Appendix J-1

VMT Assessment

MEMORANDUM

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To:	Mr. Michael Conger County of Ventura – Resource Management Agency	Date:	January 24, 2025
From:	Grace Turney, P.E., RSP1 Chin S. Taing, PTP, RSP1 Linscott, Law & Greenspan, Engineers	LLG Ref:	1-24-4573-1
Subject:	**American Jewish University – Camp Alonim EIR Project Supplemental VMT Assessment County of Ventura, California**		

Linscott, Law & Greenspan, Engineers (LLG) has prepared this memorandum to summarize the supplemental review conducted for the proposed expanded facilities and operations associated with the American Jewish University – Camp Alonim EIR project ("proposed project" herein) located at 1101 Peppertree Lane in the unincorporated area of the County of Ventura, California. We understand that the preparation of this qualitative Vehicle Miles Traveled (VMT) assessment has been requested as the appropriate environmental review documentation in order to address transportation issues and to comply with the requirements of the California Environmental Quality Act (CEQA). The proposed project will be qualitatively evaluated based on the recommended methodology provided in the State of California Governor's Office of Planning and Research (OPR)'s 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA*[1].

SB 743 Background

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743 (Steinberg, 2013). Among other things, SB 743 initiated a change in the methodology to analyze transportation impacts under CEQA (Public Resources Code Section [PRC] 21000 and following). Through PRC Section 21099, which states in part that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment," SB 743 directed the Governor's Office of Planning and Research (OPR) to identify a new metric for evaluating transportation impacts. OPR identified VMT as the most appropriate metric, and developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA* ("*Technical Advisory*"), which provides non-binding recommendations on the implementation of VMT analysis methodology that has significantly informed the way VMT analyses are conducted in the State. State-wide implementation of the new metric was required by July 1, 2020.

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

The updated CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The *Technical Advisory* provides considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

As defined by the CEQA Guidelines, the County of Ventura is the lead agency for the proposed project. While the County of Ventura requires VMT analysis to be prepared using the Ventura County Traffic Model (VCTM), it was acknowledged by County staff that given the unique characteristic of the proposed project, use of the VCTM would not be appropriate to evaluate the significance of the project's VMT impacts. Therefore, this qualitative VMT assessment has been prepared. Since the County's guidelines do not provide direction on the preparation of qualitative assessments, this assessment is based on the recommendations provided in the *Technical Advisory*.

Existing Project Site

The existing project site consists of two legal lots totaling 2,558 acres with Assessor's Parcel Numbers 685-0-051-040, -050, -140, -190, and -210. Located south of the SR-118 Freeway, the existing camp operates within a 328-acre portion of the total 2,558-acre property. The project site address is 1101 Peppertree Lane. Vehicle access is currently provided by the southern terminus of Tapo Canyon Road. The proposed project site and general vicinity are shown in ***Figure 1***.

Project Description

The proposed project consists of the development of additional facilities at the existing summer camp (i.e., Camp Alonim) to include a 4,460 square-foot welcome center, 13 duplex-style camper cabins, three head counselor cabins, a 2,307 square foot open-air shade structure arts pavilion, a new 58-space surface parking lot, and landscaping improvements around the new structures. The removal of three housing trailers, two cottages, a garage, and one cabin would also be necessary for the project development.

As noted in the *Traffic Impact Study*[2], the three types of uses anticipated under this proposed project are generally categorized as summer camps, temporary events, and assembly uses. It is anticipated that the number of summer camp attendees will increase by 100, from approximately 400 campers to 500 campers with the proposed project. Temporary events and assembly uses are also expected to increase in usage (i.e., in the number of events and attendance figures per event) throughout the remainder of the year. The comparison of the frequency of events and attendance figures between existing and proposed conditions are as follows for the various project components:

Camp Operation

Existing Camp Operation (10 weeks during Summer):

- 400 campers (300 overnight, 100 day campers)
- 150 staff

Proposed Camp Operation (10 weeks during Summer):

- 500 campers (400 overnight, 100 day campers)
- 150 staff

Temporary Events/Assembly Uses

Existing Temporary Events/Assembly Uses (Annually):

- Up to 15 events (i.e., weddings, bar and bat mitzvahs) with a maximum of 300 guests/event
- For 42 weeks annually, educational day and overnight programs with weekend events attended by a maximum of 300 guests and weekday events attended by a maximum of 100 guests
- 20 educational staff

Proposed Temporary Events/Assembly Uses (Annually):

- Up to 50 events (i.e., weddings, bar and bat mitzvahs) with a maximum of 1,000 guests/event
- For 42 weeks annually, educational day and overnight programs with weekend events attended by a maximum of 1,000 guests and weekday events attended by a maximum of 100 guests
- 20 educational staff

[2] *Memorandum for American Jewish University Camp Expansion - Traffic Impact Study*, to Ventura County Public Works Roads and Transportation, July 6, 2023.

Project Trip Generation

As included in the project trip generation utilized in the *Traffic Impact Study,* the project trip generation was derived based on empirical data obtained from existing traffic counts and estimated number of guests and average vehicle occupancy for the summary camps, temporary events, and assembly uses. It should be noted that concurrent summer camps, temporary events, and assembly uses are rarely expected to occur. However, the weekday daily, AM and PM peak hour trip generation shown below does reflect concurrent uses of the summer camps, temporary events, and scheduled events in order to evaluate the worst-case condition:

Concurrent Use/Worst-Case Project Trip Generation

Weekday Daily: 563 net new trips (297 inbound trips, 266 outbound trips)

Weekday AM Peak Hour: 16 net new trips (11 inbound trips, 5 outbound trips)

Weekday PM Peak Hour: 12 net new trips (7 inbound trips, 5 outbound trips)

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. In the *Technical Advisory*, OPR recommends screening criteria based on the number of daily vehicle trips, existing low VMT areas, proximity to high-quality transit, and inclusion of affordable housing.

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 generally sufficient for screening purposes. Projects, or project components, which are screened out of detailed VMT assessment based on these criteria are presumed to have less than significant transportation impacts. Projects or project components which are not screened out would be required to conduct a formal Transportation Impact Analysis in order to determine the significance of project impacts.

Small Project Trip Generation Screening Criteria

The *Technical Advisory* 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."

As presented above, the proposed project is forecast to generate a total of 563 daily net new vehicle trips under worst-case conditions. Therefore, it exceeds the 110 daily vehicle trip threshold and the small project trip generation screening criterion is not satisfied.

Low VMT Area Screening Criteria

It is assumed that projects which will be located within areas which currently exhibit low VMT, and that incorporate similar features pertaining to density, land use mix, and transit availability, will tend to exhibit similar low VMT. In areas where the existing VMT generation already falls below the applicable thresholds, and where projects are likely to generate similar levels of VMT, projects may be screened out of preparing detailed VMT analysis. OPR notes that such screening is appropriate for residential and office projects. Based on the unique characteristics of the proposed project and the minimal existing development within the Transportation Analysis Zone (TAZ) in which the proposed project is located, this screening criterion is determined to not be applicable.

Proximity to Transit Screening Criteria

CEQA Guidelines Section 15064.3(b)(1) states in part: "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." OPR recommends additional screening criteria for projects which meet the statutory screening threshold, noting that certain project-specific or location-specific information might indicate that the presumption of less than significant impacts is not appropriate.

The proposed project site is not located within a one-half mile radius of a major transit stop[3] or an existing stop on a high-quality transit corridor[4]. Therefore, the proximity to transit screening criterion is not satisfied.

Affordable Residential Development Screening Criteria

In the *Technical Advisory*, OPR refers to research indicating that low-income housing in infill locations generally improves the jobs-housing match, shortening commutes and reducing VMT. OPR asserts that evidence supports presuming less than significant transportation impacts for 100 percent affordable residential developments, and that a project consisting of a high percentage of affordable housing may be a basis for a lead agency to find a less than significant impact on VMT, thereby screening out of detailed VMT analysis.

The proposed project does not include any permanent housing units. Therefore, the affordable residential development screening criterion is not applicable.

Screening Conclusions

The proposed project does not meet any of the screening criteria recommended in the *Technical Advisory*. Therefore, the proposed project is required to provide an impact assessment in order to determine the significance of project-generated VMT impacts.

VMT Impact Analysis

As previously described, County staff acknowledged that quantitative analysis utilizing the VCTM would not be appropriate given the unique characteristics of the proposed project. It is understood that regional travel demand models cannot accurately evaluate intermittent and seasonal uses such as the summer camps, temporary events, and assembly uses which are planned to be accommodated at the project site. Therefore, in consultation with County staff, it was determined that a qualitative VMT assessment would be the most appropriate.

[3] Public Resources Code Section 21064.3: ""Major transit stop" means a site containing any of the following: (a) An existing rail or bus rapid transit station. (b) A ferry terminal served by either a bus or rail transit service. (c) The intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.

[4] Public Resources Code Section 21155(b): "For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

Similar to other summer camp facilities, the Camp Alonim project represents a regional draw in that camp participants and staff reside throughout the greater Southern California region and beyond (as described in further detail below). Therefore, the proposed project was assessed to determine whether it would be likely to generate higher or lower VMT than other summer camp facilities in the region. A comparatively higher VMT would represent a significant impact, whereas a comparatively lower VMT would result in a less than significant impact.

Qualitative VMT Assessment

The proposed Camp Alonim expansion project is expected to improve the proximity of camp facilities serving the local community, thereby shortening travel distances and reducing VMT. In the absence of the expanded Camp Alonim site, future campers or special event patrons would be required to travel to comparable summer camps throughout the Southern California region which are located farther away, thus leading to longer trips and increased regional VMT.

Figure 2 illustrates a map of the ten (10) nearest existing comparable camp facilities located within Ventura County and outside of Ventura County. As shown in *Figure 2*, approximately half of these existing camp facilities are located within a 50-mile radius from the site, while the other remaining half are located further within a 100-mile radius. Detailed descriptions of these other comparable camp facilities are attached and included in ***Attachment A***. As the nearest comparable facility (i.e., prior Camp Hess Kramer/Grindling Hilltop Camp located at 11495 Pacific Coast Highway, Malibu) is located roughly 40 miles southwest of the project site and is not currently in operation due to the 2018 Woosley Fire, the proposed project is expected to improve proximity of camp facilities for the community located in the surrounding area.

Spatial Distribution of Existing Campers and Staff

The project applicant provided detailed information regarding the spatial distribution of campers and staff of the existing Camp Alonim, which are primarily drawn from the surrounding Southern California region. The spatial distribution data is based on the existing camper and staff population by ZIP codes and has been assumed to apply to the future conditions/projections with the increase of camper population. No significant shifts in the home location of existing camp patrons or staff are expected to occur as a result of the proposed project, and future campers and staff are expected to be drawn from the same general locations. ***Figure 3*** illustrates the spatial distribution of existing campers by ZIP codes and ***Figure 4*** illustrates the spatial

distribution of existing staff population. The spatial distribution encompassing both camper and staff population by ZIP codes are shown in ***Figure 5***. While a small proportion of both campers and staff are located in the Ventura County area (e.g., Cities of Simi Valley, Thousand Oaks, Moorpark, Camarillo, and Ventura), the majority of campers and staff (e.g., approximately 73%) are drawn from ZIP codes within Los Angeles County. A smaller number of staff are drawn from the Counties of Santa Barbara, Orange, and San Diego, as well as from Central and Northern California and from out of state.

The general locations and approximate proportions of camper and staff population at the existing project site and other comparable camp facilities by specified distances from the site locations are summarized in ***Table 1***. As presented in *Table 1*, 19% of the total camper and staff population reside within 5 to 10 miles from the site, and 35% of the total camper and staff population reside within 10 to 20 miles of the project site. When compared to other camp facilities, the existing Camp Alonim camper and staff population are generally situated within 50 to 100 miles of other comparable camp facilities, which are much farther away than the project site. For the next nearest camp facility to the project site (i.e., prior Camp Hess Kramer), 65.8% of the Camp Alonim camper and staff population reside within 20 to 50 miles from that site. Travel between the current locations of Camp Alonim campers and staff and other comparable camp locations would require longer vehicle trips and result in higher regional VMT. The proposed Camp Alonim expansion project would increase the proximity of summer camp opportunities nearest to the region with the highest concentration of participants and staff, resulting in comparatively shorter vehicle trips and lower VMT.

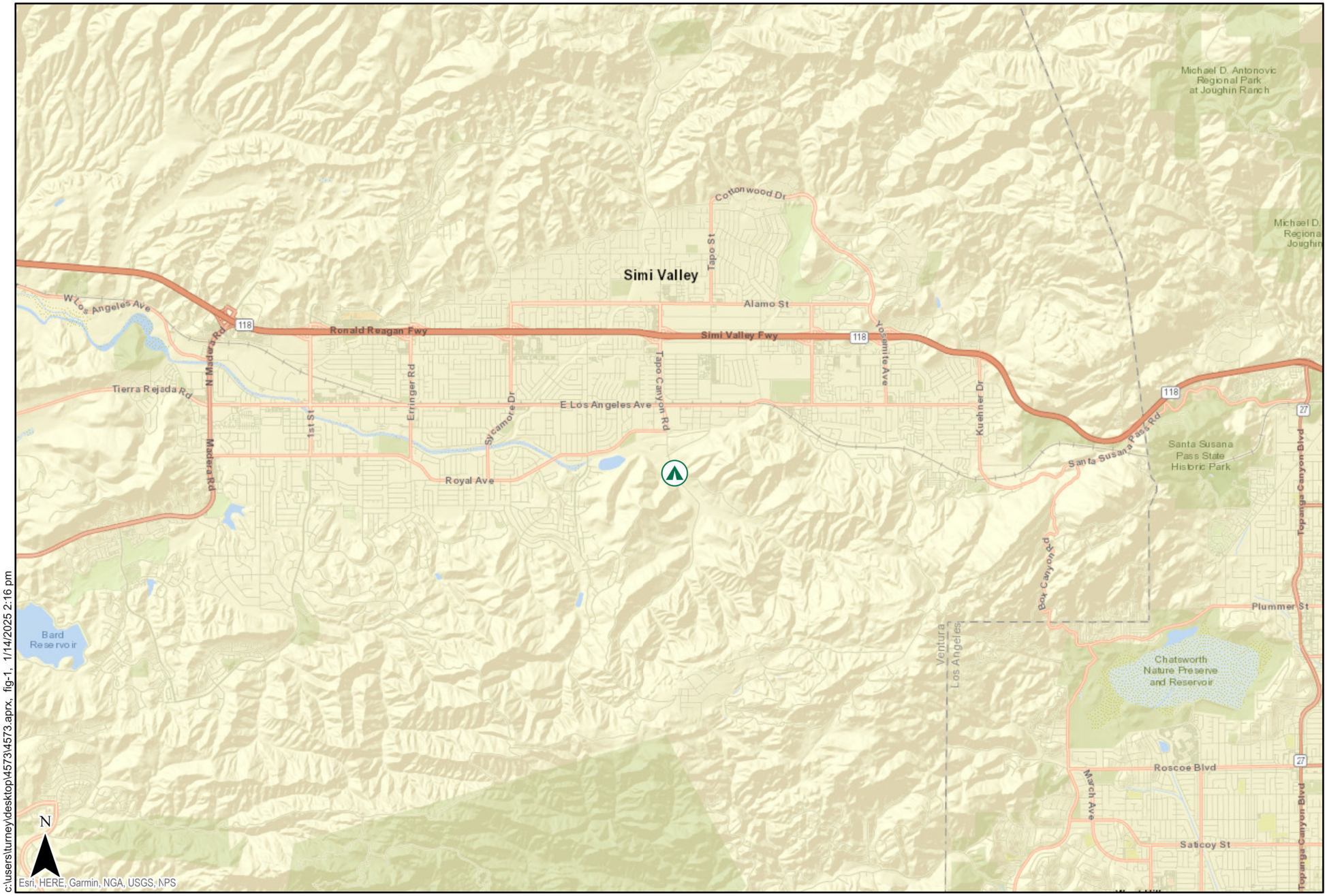
Given the spatial distribution of the Camp Alonim camper and staff population between the project site and other camp locations, it is qualitatively concluded that the proposed project would reduce VMT by shortening trips. Since the proposed project is expected to reduce VMT compared to other summer camp facilities, the project is determined to have a less than significant VMT impact.

Summary of Key Findings and Conclusions

This qualitative VMT assessment has been conducted to identify and evaluate the potential impacts of the proposed project based on the VMT screening criteria, methodology, and thresholds recommended in OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*. By increasing capacity nearest to the greatest regional concentration of future participants, the proposed project would result in shorter vehicle trips in place of longer ones, thus reducing VMT compared to

other summer camp facilities. Therefore, it is qualitatively concluded that the proposed project would have a less than significant VMT impact.

Please feel free to call us at 626.796.2322 with any questions or comments regarding the supplemental VMT assessment prepared for the proposed American Jewish University – Camp Alonim EIR project.



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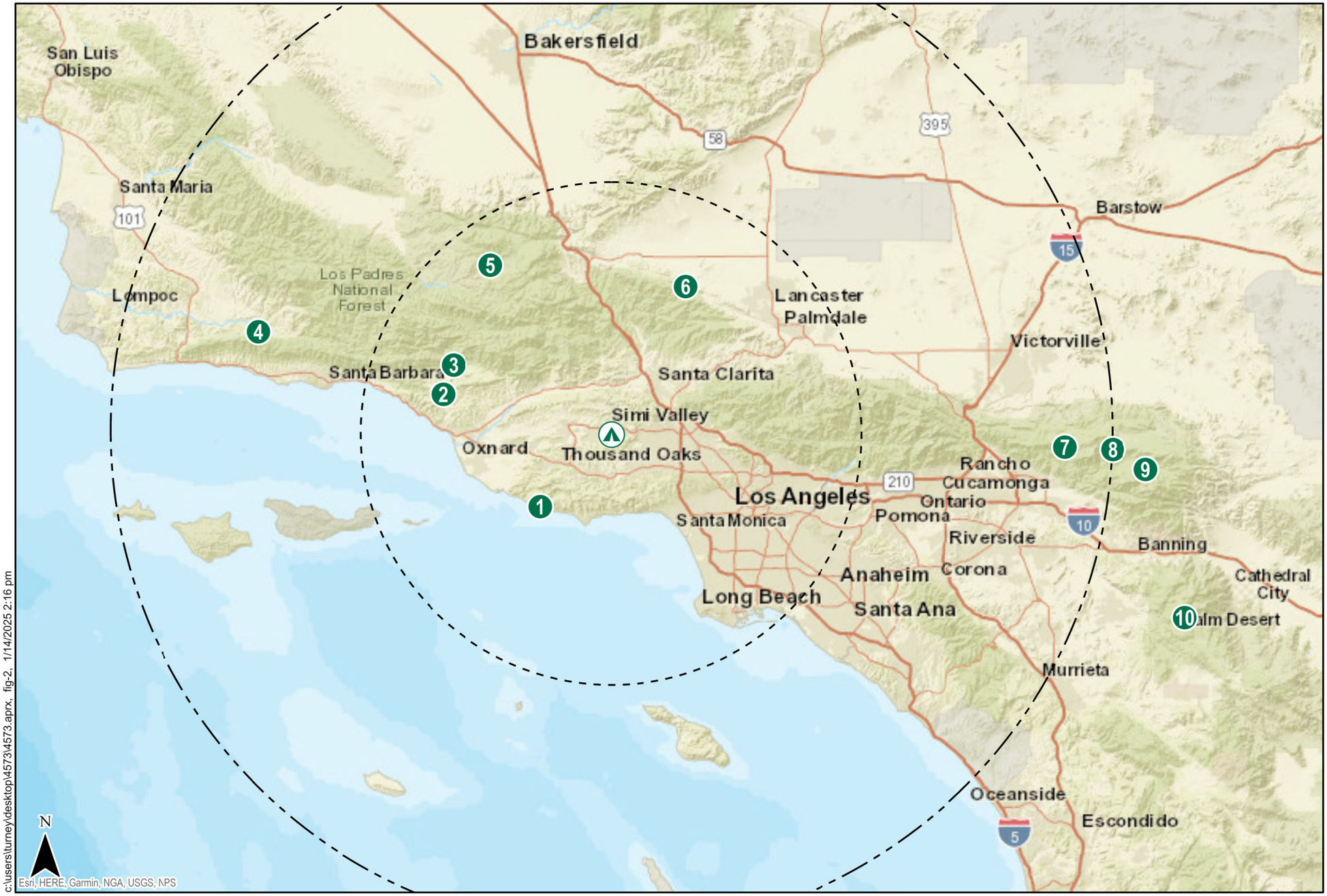
Project Site

Figure 1
Vicinity Map

American Jewish University - Camp Alonim Project



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Project Site

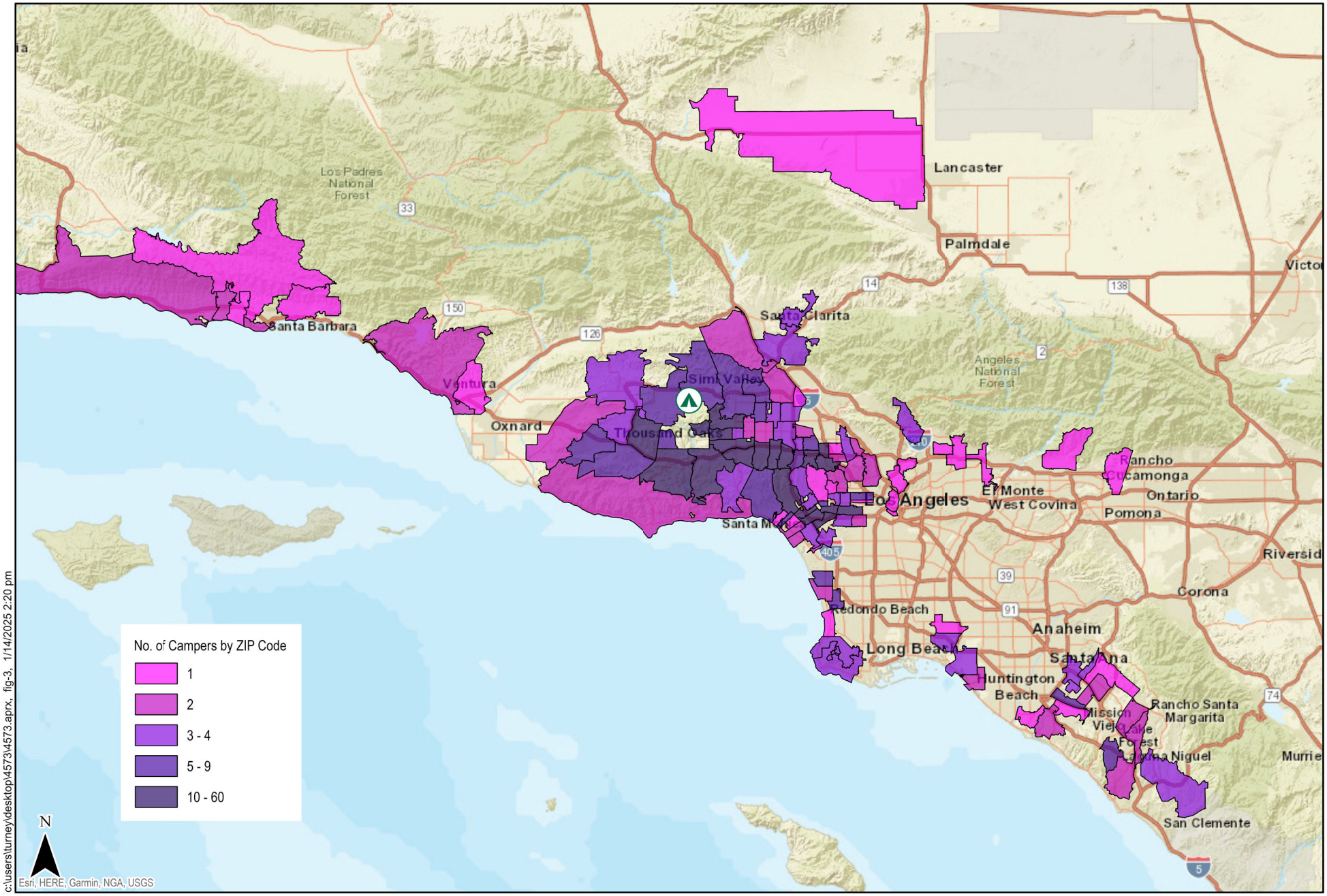
Other Camps

50 Mi. Radius

100 Mi. Radius

Figure 2
Location of Similar Facilities

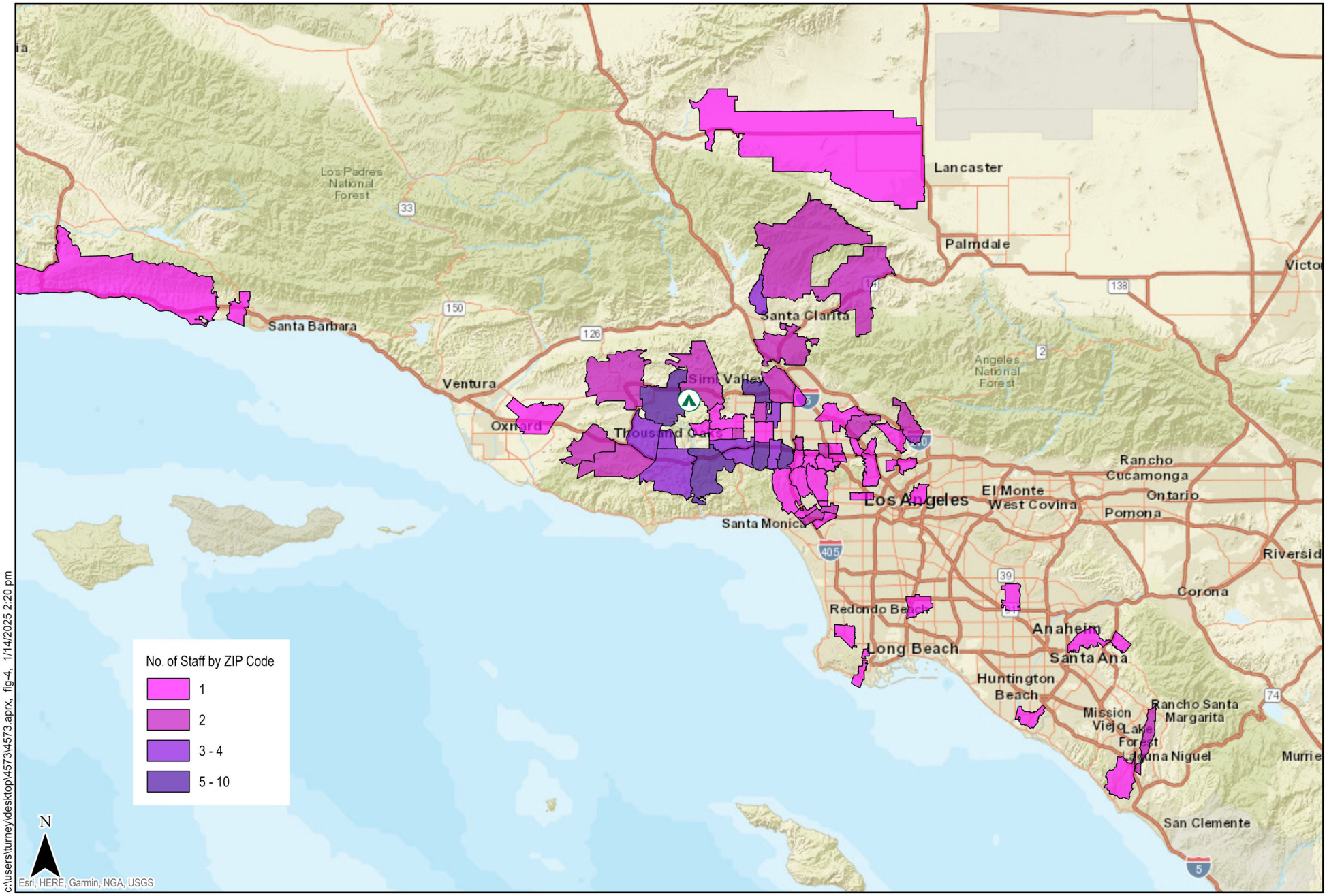
American Jewish University Camp Alonim Project



Project Site

Figure 3
Location of Campers

American Jewish University - Camp Alonim Project



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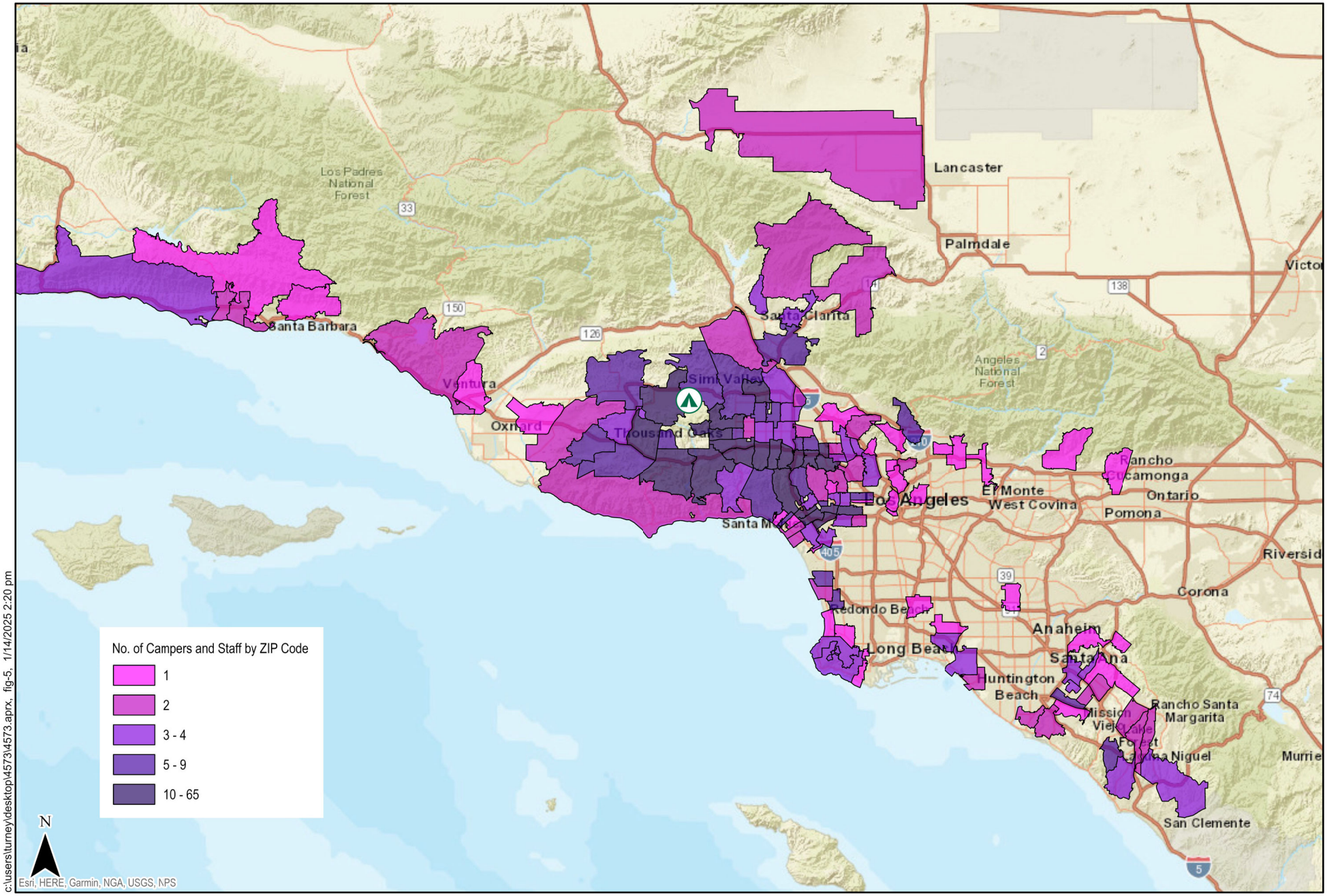
Project Site

Figure 4
Location of Staff

American Jewish University - Camp Alonim Project



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Project Site

Figure 5
Location of Campers and Staff

American Jewish University - Camp Alonim Project

Table 1
SPATIAL DISTRIBUTION OF CAMP ALONIM CAMPERS AND STAFF [1]

LOCATION [2]	DISTANCE TO SITE												TOTAL
	0 - 5 Miles		5 - 10 Miles		10 - 20 Miles		20 - 50 Miles		50 - 100 Miles		100+ Miles		
	TOTAL POP. [1]	PERCENT	TOTAL POP. [1]	PERCENT	TOTAL POP. [1]	PERCENT	TOTAL POP. [1]	PERCENT	TOTAL POP. [1]	PERCENT	TOTAL POP. [1]	PERCENT	
Project site: Camp Alonim	20	2.1%	183	19.0%	337	35.0%	240	24.9%	65	6.7%	118	12.3%	963
1. Camp Hess Kramer	0		18	1.9%	123	12.8%	634	65.8%	70	7.3%	118	12.3%	963
2. Camp Arnaz	2	0.2%	1	0.1%	2	0.2%	461	47.9%	360	37.4%	137	14.2%	963
3. Camp Ramah	0		2	0.2%	3	0.3%	463	48.1%	354	36.8%	141	14.6%	963
4. Camp Rancho Alegre	0		3	0.3%	7	0.7%	4	0.4%	738	76.6%	211	21.9%	963
5. Camp Three Falls	0		0		0		219	22.7%	583	60.5%	161	16.7%	963
6. Canyon Creek Summer Camp	0		2	0.2%	9	0.9%	736	76.4%	98	10.2%	118	12.3%	963
7. Pali Adventures	0		0		0		4	0.4%	814	84.5%	145	15.1%	963
8. Camp Gilboa	0		0		0		2	0.2%	748	77.7%	213	22.1%	963
9. Camp Mountain Chai	0		0		0		1	0.1%	631	65.5%	331	34.4%	963
10. Astrocamp	0		0		0		0		222	23.1%	741	76.9%	963

[1] Total population represents the total number of campers and staff at the Camp Alonim project site within the specified distance from the site locations.

[2] In addition to the project site, other comparable site locations are identified by the project team/City staff. The total population represents the total number of Camp Alonim campers and staff that are located within the specified distances to the comparable site locations. Details of the comparable sites are included in *Appendix A*.

ATTACHMENT A

DATA FOR OTHER COMPARABLE CAMP FACILITIES

Locations and Descriptions of Comparable Camp Facilities

No.	Name	County	Address	PopDescription	Description
1	Camp Hess Kramer / Gindling Hilltop Camp	Ventura County	11495 Pacific Coast Highway, Malibu, CA 90265	557 campers; 100 staff.	Summer camp associated with the Wilshire Boulevard Temple in Los Angeles. Camp has been out of operation since the 2018 Woolsey Fire.
2	Camp Arnaz	Ventura County	155 Sulphur Mountain Road, Ventura, CA 93001	Not specified by permit. Facilities include approx. 12,000 sq. ft. of lodging facilities and 8,000 sq. ft. of accessory facilities.	Summer camp for the Girl Scouts of California's Central Coast
3	Camp Ramah in California	Ventura County	385 Fairview Road, Ojai, CA 93023	600-650 campers; 93 daytime employees; 255 overnight employees.	Summer camp affiliated with the Conservative Movement of Judaism. Additional programs and activities occur outside of the summer season.
4	Camp Rancho Alegre	Outside of Ventura County	2680 Highway 154, Santa Barbara, CA 93105		Summer camp for the Los Padres Council of the Boy Scouts of America. Severely damaged in 2017 Whittier Fire.
5	Camp Three Falls	Ventura County	12260 Boy Scout Camp Road, Frazier Park, CA 93225	817 for daily activities; 408 for overnight.	Summer camp for the Ventura County Council of the Boy Scouts of America. In October 2023, the Ventura County Council decided to close the camp due to low attendance.
6	Canyon Creek Summer Camp	Outside of Ventura County	18651 Pine Canyon Road, Lake Hughes, CA 93532		Privately run summer camp.
7	Pali Adventures	Outside of Ventura County	30778 Highway 18, Running Springs, CA 92382		Privately run summer camp.
8	Camp Gilboa	Outside of Ventura County	38200 Bluff Lake Road, Big Bear Lake, CA 92315		Summer camp affiliated with J Los Angeles and the Habonim Dror Zionist youth movement.
9	Camp Mountain Chai	Outside of Ventura County	42900 Jenks Lake Road West, Angelus Oaks, CA 92305		Summer camp associated with the Jewish community in San Diego County.
10	Astrocamp	Outside of Ventura County	26800 Saunders Meadow Road, Idyllwyld, CA 92549		Summer camp focused on science, technology, engineering, and math.
n/a	Camp Newman	Outside of Ventura County	4088 Porter Creek Road, Santa Rosa, CA 95404		Summer camp affiliated with the Union for Reform Judaism
n/a	Camp Tawonga	Outside of Ventura County	31201 Mather Road, Groveland, CA 95321		Summer camp associated with the Jewish community in San Francisco
n/a	Glen Deven Ranch	Outside of Ventura County	37102 Garrapatos Road, Carmel-by-the-Sea, CA 93923	300 overnight.	Summer camp offered by the Big Sur Land Trust
n/a	Camp Whitsett	Outside of Ventura County	Forest Route 22S82, Kernville, CA 93238		Summer camp for the Western Los Angeles County Council of the Boy Scouts of America.
n/a	Camp Chawanakee	Outside of Ventura County	43485 Dinkey Creek Road, Shaver Lake, CA 93664		Summer camp for the Sequoia Council of the Boy Scouts of America.
n/a	Skylake Yosemite Camp	Outside of Ventura County	37976 Road 222, Wishon, CA 93669		Privately run summer camp.
n/a	Camp Ocean Pines	Outside of Ventura County	1473 Randall Drive, Cambria, CA 93428		Privately run summer camp.