circulation goals, policies, standards and programs that are applicable to development in the County, subject to project evaluation during policy consistency analysis.

~~The following goals and policies of the Ventura County General Plan are applicable to this issue:~~

~~Countywide Goals, Policies and Programs:~~

~~Goals 4.2.1-1, -2, & -4 through -6~~

~~Policies 4.2.2-2 through 6~~

~~**Ojai Valley Area Plan:**~~

~~Goal 4.1.1-1~~

~~Policies 4.1.2-2 through -5~~

~~**Thousand Oaks Area Plan:**~~

~~Goal 4.1.1-3~~

~~Policy 4.1.2-2~~

D. Threshold of Significance Criteria

Residential Land Uses

OPR recommends a VMT per capita threshold set at 15 percent below baseline levels. Using the VCTC model, the average trip length of all home-based model trip types was used as a surrogate for a per capita estimate. Based on the VCTC baseline model, the average trip length for all home-based trips is 9.66 miles. Applying the 15 percent reduction yields a VMT Threshold for residential land uses of 8.21 miles.

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Non-Residential Land Uses

For non-residential land uses, OPR identifies three basic land use categories of office, retail and mixed land use described further below:

1. **Office Land Use:** the average trip length of home-based work trips, was used as a surrogate for a per employee estimate. Based on the VCTC baseline model, the average trip length for home-based work trips is 13.52 miles. Applying the 15 percent reduction yields a VMT Threshold for office land uses of 11.49 miles.
2. **Retail Land Use:** attract many kinds of trip types (i.e., home-based and non-home -based trips). It generally redistributes existing retail trips rather than creating new trips, OPR recommends using no net change in either project or regional VMT. Given this programmatic application, the unincorporated trip-based VMT estimate was used to establish this VMT threshold.
3. **Mixed Land Use:** development (typically includes a combination of residential and retail/office uses), OPR guidance suggests applying the threshold of one (or more) of the land uses. Given that land use growth under the 2040 General Plan can be thought of as one holistic mixed-use development, the application of the residential, office, and retail thresholds inherently reflects mixed-use development.

Relationship to Industrial/Agricultural and Non-Residential Land Use Category: Given that the predominant non-residential land uses in Ventura County are industrial and agricultural, these land uses can generally be associated with the OPR non-residential land use categories. For instance, industrial uses can be considered analogous with office uses in terms of associated work trips, while agriculture is unique and would be treated similarly to retail: no net change in either project or regional VMT.

Roadway Improvement Projects

OPR recommends no net change in either project or regional VMT for roadway improvement projects. The VCTC model includes currently programmed roadway improvement projects included in the Federal Transportation Improvement Program. Programmed improvements have an identified funding source and are therefore considered as part of the future baseline under CEQA. The VCTC model VMT output inherently captures the potential induced VMT associated with these projects (i.e., longer trip lengths related to improved access; mode shifts from transit to auto; etc.). Note that the established thresholds for residential and office in this analysis are regionally based and therefore do not distinguish between incorporated versus unincorporated growth or reflect the added length of trips associated with inter-county trips.

Criteria to Determining Level of Significance

The following criteria are to be used to determine the level of significance of an adverse impact. A project will have a significant transportation impact if it would result in VMT exceeding the following thresholds:

1. Residential land uses: 8.21 miles average of all home-based trip types, trip length (15 percent reduction of regional average),
2. Office land uses: 11.49 miles average of all home-based-work trips, trip length (15 percent reduction of regional average),
3. Industrial land uses: 11.49 miles average of all home-based-work trips, trip length (15 percent reduction of regional average),

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4. Retail land uses: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT).
5. Agricultural land uses: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT), or
6. Infrastructure: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT).
7. Result in new trips along roadway facilities with collision or incident rates above Statewide averages and/or those identified by the Statewide Integrated Traffic Records System (SWITRS) as experiencing a high incident rate.
8. Result in inadequate emergency access.
9. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
10. Cause actual or potential barriers to existing or planned pedestrian/bicycle facilities.
11. Generate or attract pedestrian and/or bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities.
12. Cause a substantial interference with existing bus transit facilities and/or routes.
13. Result in substantial increased demand for additional or new bus transit facilities/ services.
14. Result in interference with an existing railroad's facilities and/or operations.
15. Generate an increased demand for commercial boat traffic and/or adjacent commercial boat facilities.
16. Result in substantial interference with or affect the operations of an existing pipeline.

Threshold for residential projects: A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the Sustainable Community Strategy (SCS) for that city and should be consistent with the SCS.

Threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Proposed Projects with Significant VMT Impacts

If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible, by modifying the project's VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes).

The determination of the significance of traffic impacts to a road segment or intersection LOS is based on policies 4.2.2-4 and 4.2.2-5 of the Ventura County General Plan Goals, Policies and

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~~Programs and policy 4.1.2-4 of the Ojai Area Plan. Policies 4.2.2-4 and 4.2.2-5 state: 4.2.2-4. Except as otherwise provided in the Ojai Area Plan, County General Plan land use designation changes and zone changes shall be evaluated for their individual and cumulative impacts, and discretionary development shall be evaluated for its individual impact, on existing and future roads, with special emphasis on the following:~~

- ~~(a) Whether the project would cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable LOS to function below an acceptable LOS;~~
- ~~(b) Whether the project would add traffic to existing roads within the Regional Road Network or the Local Road Network that are currently functioning below an acceptable LOS; and~~
- ~~(c) Whether the project could cause future roads planned for addition to the Regional Road Network or the Local Road Network to function below an acceptable LOS.~~

~~4.2.2-5. Except as otherwise provided in the Ojai Area Plan and below, County General Plan land use designation changes and zone changes that would cumulatively cause any of the impacts identified in subparagraphs (a) through (c) of Policy 4.2.2-4 shall be prohibited unless the Board of Supervisors adopts a Statement of Overriding Considerations. County General Plan land use designation changes, zone changes and discretionary development that would individually cause any of the impacts identified in subparagraphs (a) through (c) of Policy 4.2.2-4 shall be prohibited unless feasible mitigation measures are adopted that would ensure that the impact does not occur or unless a project completion schedule and full funding commitment for road improvements are adopted which ensure that the impact will be eliminated within a reasonable period of time. This policy does not apply to city thoroughfares, city-maintained local roads, or Federal or State highways located within a city unless the applicable city has formally adopted General Plan policies, ordinances, or a reciprocal agreement with the County (similar to Policies 4.2.2-3 through 4.2.2-6) respecting development in the city that would affect the LOS of County thoroughfares, County-maintained local roads, and Federal and State highways located within the unincorporated area of the County. If a Specific Plan for a project has been determined to be consistent with this policy, any subsequent development that is consistent with the Specific Plan will also be determined to be consistent with this policy. (Underscoring added for emphasis)~~

~~Exceptions to the prohibitions of this policy include the following:~~

- ~~(a) Farm worker Housing Complexes, Affordable Housing development per Article 16 of the Non-Coastal Zoning Ordinance, and other housing exclusively for lower-income households, where such developments are served by roads that are currently operating at LOS "E" or better.~~
- ~~(b) Additional dwellings and lots on Cultural Heritage Sites as permitted in the Non-Coastal Zoning Ordinance.~~
- ~~(c) Agriculture and Agricultural Operations as permitted in the Coastal and Non-Coastal Zoning Ordinances, where such developments are served by roads that are currently operating at LOS "E" or better.~~

~~In other words, if a project would generate new traffic to a road segment or intersection that is currently operating at an unacceptable LOS (and the project does not qualify for one of the three exemptions listed above), the project shall be denied unless:~~

- ~~a. The project's traffic impact is fully mitigated;~~

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b. ~~_____ A full funding commitment for road improvements is reasonably available to ensure that the impacts will be eliminated within a reasonable period of time.~~

In addition, Ojai Area Plan policy 4.1.2-4 states:

~~Area Plan land use designation changes, zone changes and discretionary development which would individually or cumulatively cause any of the impacts identified in subparagraphs (a) through (c) of Policy 4.1.2-3 ...[identical to subparagraphs (a) through (c) of policy 4.2.2-4 of the Goals, Policies and Programs] ...shall be prohibited unless feasible mitigation measures are adopted which would ensure that the impact does not occur or unless a project completion schedule and full funding commitment for road improvements are adopted which ensure that the impact will be eliminated within a reasonable period of time. This policy does not apply to city thoroughfares, city-maintained local roads or State highways located within the city unless the City of Ojai has formally adopted General Plan policies, ordinances or a reciprocal agreement with the County ... respecting development in the city that would affect the LOS of the County thoroughfares, County maintained local roads, and State highways located within the unincorporated area of the County.~~

Roadway Segments:

~~**Minimum Acceptable Level of Service** – The minimum LOS for road segments within the Regional Road Network (Ventura County General Plan *Public Facilities and Services Appendix*, Last Amended November 15, 2005, Figure 4.2.3) and the Local Road Network (all other County maintained roads) is shown in Table 1:~~

~~**Table 1 – Minimum Acceptable Level of Service (LOS) for Roadway Segments and Intersections**~~

Minimum LOS	County of Ventura – Description
C	All County maintained local roads.
D	All County thoroughfares and state highways within the unincorporated area of the County, except as provided below.
E	1. State Route 33 between the end of the Ojai freeway and the City of Ojai. 2. State Route 118 between Santa Clara Avenue and the City of Moorpark. 3. State Route 34 (Somis Road) north of the City of Camarillo. 4. Santa Rosa Road between Camarillo city limit line and Thousand Oaks city limit line. 5. Moorpark Road north of Santa Rosa Road to Moorpark city limits line.
Varies	The LOS prescribed by the applicable city for all State highways, city thoroughfares, and city maintained local roads located within that city, if the city has formally adopted General Plan policies, ordinances, or a reciprocal agreement with the County, pertaining to development in the city that would individually or cumulatively affect the LOS of State highways, County thoroughfares and County maintained local roads in the unincorporated area of the County.
	County LOS standards are applicable for any city that has not adopted its own standards or has not executed a reciprocal agreement with the County pertaining to impacts to County roads.

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~~At any intersection between two roads, each of which has a prescribed minimum acceptable LOS, the less stringent LOS of the two shall be the minimum acceptable LOS of that intersection.~~

Note: Roadway capacities can be found in Figure 4.14-2 of the Subsequent Environmental Impact Report for Focused General Plan Update

~~**Project-Specific Impacts** – A potentially significant adverse project-specific traffic impact is assumed to occur on any road segment if any one of the following results from the project:~~

- ~~a. If the project would cause the existing LOS on a roadway segment to fall to an unacceptable level as defined in Table 1.~~
- ~~b. If the project will add one or more PHT to a roadway segment that is currently operating at an unacceptable LOS as defined in Table 1.~~

~~(Projects funded in the County's Capital Improvement Program may be used as mitigation measures. The improvements identified in these projects may be incorporated into the capacity analysis to mitigate project specific impacts.)~~

~~**Cumulative Impacts** – A potentially significant adverse cumulative traffic impact is assumed to occur on any road segment if any one of the following results from the project:~~

- ~~a. If the project will add one or more PHT to a roadway segment that is part of the regional road network and the roadway segment is currently operating at an unacceptable LOS as defined in Table 1.~~
- ~~b. If the project will add 10 or more PHT to a roadway segment which is part of the regional road network and is projected to reach an unacceptable LOS as defined in Table 1 by the year 2020.~~

~~All projects that generate traffic contribute to cumulative traffic impacts. The analysis of cumulative traffic impacts, as contained in the Final Subsequent EIR prepared for the County General Plan Update (2005) and subsequent addendum (2007), would normally be considered sufficient cumulative analysis of traffic impacts. In such cases, payment of County's TIMF is intended to mitigate the project's contribution to the cumulative traffic impacts for road segments outside of the Ojai Valley.~~

~~If the project involves County General Plan land use designation changes, zone changes, or intensification of use, such that the project's impacts could not have been anticipated and were not included in either the analysis for the current General Plan or TIMF Program, or the project is located within the boundaries of the Ojai Area Plan, additional cumulative impact analysis and mitigation measures may be required at the discretion of the Director, County Public Works Agency (PWA) – Transportation Department.~~

Intersections:

~~**Minimum Acceptable LOS** – Minimum LOS for intersections on the Regional Road Network (Ventura County General Plan *Public Facilities and Services Appendix*, Last Amended November 15, 2005, Figure 4.2.3) is shown in Table 1.~~

~~**Project-Specific Impacts** – A potentially significant adverse project-specific traffic impact is assumed to occur at any intersection on the Regional Road Network if the project will exceed the thresholds established in Table 2. (For this analysis scenario, projects funded in the County's Capital Improvement Program may be used as mitigation measures. The improvements identified in these projects may be incorporated into the capacity analysis to mitigate project specific impacts.)~~

Table 2: Thresholds of Significance for Changes in LOS at Intersections

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Intersection LOS (Existing)	Increase in V/C or Trips greater than
A	0.20
B	0.15
C	0.10
D	10 PHTs*
E	5 PHTs*
F	1 PHT*
*To critical movements. These are the highest combination of left and opposing through/right-turn PHTM.	

Cumulative Impacts – A potentially significant adverse cumulative traffic impact is assumed to occur at any intersection if any one of the following results from the project:

- a. If the project will add one or more PHT to the critical movements at an intersection that is part of the regional road network and which is currently operating at an unacceptable LOS as defined in Table 1 by the year 2020.
- b. If the project will add 10 or more PHT to an intersection that is part of the regional road network, which is projected to operate at an unacceptable LOS defined in Table 1 by the year 2020.

Note: All projects that generate traffic contribute to cumulative traffic impact. The analysis of cumulative traffic impacts, as contained in the Final Subsequent EIR prepared for the County General Plan Update (November 2005) and subsequent addendum (April 2007), would normally be considered sufficient cumulative analysis of traffic impacts. In such cases, payment of TIMFs is intended to mitigate the project's contribution to cumulative traffic impacts for intersections outside of the Ojai Valley.

If the project involves County General Plan land use designation changes, zone change, or intensification of use, such that the project's impacts could not have been anticipated and were not included in either the analysis for the current General Plan or TIMF Program, or the project is located within the boundaries of the Ojai Area Plan, additional cumulative impact analysis and mitigation measures may be required at the discretion of the Director, County PWA - Transportation Department.

E. Methodology

Introduction

The evaluation of traffic impacts and development of mitigation measures is a complex task. When the potential for significant adverse traffic impacts is evident (as determined by the Ventura County PWA - Transportation Department), [A Traffic Impact Study \(TIS\) the traffic impact analysis](#), including letter style studies, should be performed under the responsible charge of a registered civil engineer (or registered traffic engineer) that is qualified to perform traffic engineering studies and is familiar with Ventura County. The final report shall be stamped and signed by the responsible [registered civil engineer](#) [engineer \(or registered traffic engineer\)](#) in charge.

Many of the roads in the unincorporated area were originally built as farm-to-market roads and were not designed to current engineered standards. Some roads are in rugged mountainous or canyon areas of

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the County. The cost to upgrade these types of roads to current standard is generally prohibitive. Additionally, rural roads often carry slow moving agricultural traffic, and have adjacent irrigation ditches or farm crossings. Accordingly, a small amount of additional traffic on these types of roads may cause a significant impact due to the character and limited capacity of such roads. The same amount of traffic might not be considered significant in a more modern urban setting.

In some of the communities in the unincorporated area, a policy has been enacted by the Ventura County Board of Supervisors to recognize the uniqueness of the community through adoption of an Area Plan. For example, an Area Plan exists for the Ojai Valley which contains policies that are different from those in the Countywide General Plan relating to transportation. Prior to completing the ~~traffic impact analysis~~TIS, the registered civil engineer must consult the Area Plan transportation policies that apply to the project.

A Traffic Impact Study ~~(TIS)~~ is required for:

- ~~1. Any project that has the potential to generate traffic exceeding the above threshold criteria (project or cumulative); or,~~
- ~~2. Any project that is estimated to generate 10 or more peak-hour trips. Examples of projects that would generate 10 or more peak-hour trips are provided in Table 3.~~

Table 3: Developments Potentially Requiring Traffic Impact Studies	Description
a.	Residential development of 10 units or more
b.	Commercial office projects of 4,400 SF or more
c.	Other commercial projects or medical office projects of 2,400 SF or more
d.	Any fast food restaurant project
e.	Manufacturing or industrial projects of 6,000 SF or more

~~A TIS may also be required if it is known that a project will cause any peak hour impacts to any County road or intersection operating at or below LOS D.~~

- ~~1. Any project that has the potential to result in VMT exceeding thresholds identified in Table 1 below:-~~

Table 1: Vehicle Miles Traveled (VMT) Thresholds of Significance Criteria

<u>Project Type</u>	<u>Metric Unit</u>	<u>Model Trip Types</u>	<u>Target</u>	<u>Baseline VMT</u>	<u>Threshold VMT</u>
Residential	VMT/Capita	Average	15%	9.66	8.21

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		<u>of all Home-Based Trip Types</u>	<u>Reduction of Regional Average</u>		
<u>Office</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Industrial</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Retail</u>	<u>Net Change in Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Agriculture</u>	<u>Net Change in Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Infrastructure</u>	<u>Net Change in Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase</u>	<u>7,500,249</u>	<u>7,500,249</u>

- When required by the County of Ventura Traffic Impact Fee Ordinance (Sections 8601-0 through 8601-7 of the Ventura County Ordinance Code), to determine the amount of the Traffic Impact Mitigation Fees (TIMF).
- When required by the Director of the Public Works Agency— Transportation Department (PWATD) because of safety or operational considerations on County roads that may be impacted by the proposed project.

Preparation of Traffic Impact Studies ~~(TIS)~~:

The applicant is responsible for submitting a TIS ~~Traffic Impact Study~~ when potential significant adverse traffic impacts are evident (as determined by the Ventura County PWA — Transportation Department ~~PWATD~~). The TIS ~~Traffic Impact Study~~ shall include, but is not limited to documentation which presents the proposed projects potential to result in VMT exceeding the thresholds of significance ~~set~~ identified in Table 1: Vehicle Miles Traveled (VMT) Thresholds of Significance Criteria of this section. If a proposed project is found to have a significant impact on VMT, the TIS shall include a list and description of improvements (or mitigation measures) that reduce the impact, as feasible, by modifying the project's VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes). VMT calculations shall include the effect of any mitigation measures,

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~~the approximate cost and tentative scheduled timing of each proposed improvement and the identification of specific mitigation measures to be constructed or implemented by the applicant. This information shall include payments to be made to the Transportation Impact Mitigation Fee (TIMF) program, improvements, or other mitigation measures that are required to reduce significant adverse impacts to a less-than-significant level.~~

1. **Scope of Work** - In order to avoid disagreement as to scope and content of a TIS, the scope of work for a TIS for any project shall be submitted to and approved by the County PWATD—Transportation Department prior to commencing the work. Any TIS submitted without such prior approval is subject to rejection. A pre-approved scope of work will not normally be required for a letter style TIS. A letter style TIS or equivalent may be required, for example for a project that exceeds the VMT threshold by a very small margin (5% or less). A letter style TIS shall be no more than 4 pages in length.

~~A pre-approved scope of work will not normally be required for a letter style TIS. A letter style TIS or equivalent may be required, for example, to document that the trip generation from a proposed land use is less than the existing use or to analyze the impacts of a single peak-hour trip generated by the addition of a single family home on a lot created by a lot split. The letter style study should be no more than four pages and provide trip generation and distribution information. It should analyze impacts only to the critical road segments or intersections within the study area.~~

2. **Typical Content of Traffic Impact Studies (TIS):**

- a. Executive Summary - This should be no more than two pages summarizing the project's traffic impacts ~~(project and cumulative)~~ based on the VMT County's threshold criteria, calculation of TIMF and, if necessary, a listing of needed road improvements and/or proposed changes in the project to mitigate the traffic impacts.
- b. Maps showing the following:
 - Location of proposed project and site plan, if available.
 - Collectors, arterial and State highways that are likely to be used by occupants and visitors.
 - Location of other pending projects requiring General Plan Amendments (GPA) or Zone Changes (ZC) that cumulatively impact those roads included in the study area, the status of those projects (Permits Plus System of the Planning Division of the Resource Management Agency [RMA] unless otherwise approved by the Director of PWA—Transportation Department.). The list of pending projects would be as of the date of issuance of the Notice of Preparation of the environmental document or approval of the TIS scope of work.
 - ~~Distribution of traffic from the proposed project and other projects involving a GPA or ZC will be accomplished by breaking down trips from the site into percentages based on quantifiable data. Trip distribution shall be provided for all transportation corridors anticipated carrying five percent or more of site generated traffic but in no case, less than one trip. Information for the other project sites will use the previously approved traffic impact studies for those projects when available.~~
 - ~~The traffic carrying capacity of most of the roads in the regional road network is extremely limited. Moreover, the policies contained in General Plan Policy 4.2.2-4 regarding discretionary projects in the unincorporated area are very restrictive. Several roads or intersections within the Ventura County Regional Road Network are already at or below the LOS prescribed by the General Plan. It is acknowledged that~~

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~~statistical splitting and distribution of traffic trips is a common practice when performing traffic impact studies. This practice is generally applicable for projects which generate relatively large numbers of trips (at least 100 ADTs or greater). Applying statistical trip splitting percentages to traffic generation volumes of extremely low volume trip generation rates, results in a less than credible analysis. For this reason, fractionalization of one single peak hour trip will not be permitted for TISs. For example, if a single trip can be assigned to the street network in multiple directions based on existing land use, population or traffic volume data, this trip shall be assigned as a whole trip to the street that has the highest probability of being used as the primary travel route during peak hours.~~

- ~~• Trip assignment to roads included in the study area, existing traffic, existing, plus project traffic, existing plus project plus cumulative traffic (ADT and PHT) based on quantifiable data. Cumulative traffic, except for GPAs and ZCs, can be assumed to be the projected traffic analysis contained in the Final Subsequent EIR for the 2005 General Plan Update, which can be found on the Planning Division's website.~~
- ~~• To determine traffic impacts from an existing illegal use that is applying for a permit to legalize its use, the traffic from generated by the illegal use will be considered new traffic unless the applicant can document that the illegal use was in continuous existence prior 1985. This is the year the baseline data for the Countywide traffic model was collected for the purpose of developing traffic projections upon which the County's traffic mitigation fee program was initially based*~~
- ~~• *Based on the Planning Director's Policy Interpretations Regarding Traffic Impact Assessments and the Traffic Mitigation Fee Ordinance memo, dated November 1, 1994.~~

c. Tables, charts, or other written calculations showing the following:

- ~~1) Proposed project and other projects, their size and nature, trip generation (ADT and VMT caluclations-PHT), and status shall be provided.~~
- ~~2) For road segments, signalized and potential signalized intersections, LOS calculations shall be provided for traffic associated with the following:~~
 - ~~• Existing development~~
 - ~~• Existing development, plus project~~
 - ~~• Cumulative traffic without project~~
 - ~~• Cumulative traffic, plus project~~

~~The LOS for signalized intersections shall be based on the Intersection Capacity Utilization (ICU) method and the service flow rates adopted by the Ventura County Transportation Commission for the Congestion Management Plan. The cumulative analysis should include all approved un-built projects and all other pending approval projects or build out of the land uses in the County's General Plan in the study area. The latter method will be required for projects involving a General Plan Amendment. The list of pending projects would be as of the date of issuance of the Notice of Preparation of the environmental document or approval of the TIS scope of work.~~

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- 3) The location of operational as well as safety problems, project specific, and cumulative impacts after implementation of funded mitigation measures shall be identified. A traffic signal warrants analysis (or analysis of other traffic control measures) shall be attached where appropriate.
 - 4) A list and description of improvements (or mitigation measures) needed to correct the identified deficiencies, segregated by project impacts ~~and cumulative impacts~~ shall be provided. ~~LOS calculations shall include the effect of any mitigation measures, the approximate cost and tentative scheduled timing of each proposed improvement and the identification of specific mitigation measures to be constructed or implemented by the applicant.~~ This information shall include payments to be made to the TIMF program, frontage improvements (e.g., sidewalks, curbs and gutters), or other mitigation measures that are required to reduce significant adverse impacts to a less-than-significant level.
- d. Narrative, Footnotes, and Appendices containing the following:
- 1) Sources of data, including persons contacted and dates of contact
 - ~~2) Raw traffic count data (traffic counts should be less than two years old)~~
 - 3) Assumptions made, methods used and special circumstances
 - ~~4) LOS calculations:~~
 - ~~• Peak hour turning movements and LOS (show Volume/Capacity ratios for the scenarios described in Section c2)~~
 - ~~• Lane configuration and traffic control~~
 - ~~Effect of proposed mitigation measures on LOS~~
- ~~Additional traffic impact analysis may be required in special circumstances such as:~~
- ~~• Summer weekend activity in recreational areas~~
 - ~~• University/school graduation ceremonies or events~~
 - ~~• Holidays or special events~~
 - ~~• Swing shifts~~
 - ~~• Developments with special visitor, employee, or shopping hours or days (e.g., weekends)~~
 - ~~• Unsignalized intersections~~
 - ~~• Other special circumstances determined by the Director of the County PWA Transportation Department or his/her designee~~

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Appendix A

Vehicle Miles Traveled Estimation

This memorandum summarizes the regulatory context pertaining to Vehicle Miles Traveled (VMT) analysis requirements under CEQA, and provides more detailed technical information of the technical approach and parameters used to estimate baseline and future VMT reported in the County 2040 General Plan Environmental Impact Report (EIR).

Regulatory Changes under CEQA: VMT

Recent regulatory changes to CEQA requirements under SB 743 now require transportation impacts to be analyzed using VMT as a metric. Passed in 2013, Senate Bill (SB) 743 required the Governor's Office of Planning and Research (OPR) to develop new CEQA guidelines that address transportation impact metrics under CEQA. Section 15064.3 was added to the State CEQA Guidelines effective December 28, 2018 as part of a comprehensive guidelines update. The guidelines address the determination of significance for transportation impacts under CEQA, requiring transportation impact analysis be based on VMT instead of a congestion metric (such as LOS) and states that a project's effect on automobile delay shall not constitute a significant environmental impact as previously required. While some jurisdictions may choose to retain LOS standards as a project's condition of approval, CEQA impacts or mitigations will no longer be based on LOS changes.

OPR published its proposal for the comprehensive updates to the CEQA Guidelines in November 2017 which included proposed updates related to analyzing transportation impacts, pursuant to Senate Bill 743. The updates indicated that VMT be the primary metric used to identify transportation impacts. In December of 2018, OPR published the most recent version of the Technical Advisory on Evaluating Transportation Impacts (December 2018) which provides guidance for VMT analysis. The Office of Administrative Law approved the updated CEQA Guidelines and lead agencies have an opt-in period until July 1, 2020 to implement the updated guidelines.

VMT was chosen as the primary metric to better integrate land use and multimodal transportation choices, to encourage alternative transportation, greater efficiency, and reduced GHG emissions. The most recent technical guidance on analyzing the transportation impacts under CEQA released by OPR in December of 2018 provides technical recommendations regarding assessment of VMT, thresholds of significance and mitigation measures. OPR (2018) offers a generalized recommendation of a 15 percent reduction below existing VMT as a threshold of CEQA significance. Trip- or tour-based based VMT

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analysis is recommended over boundary-based VMT analysis as the established and most appropriate methodology for analyzing VMT impacts under CEQA. Trip-based assessment of VMT captures the full extent of the vehicle trip length – even the portion that extends beyond the jurisdictional boundary. VMT impacts are assessed by quantifying trips to or from a jurisdiction, which start or end within the jurisdiction. Conversely, a boundary-based assessment of VMT impacts is quantified by the length of the vehicle trips that occur within the boundaries of a jurisdiction.

As noted in the updated guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The guidance provided thus far relative to VMT significance criteria is focused on residential, office, and retail uses. For rural land uses, OPR guidance states that fewer options may be available for reducing VMT for projects in rural areas outside of a metropolitan planning organization and significance thresholds may be best determined on a case-by-case basis. Ventura County plans to adopt formal thresholds of significance under SB 743 prior to the July 1, 2020 deadline. In lieu of formally adopted thresholds of significance, VMT thresholds consistent with OPR's final technical guidance for the analysis of transportation impacts under CEQA were applied in the analysis presented in the 2040 Ventura County General Plan EIR.

VMT Analysis: Methodological Approach

An integral step in the VMT analysis utilized to assess transportation impacts under CEQA is establishing baseline and forecasted VMT estimates for use in comparison against an established threshold to identify a significant impact. This information is presented in the Draft EIR of Ventura County's 2040 General Plan, and is described with more specific technical detail herein.

Description of Model Scenarios

In order to generate the baseline and future change in VMT per capita and net VMT resulting from the proposed 2040 General Plan, the recently updated Ventura County Transportation Commission (VCTC) countywide Travel Demand Model was used. The VCTC Travel Demand Model (TDM) uses the Caliper Trans Cad model development and operating software environment for all model components.

As part of the 2040 General Plan, the following two model scenarios were developed:

- 2012 Baseline Model – reflects the most recent validated baseline for Ventura County (i.e., existing land use and transportation network); and,
- 2040 Ventura County General Plan Land Use Model – this reflects the land use growth assumptions in the proposed Ventura County 2040 General Plan for the unincorporated areas and the Southern California Association of Government's (SCAG) 2016 Sustainable Communities Strategy (SCS) land use within the incorporated areas. The transportation network reflects all currently programmed transportation improvement infrastructure projects.

The source of the baseline and future 2040 land use of the VCTC model is from SCAG's 2016 Regional Transportation Plan and Sustainable Community Strategy. The land use within the unincorporated areas of Ventura County were reviewed by County staff for accuracy. Given that model traffic analysis zones

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(TAZs) are not coterminous with local political boundaries, the following steps were taken by VCTC to properly allocate the future land use growth associated with the 2040 General Plan for use within the model scenarios:

1. A reasonableness check was performed on the TAZ data originally provided by SCAG and land use corrections were made to TAZs where appropriate. These corrections were largely made within cities since SCAG worked closely with the County to initially establish their growth projections;
2. The County provided VCTC with unincorporated county population projections for 2020 and 2040 for the 2040 General Plan. These projections were used as a guide to refine the TAZ allocation by attempting to minimize the gap between the County and City numbers and total population by jurisdiction from the model's land use to socio-economic data model output.
3. TAZ adjustments were performed through an iterative process. On first pass, a 51 percent rule and local knowledge of development patterns (i.e. East Area 1 development to Santa Paula) was used to allocate growth between shared border TAZs. This provided a fair means for allocating the vast majority city-county border TAZs.
4. Based on the information in Step 3, several individual TAZ adjustments were made in edge cases (notably in Oxnard and Camarillo).

Baseline VMT Estimates

A road inventory was provided in the Background Report based on information sourced from the Highway Performance Monitoring System (HPMS) using 2014 data. For the analysis presented in the Draft EIR, 2016 HPMS data was used to provide the "ground truth" boundary-based VMT estimate sourced from Caltrans Public Road Data. As shown in **Table K-1**, the countywide VMT estimate for Ventura County is 18,676,660. VMT occurring on local roadways in incorporated and unincorporated areas are reported by HPMS as 6,689,160 and 1,394,030, respectively. HPMS data reports state highway system (SHS) VMT separately; however, it does not explicitly distinguish between incorporated versus unincorporated area VMT occurring on the state highway system of the county.

To distinguish between incorporated and unincorporated area VMT occurring on state highways, the 2016 Caltrans Post-Mile based State Highway Volume Report was used to estimate the amount of state highway VMT occurring within unincorporated Ventura County. This was calculated by estimating the segment lengths between post-mile points and multiplying these lengths by the Average Daily Volume (ADT) reported in the Caltrans Volume Report (VMT = segment length x volume). This estimation resulted in an unincorporated state highway baseline VMT estimate of 3,519,851. The latter can then be added to the HPMS VMT estimates for local and other unincorporated roadways to yield the total boundary-based unincorporated Ventura County VMT estimate of 4,936,831. Incorporated and countywide VMT estimates were reported as reasonableness checks on the calculations performed to achieve the results displayed in **Table 2.1**.

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Table K-1 2016 Ventura County Boundary-Based VMT Estimates

Total Countywide VMT (HPMS Boundary-based)	18,676,660
Unincorporated County Local Road VMT (HPMS Boundary-based)	1,394,030
Unincorporated County State Highway VMT (Caltrans ADT x SHS Miles)	3,519,851
Other Unincorporated VMT (HPMS Boundary-based)	22,950
Total Unincorporated VMT (HPMS Boundary-based + SHS estimate)	4,936,831
Total Incorporated Local Road VMT (HPMS Boundary-based)	6,689,160
Total Incorporated State Highway VMT (Caltrans ADT x SHS Miles)	7,037,589
Other Incorporated VMT (HPMS Boundary-based)	13,080
Total Incorporated VMT (HPMS Boundary-based + SHS estimate)	13,739,829

Source: 2016 HPMS (Caltrans, 2017), GHD via 2017 Caltrans Volume Report

The VMT estimates reported by HPMS do not reflect the full trip length of trips that cross jurisdictional boundaries (i.e., trip-based VMT). Pursuant to OPR guidance, and as described previously, full trip-length VMT estimates are preferred over boundary-based VMT for estimating greenhouse gas emissions from on-road mobile sources.

To reflect the full trip length of those trips that have one trip end (either beginning or ending) in Ventura County), VCTC and Santa Barbara County Association of Governments (SBCAG) travel demand model outputs were used to augment the amount of internal boundary-based VMT occurring with Ventura County. This entails estimating the amount of VMT that occurs outside Ventura County from interregional trips (i.e., internal-to-external (I-X) trips and external-to-internal (X-I) trips) occurring south and east of Ventura County. Given that the SBCAG regional travel demand model includes Ventura County in its modeling domain, the best approach for quantifying VMT from interregional trips north of Ventura County was to use the SBCAG model. This entailed processing similar output (i.e., trips with only one trip end in Ventura County) from the SBCAG model to compute interregional VMT between Santa Barbara County and Ventura County. For counties south and east of Ventura County, the VCTC travel demand model was used.

As shown in **Table K-2**, the added VMT that occurs outside Ventura County from interregional trips is 9,697,737 (7,880,729 VMT from areas south and east of Ventura County plus 1,817,008 from areas north of Ventura County). Based on the HPMS data and unincorporated area state highway VMT, approximately 26.4 percent of total boundary-based VMT occurs in the unincorporated areas of Ventura County. This same percentage split was applied to the total added intercountry VMT estimate to yield the unincorporated portion of VMT that occurs outside Ventura County (2,563,418 VMT). Adding this increment of VMT to the total unincorporated boundary-based VMT estimate of 4,936,831 yields the total trip-based (i.e., full trip length) VMT estimate of 7,500,249 associated with unincorporated Ventura County. **Table K-2** displays this information.

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Table K-2 2016 Ventura County Trip-Based VMT Estimates (Baseline)

<u>Interregional VMT occurring south and east of Ventura County</u>	<u>7,880,729</u>
<u>Interregional VMT occurring north of Ventura County</u>	<u>1,817,008</u>
<u>% of Unincorporated Boundary-based VMT</u>	<u>26.40%</u>
<u>Total Unincorporated Boundary-based VMT</u>	<u>4,936,831</u>
<u>Total Unincorporated Interregional VMT</u>	<u>2,563,418</u>
<u>Total Unincorporated Trip-Based VMT</u>	<u>7,500,249</u>
<u>Total Countywide Trip-Based VMT</u>	<u>28,377,397</u>

Source: VCTC 2012 Baseline Model, SBCAG 2015 Baseline Model

Forecasted VMT Estimates

A similar methodology was used to forecast future VMT as the approach used to estimate baseline VMT. Table K-3 displays the 2040 projections of boundary-based VMT within Ventura County. Based on the 2040 VCTC and 2040 SBCAG travel demand model forecasts and the percentage distribution of boundary-based unincorporated VMT, the amount of trip-based VMT associated with the unincorporated Ventura County is 8,173,937 per day.

Table K-3 Ventura County Daily VMT Estimates (2040 Forecast)

<u>Total Unincorporated Boundary-based VMT</u>	<u>5,337,751</u>
<u>Total Incorporated Boundary-based VMT</u>	<u>14,855,640</u>
<u>Interregional VMT occurring south and east of Ventura County</u>	<u>8,700,996</u>
<u>Interregional VMT occurring north of Ventura County</u>	<u>2,042,133</u>
<u>% of Unincorporated Boundary-based VMT</u>	<u>26.40%</u>
<u>Total Unincorporated Interregional VMT</u>	<u>2,836,186</u>
<u>Total Unincorporated Trip-Based VMT</u>	<u>8,173,937</u>
<u>Total Countywide Trip-Based VMT</u>	<u>30,936,520</u>

Source: VCTC 2040 Model, SBCAG 2040 Model, 2016 HPMS, GHD via 2017 Caltrans Volume Report