



To: Doug Spondello, AICP From: Daryl Zerfass and Maria Morris

Stantec

Community Development Department

City of Moorpark

File: 2042614012 Date: March 31, 2022

Reference: Pentair Warehouse Building Project VMT Analysis

Stantec Consulting Service Inc. (Stantec) has prepared a Vehicle Miles of Travel (VMT) analysis for the Pentair Warehouse Building (Project) located on APN 511-0-200-265 east of the existing Pentair site and north of Los Angeles Avenue (State Route 118) City of Moorpark, California. This memorandum summarizes the findings the VMT analysis.

Project Description

The Project consists of the construction of a 90,566 square feet industrial building directly east of the existing Pentair facility. Based on the project statistics, 4,000 SF would be office space and 86,566 SF would be warehouse. The Project Site is currently vacant. **Figure 1** shows the Project Location Map. **Figure 2** shows the Project's Site Plan.

VMT Analysis Methodology and Performance Criteria

This VMT analysis complies with the updated California Environmental Quality Act (CEQA) guidelines that incorporates the requirements of Senate Bill 743 (SB 743). Generally, SB 743 moves away from using delay-based level of service (LOS) as the metric for identifying a project's significant impact to instead use VMT.

SB 743 requires the Governor's Office of Planning and Research (OPR) to establish recommendations for identifying and mitigating transportation impacts within CEQA, the document is referred to in this memorandum as OPR's Technical Advisory¹. OPR's Technical Advisory recommends methodologies for quantifying VMT, significance thresholds for identifying a transportation impact, and screening criteria to quickly identify if a Project can be presumed to have a less than significant impact without conducting a full VMT analysis. Lead agencies are to adopt local guidelines appropriate for their jurisdiction. At the time of this analysis, the City of Moorpark has not formally adopted VMT guidelines. The County of Ventura released an Update to Section 27A(1) Transportation and Circulation Section of the Initial Study Assessment Guidelines, which includes VMT Analysis thresholds², however does not include a screening criteria. This VMT analysis has been prepared in accordance with OPR's Technical Advisory guidance, Ventura County's VMT thresholds, and discussions with City staff. The significance threshold utilized in this analysis is summarized in **Table 1**.

¹ Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, State of California, December 2018.

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² Proposed Update to Section 27A(1) Transportation & Circulation Section of the Initial Study Assessment Guidelines, Ventura County. https://s29422.pcdn.co/wp-content/uploads/2020/06/VMT-Draft-for-Public-Review-Clean-Version.pdf

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Table 1 VMT Significance Threshold

Land Use Type	Metric	Threshold of Significance		
Office and Industrial	Work-based VMT per employee	15% less than existing citywide average work-based		
development		VMT per employee		
Sources: OPR's Technical Advisory, Ventura County VMT Guidelines, and discussions with City staff.				

This Project is evaluated as an office and industrial project and work-based VMT per employee is the metric. The Project VMT rate is compared to the citywide average VMT rate minus 15 percent. If the Project VMT rate is greater than the significance threshold, the Project results in a significant impact and mitigation to reduce VMT would be necessary.

Project Screening

Prior to undertaking a project-level VMT analysis, OPR's Technical Advisory recommends applying a screening criteria. If a project satisfies one or more of the screening criteria, the project could be presumed to have a less-than-significant impact. **Table 2** summarizes the applicable screening categories. As shown, the Project does not meet any of these screening criteria.

Table 2 Project Screening Criteria and Threshold

Category	Criteria/Screening	Threshold	Project meet criteria?
CEQA Exemption	Any project that is exempt from CEQA is not required to conduct a VMT analysis.	None	No
Small Project	Small Projects can be screened out from completing a full VMT analysis.	If the Project generates less than 110 trips per day, the Project is assumed to have a less than significant impact.	No – a traffic study for the Project was prepared by Stantec in 2021. The traffic study determined that the Project would generate 238 average daily trips.
Transit Priority Area Screening	Projects within ½ mile of a major transit stop or a stop located along a high-quality transit corridor generally reduce VMT and therefore can be screened out from completing a full VMT analysis.	If the Project is within ½ mile of a major or high-quality transit stop/corridor ¹ , the Project is assumed to have a less than significant impact. The project should generally meet additional criteria related to FAR and plan consistency.	No
Low VMT Area Screening	Residential and employment- generating projects that are located in areas with low VMT and that are similar in character to the existing development can be screened out from completing a full VMT analysis.	If the Project is in a low VMT area the Project is assumed to have a less than significant impact. A low VMT area is defined as Traffic Analysis Zones that have existing home-based or home-based work VMT per capita that is 85% or less of the existing citywide or countywide average	No – Using data from the Ventura County Transportation Model, the Project is not located in a low VMT area.

FAR = Floor Area Ratio; SCS = Sustainable Community Strategy; Sources: OPR's Technical Advisory

¹ A major transit stop is defined as the intersection of two or more major bus routes with a frequency service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor is defined as an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

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Project VMT Analysis

A project-level VMT analysis was conducted with VMT statistics from the Ventura County Transportation Model³ (VCTM). As shown in **Table 3**, the Project is located in traffic analysis zone (TAZ) 60123101 and the corresponding work-based VMT in that TAZ is 23.66 VMT per employee. Since the proposed Project land use is similar to the existing land use in the TAZ, the Project can be expected to exhibit the same trip making characteristics and the Project VMT rate would be the consistent with the existing TAZ VMT rate. The citywide average work-based VMT is 23.13 per employee and, based on County guidelines, a 15 percent reduction is applied to establish the threshold of significance for CEQA analysis, which equates to 19.66 work-based VMT per employee. Therefore, the Project would be slightly above the citywide average but would require a 16.9 percent VMT reduction to be less than the threshold of significance.

Description Work-based VMT per employee TAZ 60123101 (Project TAZ) 23.66 Moorpark Citywide Average 23.13 Moorpark Citywide Average with 15% Reduction (Threshold 19.66 of Significance for CEQA) Difference 4.00 Reduction needed 16.91% **Significant Impact** <u>Yes</u> Source: VCTM 2016 SB 743 Spreadsheet, VCTC.

Table 3 Project VMT Impact Summary

VMT Reduction Strategies

The California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhous Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity⁴ (referred to here as GHG Handbook) provides substantial evidence that various commuter trip reduction measures can reduce VMT. Presented below is a measure that is appropriate for the Project and could avoid or substantially reduce the Project's significant impact.

MM-1: The Project will provide an employer-sponsored vanpool (CAPCOA T-11). At a minimum 12 percent of employees will need to participate in the vanpool program. The Project will implement the program and costs for the employer could include the vehicles, labor costs of the driver, and other incentives for employee participation. The Project could select to implement this measure or other equivalent commuter trip reduction measure(s) that would achieve a similar VMT reduction.

Commuters who participate in vanpool programs usually travel longer distances to get to work. The mode shift from single-occupancy vehicle that travel long distances to a shared vehicle reduces commute VMT. To

³ 2016 SB 743 Spreadsheet Ventura County Transportation Model, Ventura County Transportation Commission, https://www.goventura.org/work-with-vctc/traffic-model/.

⁴ Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association, December 2021.

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estimate the Project's potential VMT reduction with this measure, the formula from strategy T-11 in CAPCOA is used⁵ and results in a 16.93 percent reduction in commute VMT⁶. The following assumptions include:

- 12 percent of employees will participate in the vanpool program
- average length of one-way vehicle commute trip in Ventura County is 12.7 miles
- average length of one-way vanpool commute trip is 25 miles per trip
- vanpool occupancy is 5

A minimum of 12 percent of employee participation is needed to reduce VMT rate to a level below the threshold. The average length of one-way vehicle commute trip in Ventura County is estimated using aggregated weekday trip length data for work/school location in "Oxnard-Thousand Oaks-Ventura" Core-Based Statistical Area for the dates between March 2021 – May 2021 (See Attachment A). The average length of one-way vanpool commute trip is 25 miles and represents an approximate distance to/from the San Fernando Valley and Santa Clarita Valley. Lastly, CAPCOA notes that a vanpool typically carries between 5 to 15 people. This analysis assumes a conservative 5 occupants per vehicle.

A VMT reduction of 16.91 percent is needed to reduce the Project VMT rate to a less than significant level. **Table 4** summarizes the resulting Project VMT rate with the commute trip reduction measure.

Description	Work-based VMT per employee
Project VMT rate	23.66
Mitigation (vanpool) reduction	-16.93%
Project with mitigation	19.65
Moorpark Citywide Average with 15% Reduction	
(Threshold of Significance for CEQA)	19.66
Is Project above or below Citywide Threshold?	Below
Significant Impact with mitigation?	No

Table 4 Project VMT Summary with Mitigation

As shown in **Table 4**, the Project would have a less than significant impact on VMT with the mitigation measure.

Cumulative VMT Analysis

The City of Moorpark is currently updating their General Plan. While the General Plan was last updated in 1992, revisions to the General Plan Map have been made as recent as October 2020. The Project site is zoned for I-2 Medium Industrial. The Medium Industrial land use is described as light manufacturing, processing, fabrication, and other non-hazardous industrial uses. The Project land use corresponds with this description and is therefore consistent the General Plan. Since the Project is consistent with the General Plan, it would also be consistent with Connect SoCal, the long-range Regional Transportation Plan and

⁵ % Change in VMT = (((1- employee participation %) x (average length of one-way vehicle commute trip in region)) + (employee participation %) x (average length of one-way vanpool commute trip/average vanpool occupancy))) ÷ (((1- employee participation %) x (average length of one-way vehicle commute trip in region)) + (average length of one-way commute trip in region x average vanpool commute trip))) - 1

⁶ (((1-12%) x (12.7 miles per trip)) + (12% x (25 miles per trip/5 occupants))) ÷ (((1-12%) x (12.7 miles per trip)) + (12.7 miles per trip x 25 miles per trip)) - 1 = -16.93% reduction in commute VMT

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Sustainable Communities Strategy (RTP/SCS) for the Southern California Association of Governments (SCAG) region.

According to OPR's Technical Advisory⁷, when a project has a less than significant impact at the project level, the project would not have a cumulative impact. Since the Project was found to have a less than significant impact, the Project would also have a less than significant cumulative impact.

Active Transportation

Since the Project is located in a sparsely developed, primarily agricultural area of the city, pedestrian sidewalks are not present near the Project Site. However, A Class III bikeway, otherwise known as an onstreet route for bicyclists that is shared with motorists, is designated adjacent to the Project Site on Los Angeles Avenue. Los Angeles Avenue can be used to further access the network of bicycle facilities within the city. The Project would not block, remove, or create barriers for pedestrians or bicyclists.

Transit

Moorpark City Transit (MCT) operates bus lines within the city and specifically operates two weekday routes (Route 1 and Route 2), both of which stop approximately ¾ of a mile east of the Project site near the intersection of Tierra Rejada Road and Courtney Lane. These routes connect to public facilities and shopping. Routes 1 and 2 also stop at the Moorpark Metrolink Station, which additionally provides a connection to VCTC Routes 77 and 70-73X. MCT does not operate lines on weekends or City holidays. The Project would not block, remove, or create barriers for transit utilization.

Conclusion

A VMT analysis was conducted for the Project. The Project does not meet any of the screening criteria recommended in OPR's Technical Advisory. A project-level VMT impact analysis was conducted using VMT statistics from VCTM. The Project VMT rate is 23.66 VMT per employee. The citywide average work-based VMT is 23.13 per employee and based on County guidelines a 15 percent reduction is applied to establish the threshold of significance for CEQA analysis, which equates to 19.66 work-based VMT per employee. The Project would be slightly above the citywide average but would require a 16.9 percent VMT reduction to be less than the threshold of significance. Implementation of an employer-sponsored vanpool program would reduce VMT by approximately 16.93percent and would reduce the Project VMT rate to a less than significant level (19.65 VMT per employee).

Since the Project is found to have a less than significant impact at the project-level, the Project would also have a less than significant cumulative impact since it is consistent with the current RTP/SCS. Lastly, the Project would not block, remove, or create barriers for pedestrians, bicyclists, or transit.

⁷ Page 6 from Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, State of California, December 2018.

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If you have any questions on the above material, please feel free to contact Daryl or Maria to discuss.

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Attachments: Figure 1 Project Location Map

Figure 2 Project Site Plan

Attachment A: Average Length of One-Way Commute Trip in Ventura County

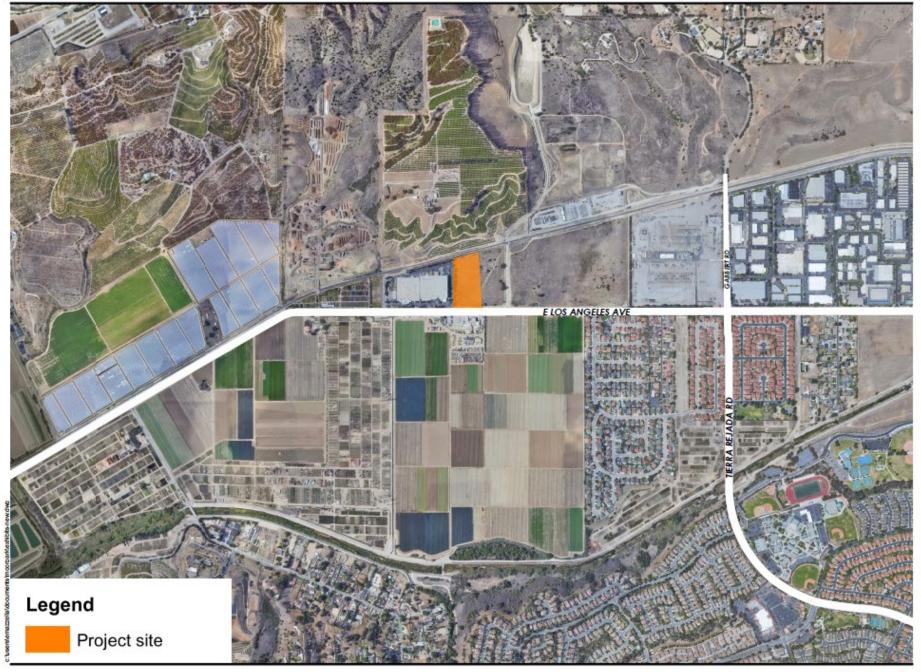
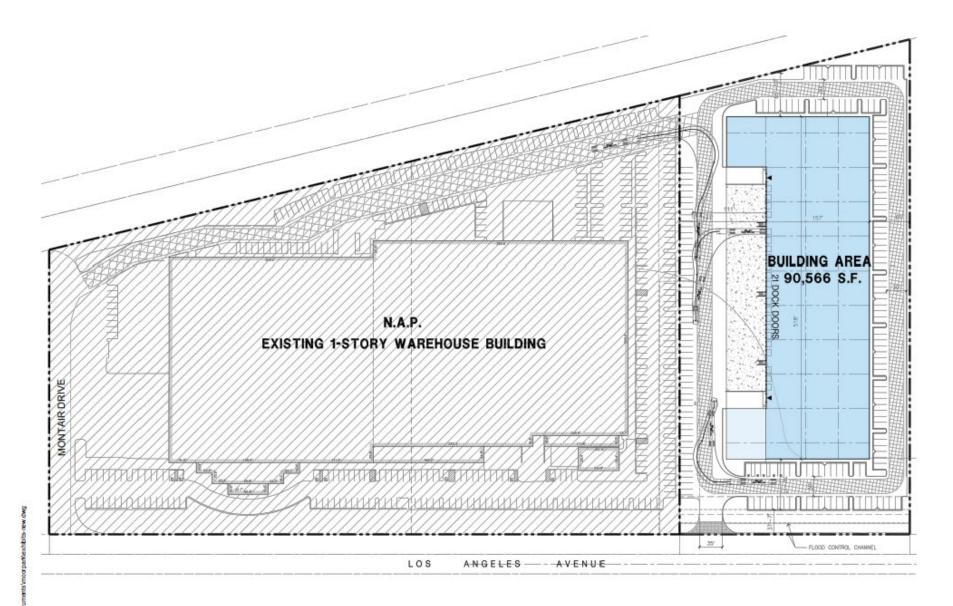






Figure 1



Source: HPA Architecture



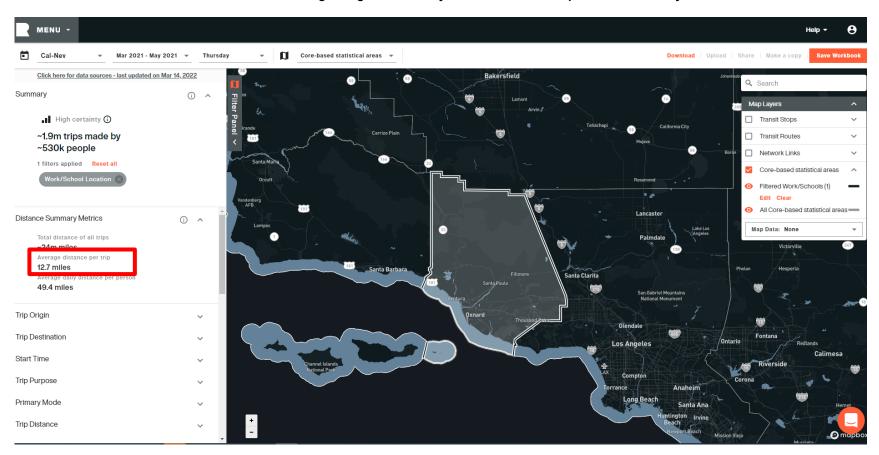


Figure 2

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Attachment A: Average Length of One-Way Vehicle Commute Trip in Ventura County



Source: https://replicahq.com/