



Appendix K

Vehicle Miles Traveled Assessment

MEMORANDUM

To: Laura Forinash
City of Agoura Hills, California

Date: May 20, 2021

From: Clare M. Look-Jaeger, P.E. *CL-J*
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LLG Engineers

LLG Ref: 1-20-4405-1

Subject: Canwood Office Campus Project – Vehicle Miles Traveled Assessment

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Linscott, Law & Greenspan, Engineers (LLG) has prepared this memorandum to summarize the vehicle miles traveled (VMT) assessment prepared for the proposed Canwood Office Campus project (“proposed project”) located in the City of Agoura Hills, California. Pursuant to the current statutory requirements of the California Environmental Quality Act (CEQA) Guidelines, a project’s transportation impact must be determined on the basis of VMT. Therefore, this memorandum provides a description of the proposed project, a discussion of the current CEQA statutes and the City of Agoura Hills’ environmental review procedures, a detailed review of the applicable VMT screening criteria contained in the City of Agoura Hills’ *Transportation Assessment Guidelines*¹, and conclusions regarding the proposed project’s VMT impacts.

In addition, the City of Agoura Hills also requires a local transportation analysis in order to assess the proposed project’s consistency with the City’s General Plan policies and goals for purposes outside of CEQA. The study area, methodology, and conclusions for the local transportation assessment is summarized separately in the “Canwood Office Campus Project Local Transportation Impact Analysis,” prepared by Linscott, Law & Greenspan, Engineers in May 2021.

PROJECT DESCRIPTION

Existing Site

The proposed project site is located at 29555 Canwood Street in the City of Agoura Hills, California. The project site, which is currently undeveloped, is generally bounded by the existing Los Angeles County Fire Department Fire Station 89 to the west, existing office development to the east, undeveloped land to the north, and Canwood Street to the south. The project site and general vicinity are shown in *Figure 1*.

Description of Proposed Project

The proposed project consists of the planned development of five (5) buildings that would provide a total of 21,100 square feet of office space. Based on information

¹ *Transportation Assessment Guidelines*, City of Agoura Hills, July 2020.

provided by the project Applicant, the proposed project is currently planned to consist of a mix of medical office and general office space. The final land use mix square footages presently are not defined, but would range between the following two options:

- Option 1: 21,100 square feet of medical office building space (MOB)
- Option 2: 11,000 square feet of general office (GO) and 10,100 square feet of MOB

A total of 110 parking spaces is planned to be provided at the site, consisting of 105 standard parking spaces and five (5) handicap accessible parking spaces. Vehicular access to the project site will be accommodated by a single project driveway located on the north side of Canwood Street. Pedestrian and bicycle access to the site will be accommodated by an Americans with Disabilities Act (ADA) compliant pathway which connects to the existing public sidewalk and street system in the vicinity of the site. The proposed site plan is illustrated in *Figure 2*.

VEHICLE MILES TRAVELED ASSESSMENT

Regulatory Framework

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743 (Steinberg, 2013). Among other things, SB 743 created a process to change the methodology to analyze transportation impacts under CEQA (Public Resources Code Section 21000 and following) in order to promote 1) the reduction of greenhouse gas emissions, 2) the development of multimodal transportation networks, and 3) a diversity of land uses. On December 30, 2013, the State of California Governor's Office of Planning and Research (OPR) released a preliminary evaluation of alternative methods of transportation analysis, which included analysis based on project VMT rather than impacts to intersection Level of Service. OPR issued other draft discussion documents in March 2015 and January 2016, suggesting new revisions to the CEQA Guidelines. Concurrently, OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA*² ("*Technical Advisory*"), which provides non-binding recommendations on the implementation of VMT methodology and which has significantly informed the way VMT analyses are conducted in the State. In November 2017, OPR submitted the proposed amendments to the CEQA Guidelines to the State's Natural Resources Agency (including the proposed new Guidelines Section 15064.3 which governs how analyses of potential traffic impacts should be conducted). On January 26, 2018, the Natural Resources Agency published a Notice

² *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Governor's Office of Planning and Research, December 2018.

of Rulemaking, commencing the formal rulemaking process for the amendments to the CEQA Guidelines. On December 28, 2018, the California Office of Administrative Law adopted the proposed amendments, formally implementing the use of VMT as the metric for transportation analysis under CEQA. State-wide implementation of the new metric was required by July 1, 2020.

In compliance with Senate Bill 743 and CEQA, the City of Agoura Hills has developed a methodology for evaluating transportation impacts based on VMT for land use projects which is consistent with the recommendations provided by OPR in the *Technical Advisory*. The City has prepared the *Transportation Assessment Guidelines* (“Guidelines”) which sets forth the screening criteria, thresholds of significance, and analysis methodology for evaluating the VMT impacts of land use development projects in the City of Agoura Hills. The City’s adopted methodology is consistent with the recommendations provided by OPR in the current *Technical Advisory* released in December 2018.

The California State Department of Transportation (Caltrans) has also formally adopted VMT as the metric for evaluating the transportation impacts of local development projects on the State Highway System, which includes the US-101 Freeway which is in the vicinity of the project site. Caltrans’ *Transportation Impact Study Guide*³ (TISG) references the December 2018 *Technical Advisory* prepared by the OPR as the basis for its guidance on VMT assessment. For the purpose of this transportation assessment, it is understood that the City of Agoura Hills’ adopted VMT methodology and criteria are consistent with the recommendations provided by OPR in the *Technical Advisory* and thus satisfy Caltrans’ VMT analysis requirements as well. Therefore, no separate VMT analysis has been prepared for Caltrans’ review of the proposed project.

Vehicle Miles Traveled Screening Criteria

Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. Consistent with the recommendations provided by OPR in the *Technical Advisory*, the City’s Guidelines recognize a number of screening criteria which may be applied to screen proposed projects out of detailed VMT analysis. These criteria are generally based on a project’s size or land use type. Proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. As presented in the City’s Guidelines, the purpose of screening is to determine if a presumption of less than significant

³ *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*, Caltrans, May 20, 2020.

transportation impacts can be made on the facts of the project. Projects which are not screened out would be required to conduct a formal VMT analysis in order to determine the significance of project impacts. The following excerpt of the City of Agoura Hills’s *Transportation Assessment Guidelines* presents the VMT screening criteria.

TABLE 1. SCREENING CRITERIA FOR VMT ANALYSIS

Screening Criteria	OPR Guidance
SMALL PROJECTS¹	<p>Expected to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> ▪ Project generation is less than 110 trips per day <p>CEQA VMT analysis required if: It is inconsistent with the SCAG Regional Transportation Plan/Sustainable Communities Strategy in terms of development location, density, and intensity.</p>
LOCAL-SERVING RETAIL¹	<p>Expected to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> • No single store on-site exceeds 50,000 square feet of gross floor area <p>CEQA VMT analysis required if: A single store exceeds 50,000 square feet of gross floor area.</p>
LOCAL ESSENTIAL SERVICE²	<p>Expected to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> • Day care center ▪ Public K-12 School ▪ Police or Fire stations ▪ Medical/Dental office building ▪ Government offices (in-person services such as post office, library, and utilities) <p>CEQA VMT analysis required if: The nature of the service is regionally focused as determined by the City.</p>
REDEVELOPMENT PROJECTS³	<p>Expected to cause a less-than-significant impact:</p> <ul style="list-style-type: none"> ▪ Project replaces an existing VMT-generating land use and does not result in a net overall increase in VMT. <p>CEQA VMT analysis required if: Project replaces an existing VMT-generating land use and results in a net overall increase in VMT.</p>

¹ Office of Planning and Research. (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

² Based on assumption that, like local-serving retail, the addition of necessary local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their non-discretionary nature.

³ 2018 OPR Guidance, Page 18

(City of Agoura Hills Transportation Assessment Guidelines, July 2020)

Based on a review of the project's development program, size, and other pertinent factors, it was determined that the City's screening criteria may be applied to the proposed project. Specifically, the "Local Essential Service" screening criterion is applicable to the medical office space proposed as the Option 1 project and as a component of the Option 2 project, while the "Small Projects" screening criterion is applicable to the general office space proposed as a component of the Option 2 project. The following sections provide a detailed review of the application of the screening criteria to the proposed project.

Local Essential Service

The City's Guidelines state that projects which are local essential services are screened out of further VMT analysis based on the assumption that, like local-serving retail, the addition of necessary local in-person services will reduce VMT. It is assumed that trips to these locations will be made irrespective of distance given their non-discretionary nature. The *Technical Advisory* supports the local-serving retail screening criteria with the assumption that new locally serving retail development typically redistributes shopping trips rather than creating new ones. By adding retail opportunities into the urban fabric and improving retail destination proximity, locally serving retail developments tend to shorten trips and reduce VMT, and may be presumed to cause less than significant impacts. The City of Agoura Hills similarly assumes that, by improving the destination proximity for essential trips which would otherwise be made regardless of distance, local essential services will lead to shortened trips and will reduce VMT.

The City defines local essential services to include, among others, land uses such as medical and dental offices buildings. Therefore, the medical office component of the proposed project is expected to be screened out on the basis of the "Local Essential Service" screening criterion. Application of this criterion to each of the potential project options is discussed below:

- Option 1: This option assumes that the project will accommodate only medical offices, and thus the full floor area of the project (i.e., all 21,100 square feet of office space) would screen out through application of this criterion.
- Option 2: This option assumes that the project will consist of up to 10,100 square feet of medical offices. Therefore, the 10,100 square feet of medical office floor area would screen out through application of this criterion. However, the remaining project component (i.e., the proposed general office space) must still be considered under other applicable screening criteria.

Small Projects

As stated in the City’s Guidelines, a project meets the “Small Projects” screening criteria if it generates 110 or fewer daily trips. The *Technical Advisory* states that projects which generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact, and provides the following evidence for this presumption: “CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2)). Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.”

Traffic trip generation is expressed in vehicle trip ends, which are defined as one-way vehicular movements, either entering or exiting the generating land use. The traffic volumes anticipated to be generated by the proposed project over a typical 24-hour weekday period (i.e., daily) were forecast utilizing trip generation rate information provided in the Institute of Transportation Engineers’ (ITE) *Trip Generation Manual*, 10th Edition⁴. Specifically, ITE Land Use Code 710 (General Office Building) and ITE Land Use Code 720 (Medical-Dental Office Building) trip generation average rates were used to forecast the traffic volumes expected to be generated by the proposed Option 1 and Option 2 projects. While not required for the purpose of VMT screening, a forecast of the traffic volumes anticipated to be generated by the proposed project during the typical weekday AM and PM peak hours has also been prepared and included herein for consistency with the Local Transportation Impact Analysis.

The Option 1 project satisfies the “Local Essential Service” screening criterion and is therefore not required to satisfy the daily trip threshold for the “Small Projects” criterion. However, for informational purposes and for consistency with the Local Transportation Impact Analysis, the trip generation forecast for the Option 1 project is summarized in **Table 1**.

The daily trips expected to be generated by the general office component which is proposed as part of the Option 2 project is presented in **Table 2**, which summarizes the trip generation forecast for the Option 2 project as a whole. As shown in **Table 2**,

⁴ Institute of Transportation Engineers *Trip Generation Manual*, 10th Edition, Washington D.C., 2017.

the proposed 11,000 square-foot general office component is expected to generate a total of 107 trip ends (approximately 54 inbound trips and 54 outbound trips) over a 24-hour period on a typical weekday. As previously discussed, the 10,100 square-foot medical office component of the Option 2 project satisfies the “Local Essential Service” screening criterion and is therefore not required to also satisfy the daily trip threshold for the “Small Projects” criterion. Because the general office component of the Option 2 project generates fewer than 110 additional daily trips, the City of Agoura Hills’s “Small Projects” screening criteria is satisfied.

It should be noted that while the final land use mix is not currently known, based on information provided by the project Applicant it is understood that the proposed Canwood Office Campus project would, at most, accommodate up to 11,000 square feet of general office space. Should the project ultimately accommodate less than 11,000 square feet of general office space, the general office component will correspondingly generate fewer daily trips than the forecast provided in *Table 2* and the “Small Projects” criterion will continue to be satisfied.

Impact Conclusions

As stated in the City’s Guidelines, the purpose of screening is to determine if the presumption of less than significant transportation impact can be made based on the facts of the project. The medical office space proposed as the Option 1 project satisfies the City’s “Local Essential Service” screening criterion. The medical office component of the Option 2 project satisfies the City’s “Local Essential Service” screening criterion, while the general office component of the Option 2 project satisfies the City’s “Small Projects” screening criterion. It is further noted that while the final land use mix is not presently known, it is expected that the proposed project will continue to satisfy the “Local Essential Service” and “Small Projects” screening criteria as long as the general office component consists of 11,000 square feet or less and the medical office component consists of 10,100 square feet or more. Through satisfaction of these screening criteria, it is determined that the proposed Canwood Office Campus project will result in less than significant transportation impacts.

SUMMARY AND CONCLUSIONS

The proposed Canwood Office Campus project is located at 29555 Canwood Street in the City of Agoura Hills, California. The proposed project consists of the planned development of five (5) buildings that would provide a total of 21,100 square feet of office space. Based on information provided by the project Applicant, the proposed project is currently planned to consist of a mix of medical office and general office space. The final land use mix square footages presently are not defined, but would range between the following two options:

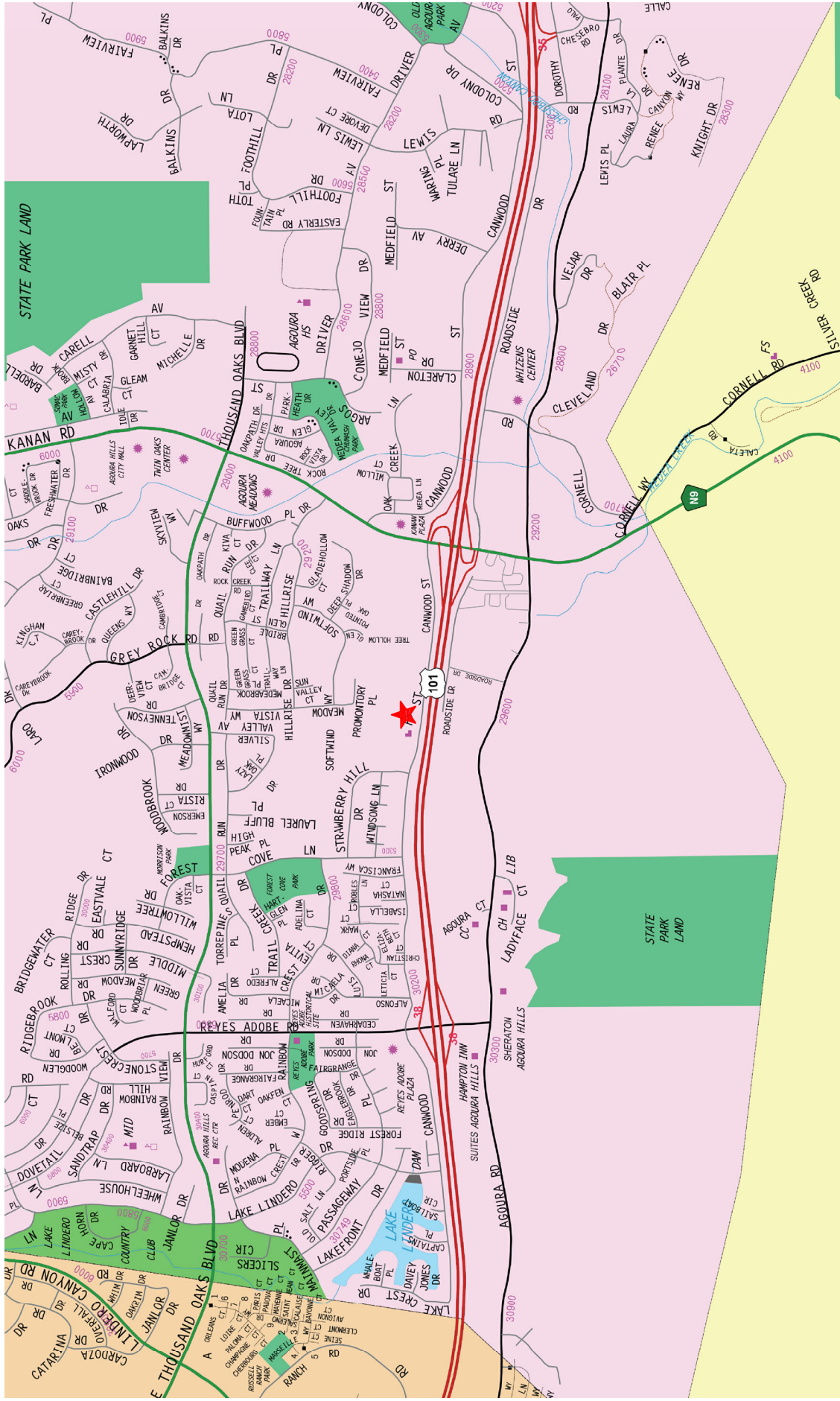
- Option 1: 21,100 square feet of medical office building space (MOB)
- Option 2: 11,000 square feet of general office (GO) and 10,100 square feet of MOB

Based on a review of the VMT screening criteria set forth in the City of Agoura Hills' *Transportation Assessment Guidelines*, it is determined that the proposed Canwood Office Campus Option 1 project satisfies the "Local Essential Service" screening criterion, while the proposed Option 2 project satisfies the "Local Essential Service" and "Small Projects" screening criteria. As previously stated, proposed projects are not required to satisfy all of the City's screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. Through satisfaction of one or more of the screening criteria, the proposed Canwood Office Campus project is determined to have a less than significant transportation impact.

Please feel free to call us at 626.796.2322 with any questions or comments regarding the VMT assessment prepared for the proposed Canwood Office Campus project.

Attachments

- c: Martin Teitelbaum, Martin Teitelbaum Construction
K.C. Jaeger, LLG Engineers
File



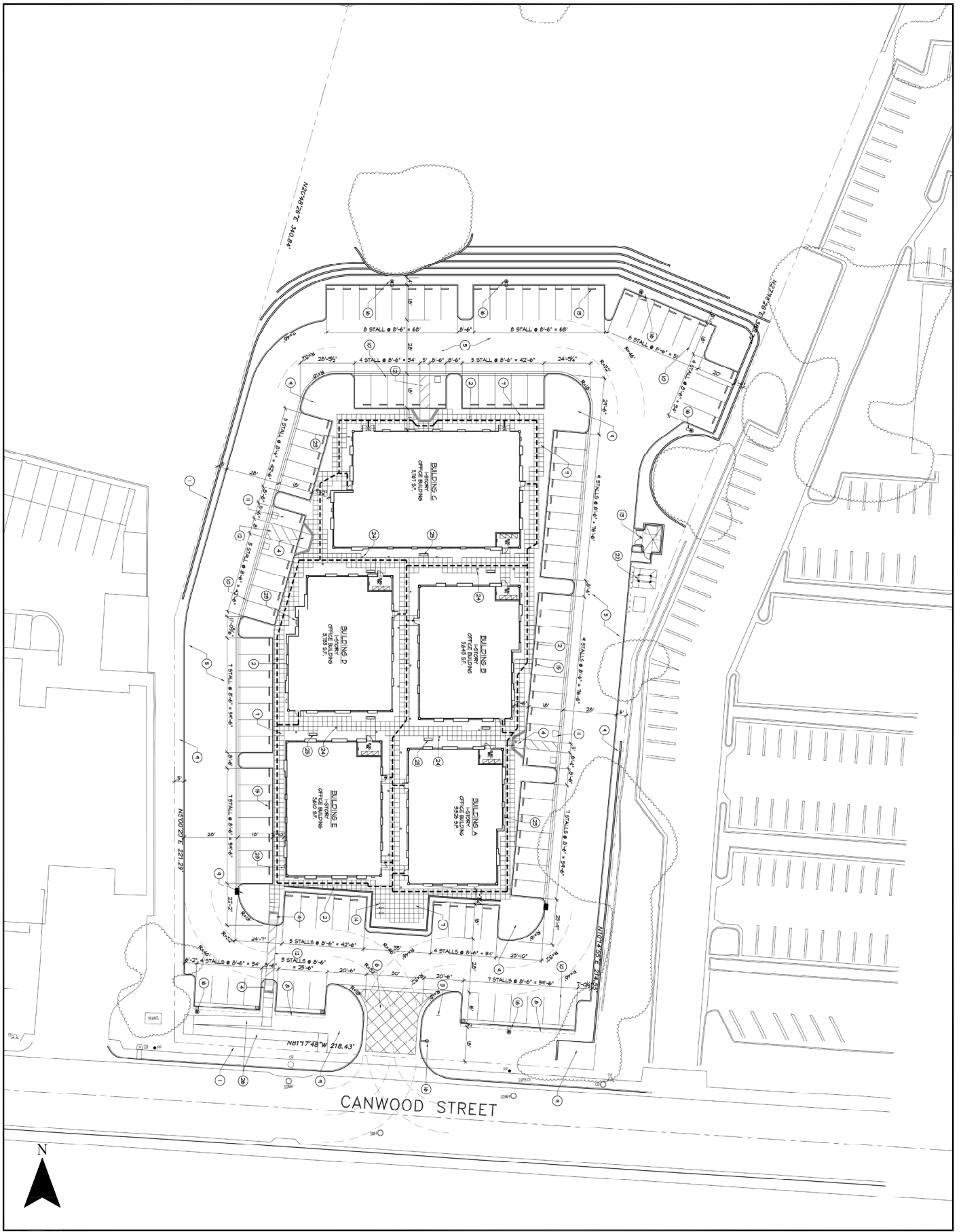
MAP SOURCE: RAND MCNALLY & COMPANY

Project Site



Figure 1
Vicinity Map

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SOURCE: PK ARCHITECTURE

Figure 2
Site Plan

Canwood Office Campus Project

Table 1
PROJECT TRIP GENERATION FORECAST
Option 1

TRIP GENERATION RATES [1]									
ITE LAND USE CATEGORY	ITE LAND USE CODE	VARIABLE	WEEKDAY DAILY	WEEKDAY AM PEAK HOUR			WEEKDAY PM PEAK HOUR		
				IN (%)	OUT (%)	TOTAL	IN (%)	OUT (%)	TOTAL
Medical-Dental Office Building	720	Per 1,000 SF	34.80	78%	22%	2.79	28%	72%	3.46

PROJECT TRIP GENERATION FORECAST									
LAND USE	ITE LAND USE CODE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
Medical Office	720	21,100 GSF	734	46	13	59	20	53	73
TOTAL PROJECT TRIPS			734	46	13	59	20	53	73

[1] Source: ITE "Trip Generation Manual", 10th Edition, 2017.

[2] Trips are one-way traffic movements, entering or leaving.

Table 2
PROJECT TRIP GENERATION FORECAST
Option 2

TRIP GENERATION RATES [1]									
ITE LAND USE CATEGORY	ITE LAND USE CODE	VARIABLE	WEEKDAY DAILY	WEEKDAY AM PEAK HOUR			WEEKDAY PM PEAK HOUR		
				IN (%)	OUT (%)	TOTAL	IN (%)	OUT (%)	TOTAL
General Office Building	710	Per 1,000 SF	9.74	86%	14%	1.16	16%	84%	1.15
Medical-Dental Office Building	720	Per 1,000 SF	34.80	78%	22%	2.79	28%	72%	3.46

PROJECT TRIP GENERATION FORECAST									
LAND USE	ITE LAND USE CODE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
General Office	710	11,000 GSF	107	11	2	13	2	11	13
Medical Office	720	10,100 GSF	351	22	6	28	10	25	35
TOTAL PROJECT TRIPS			458	33	8	41	12	36	48

[1] Source: ITE "Trip Generation Manual", 10th Edition, 2017.

[2] Trips are one-way traffic movements, entering or leaving.