Appendix E

Transportation Memo

iteris®
213.488.0345
iteris.com
801 South Grand Avenue, Suite 750
Los Angeles, CA 90017

DRAFT MEMORANDUM

To: City of Ventura	**From:** Iteris, Inc.
Date: April 23, 2025	
RE: Ventura General Plan Update – **Draft** CEQA Transportation Impact Analysis	

INTRODUCTION

This memorandum describes the California Environmental Quality Act (CEQA) transportation impact analysis for the City of Ventura General Plan Update (GPU). The evaluation is consistent with CEQA Guidelines effective December 28, 2018. The General Plan Update's impacts are evaluated per Appendix G Environmental Checklist Form of the current CEQA guidelines, which assesses projects by the four criteria listed below:

T-1 *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

T-2 *Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

T-3 *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

T-4 *Would the project result in inadequate emergency access?*

PROJECT SETTING

Ventura is served by a system of streets and paths that enable connections within the City and to the regional transportation system. The facilities are classified by their function with different characteristics and accommodations for modes of travel and access to adjacent land use. The system supports multiple modes of travel and contains network elements that support vehicular, bicycle, pedestrian, and transit travel.

The local pedestrian network is a sidewalk system along the roadway network, greenbelts, and trails with sidewalk crossings at intersections. The City's Road Design and Construction Standards require sidewalk for all roadway cross sections with a five-foot minimum sidewalk with no buffer area (monolithic) and four-foot minimum sidewalk if a buffer is present (detached).

The local bicycle network in Ventura is composed of a combination of facilities on roadways, sidewalks, and off-street paths. A defined bikeway network describes the hierarchy of bicycle-specific infrastructure. The recommended bicycle network is based on the Ventura Active Transportation Plan (ATP), which was approved in December 2023.

Lastly, public transportation options in the City of Ventura are varied and include local fixed-route bus service, county inter-city express bus service, paratransit, and dial-a-ride services. Local fixed-route bus service is provided by the Gold Coast Transit District (GCTD), which services the cities of Ventura, Oxnard, Ojai, and Port Hueneme and is the largest transit operator in Ventura County. In addition to GCTD, regional bus service is provided by VCTC Transit, which operates multiple routes providing connections across Ventura County.

ANALYSIS METHODOLOGY

For impact criteria T-1, T-3, and T-4, a qualitative assessment was prepared, through review of the General Plan Update goals and policies (and comparing against relevant plans as appropriate) to determine if any potential significant impacts would occur as a result of the Project.

For impact criteria T-2, a technical analysis was performed using the focused City of Ventura travel demand forecasting model (VTDFM), a computerized travel demand model developed by Iteris as part of the General Plan Update process. Iteris utilized the new model to generate the Vehicle Miles Traveled (VMT) statistics. This land-use based model, which is a subarea model of the Ventura County Transportation Model (VCTM), is consistent with the 2016 SCAG RTP/SCS travel-demand model assumptions and inputs. The model consists of a base year scenario and future year scenario. The VCTM consists of a detailed traffic analysis zone (TAZ) structure in the City of Ventura, including 290 TAZ's within the City.

For the impact criteria T-2 analysis, all VMT for trips beginning or ending in the City were accounted for, consistent with the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA. While other methodologies measure only the amount of VMT traveling on streets within the City, or only half the distance of trips from outside of the City (as in SB 375 Regional Plan Climate Target analysis), the General Plan Update analyzes the full extent of vehicle travel from the Project.

For the purposes of the analysis, the VCTM future scenario year is used to represent the General Plan buildout year of 2050. This is a conservative approach, as a review of SCAG 2016 RTP/SCS and 2020 RTP/SCS shows a reduction in population and employment forecasts in Ventura County in SCAG's future year of 2045.

In order to determine the GPU project's potential level of impact, a new scenario was prepared, incorporating the 2050 land use projections (within the City of Ventura) of the General Plan Update. For land use plans which include both residential and employment uses, the appropriate analysis metric is VMT per service population, where service population is defined as the number of residents plus the number of employees. **Table 1** summarizes the General Plan Update's proposed net changes in land use, which were incorporated into the TAZ's based on the location of change areas.

Table 1: Proposed General Plan Update Net Land Use Changes

Land Use Type	Existing/Baseline	Proposed Land Use Plan (2050)	Net Change
Residential			
Residential Units	45,300 units	56,820 units	+11,510 units
Non-Residential			
Employment	67,980 jobs	72,610 jobs	+4,630 jobs

As shown, the GPU's anticipated change in dwelling units and employment by 2050 is:

- Addition of 11,510 residential units; and
- Addition of 4,630 jobs.

IMPACT ANALYSIS

This section presents the CEQA impact evaluation for each of the four criteria.

T-1 Impact Evaluation

The General Plan Update project's planned transportation networks, goals and policies provide consistency related to regional active transportation plans, transit plans, and other mobility infrastructure; specifically the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy and Ventura County Transportation Commission Comprehensive Transportation Plan.

Ventura Active Transportation Plan

The City adopted an ATP in December 2023, reiterating the City's commitment to promoting walking and biking. The ATP focuses on prioritized pedestrian and bicycle projects and programs, complete streets guidelines, and safe routes to school action plans. The ATP represents broad community interests and was developed in coordination with the General Plan Circulation Element and supports General Plan goals related to reducing the reliance on driving. The ATP has a goal to create walking and bicycling networks that allow people to get where they need to go with comfort and safety, which has been incorporated into the General Plan Mobility Element.

Based on an assessment of the VMT reduction potential of the ATP, 1.7 percent of VMT could be reduced through its implementation. The assessment used the California Air Pollution Control Officers Association *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (October 2024).[1] For pedestrian improvements, a reduction of up to 6.4 percent reduction in vehicle travel in the plan/community area was factored with the ATP showing pedestrian improvements on 24.2 percent of roadways and therefore a forecasted VMT reduction of 1.5 percent (6.4 percent x 24.2 percent = 1.5 percent). For bicycle improvements, the Handbook indicated a 0.8 percent reduction of vehicles from parallel roadways for bicycle lanes and paths and 0.2 percent

[1] https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update_AB434.pdf

reduction for bicycle boulevards. The ATP shows bicycle lane and path improvements on 22.4 percent of roadways and bicycle boulevard improvements on nine percent of roadways resulting in a 0.2 percent reduction in VMT from bicycle improvements (22.4 percent x 0.8 percent + 9 percent x 0.2 percent = 0.2 percent reduction).

SCAG Regional Transportation Plan/Sustainable Communities Strategy

Ventura is a member of the SCAG Regional Council, the decision-making body of the SCAG Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal RTP/SCS is a planning document for the region, allowing project sponsors to qualify for federal funding. In addition, Connect SoCal 2024 identifies a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, and support our vital goods movement industry.

The RTP/SCS is updated every four years and it is anticipated that the City will work with SCAG to update the RTP/SCS to be consistent with the City's General Plan. The General Plan includes strategies to focus development (areas of change) in the City's commercial core, which allows multiple land uses to work together, to reduce vehicle trip lengths. The California Air Resources Board's (CARB) 2016 Mobile Source Strategy recognizes that coordinated regional planning can improve California's land use patterns and transportation policy in a way that reduces transportation related emissions by reducing growth in VMT.

Ventura County Transportation Commission (VCTC) Comprehensive Transportation Plan

The VCTC Comprehensive Transportation Plan (CTP) is a transportation vision for Ventura County and identify ways of achieving this vision within constrained resources. The CTP is a long-range policy document, built from community-based, local priorities and community-expressed need to enhance regional connections. It is aimed at ensuring mobility and enhancing the quality of life for all Ventura County residents. The CTP provides a framework for future community-based planning and collaboration and inform Ventura County's long-range transportation decisions. The City's General Plan Update is consistent with the CTP goals of:

- Goal 1: Balance Transportation and Land Use
- Goal 2: Reduce Emissions and Improve Sustainability
- Goal 3: Foster Economic Prosperity
- Goal 4: Improve Multimodal Mobility Choices and Access to Destinations
- Goal 5: Enhance Transportation Safety to Eliminate Deaths and Serious Injuries

The following relevant goal and policy, as part of the General Plan Mobility Element, would support consistency with these plans:

- **Goal M-1**: *Design and operate a multimodal transportation network to enable safe access for pedestrians, bicyclists, motorists and transit riders of all ages and abilities.*
    - **Policy 1.20: Support regional roadway network improvements.** Support prioritization of improvements to the regional roadway network, especially State Highways, to address mobility, accessibility and connectivity issues for all modes of transportation.

The General Plan Update is consistent with programs, plans, ordinances and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, making the impact **less-than-significant** and no further mitigation would be required.

T-2 Impact Evaluation

Under criteria T-2, the proposed General Plan Update's effects on Vehicle Miles Traveled (VMT) are evaluated, as described in the following sub-sections.

VMT Impact Analysis

Lead agencies have the discretion to choose the most appropriate methodology to evaluate a project's VMT pursuant to *CEQA Guidelines* Section 15064.3(b)(4). The City evaluates VMT impacts of individual development projects with a significant impact threshold of 15 percent below Countywide baseline. Therefore, as part of the General Plan's goal to reduce GHG emissions, the city has a policy to adopt and implement CEQA Transportation Analysis Guidelines:

- **Goal M-4**: *Reduce GHG emissions, in compliance with CEQA, via the reduction in vehicle miles traveled through the implementation of policies and programs that promote different modes of transportation other than private vehicles.*
    - **Policy 4.3: VMT Guidelines**. Adopt and implement CEQA Transportation Analysis Guidelines, which defines screening criteria, thresholds of significance, feasible mitigation measures for transportation impacts in CEQA review along with Level of Service standards for operational analysis.

The threshold of significance for VMT in this analysis is defined as:

- The project would result in a significant impact if the project conditions (in this case, the General Plan Update conditions) average daily citywide VMT per service population exceeds 15% below the existing conditions (baseline) average daily countywide VMT per service population.

Applying the described land use projections, citywide VMT outputs were developed using the City's focused model. **Table 2** summarizes the daily citywide VMT per service population for the baseline/existing and future year 2050 with General Plan Update scenarios, as well as the daily countywide VMT per service population for the baseline/existing scenario. Detailed VMT calculations are

provided in **Appendix A**.

Table 2: VMT Summary (City and County)

Scenario	Total Home-based Daily VMT	Total Work-based Daily VMT	"Other"-based VMT*	Total Daily VMT	Population	Employees	Service Population	VMT / Service Population
Baseline/Existing - City	923,800	900,800	1,904,000	3,728,600	109,380	67,980	177,360	21.02
Baseline/Existing - County	17,052,400	7,147,900	12,681,500	36,881,800	850,810	362,840	1,213,650	30,39
Future Year 2050 With GPU - City	1,055,500	834,200	1,738,500	3,628,200	137,180	72,610	209,790	17.29

* "Other" trips include school, university, shopping, social/recreational, and other non-home and non-work related trip ends.

As shown in **Table 2**, the future year 2050 with General Plan Update citywide VMT per service population is forecast to be 17.29, while the baseline citywide VMT per service population is 21.02 and baseline countywide VMT per service population (the comparison for the CEQA significance threshold) of 30.39. The future year 2050 with the General Plan Update citywide VMT is approximately 43 percent below the countywide baseline. Therefore, the future year 2050 with General Plan Update citywide VMT per service population is not forecasted to exceed the threshold. Thus, this impact is considered **less than significant**.

Goals and Policies Affecting VMT Reduction

The following relevant goals and policies, as part of the General Plan Mobility Element, would have a role in reducing future VMT:

- **Goal M-2**: *Maintain an active transportation network with high connectivity.*
  - **Policy 2.1: Support Multimodal Options.** Increase travel options such as walking, bicycling, and other modes. Prioritize mobility projects oriented towards reducing automobile trips and encouraging the use of active transportation modes, with amenities to make active transportation more appealing.
  - **Policy 2.2: Development Supportive Transportation Infrastructure.** Install roadway, transit, and active transportation improvements along existing or planned multimodal corridors, including primary bike facilities and transit routes. The supportive transportation infrastructure should close an existing gap or provide new connections.
  - **Policy 2.3: Multi-use Trails.** Promote the development and use of multi-use trails to connect housing with services, entertainment, and employment. Both pedestrians and bicyclists can utilize trails for both essential (commute) and non-essential (recreation) trips.
  - **Policy 2.4: Active Transportation Connections.** Require new developments to provide pedestrian and bicycle access and facilities as appropriate, including connections to multi-use paths. Prohibit new development from degrading, removing, or creating new gaps in the existing pedestrian and bicycle network.
  - **Policy 2.5: Bicycle Facilities.** Based on community feedback, network evaluation, and

Active Transportation Plan prioritization, upgrade and add bicycle facilities based on community feedback and network evaluation. Provide regular signage, paving, marking maintenance to bike facilities when conducting roadway maintenance.

- **Policy 2.6: Pedestrian Facilities.** Based on community feedback, network evaluation, and Active Transportation Plan prioritization, upgrade sidewalks, access ramps, and driveways citywide to ADA-compliant and accessible for all users. Remove barriers and gaps in the sidewalk network. Upgrade and add pedestrian crossings at key locations, with pedestrian bulb-outs where feasible, to increase safety and accessibility.
- **Policy 2.9: Road Connectivity.** Expand the roadway network with new developments and improve accessibility and connectivity for all road users. Extend existing streets or construct new streets to improve connectivity in a local or regional context.

- **Goal M-3**: *Increase transit efficiency and expand service.*
  - **Policy 3.1: Transit Stops**. Upgrade transit stops to include amenities such as shelters, benches, bike racks, lighting, and trash cans to encourage ridership. Upgrade transit stops to be ADA compliant to improve access to transit by riders who have mobility restrictions. Whenever possible, transit stops should be placed near intersections or near major points of interest. Transit stop locations should be spaced for access and operational efficiency.
  - **Policy 3.3: Transit Service**. Expand transit service coverage, improve connections between routes, extend hours of operation, and reduce headway to attract new ridership. Coordinate with local transit agencies and implement service changes based on operational statistics and community feedback.
  - **Policy 3.4: Transit Routes.** Add new transit routes based on demand and community feedback. Propose service changes to optimize existing transit routes based on ridership and gaps in transit routes. Balance the need for faster service, improved user experience and more extensive transit coverage.
  - **Policy 3.5: Passenger and Freight Rail.** Maximize efficient connections to passenger and freight rail service and integrate and coordinate passenger rail service with other transportation modes. Improve connections to local transit routes at the East Ventura Metrolink Station. Study the feasibility of extending Metrolink service to Ventura Downtown/Beach Station.
  - **Policy 3.7: Multimodal Transit Facility.** Develop a multimodal transit facility at a centralized location in Downtown Ventura. Coordinate with VCTC, GCTD, Union Pacific, Metrolink, Amtrak, Flixbus, and other agencies/companies offering public/private transportation services in Ventura.

- **Goal M-4**: *Reduce GHG emissions, in compliance with CEQA, via the reduction in vehicle miles traveled through the implementation of policies and programs that promote different modes of transportation other than private vehicles.*
  - **Policy 4.1: Employee Vehicle Trip Reduction**. Encourage employees in public and private sectors to use public transit, carpool, walk, or bike for commute trips. Provide resources for employees to learn about other commute options. Subject to funding, provide incentives to encourage employee vehicle trip reduction efforts.
  - **Policy 4.2: Greenhouse gas reduction.** Reduce Greenhouse Gas (GHG) emissions through

reduction in Vehicle Miles Traveled (VMT), achieved via land use planning, improved transit access, and improved active transportation infrastructure. GHG reduction should primarily focus on reducing vehicle trips and promoting the use of active transportation modes.

- **Policy 4.3: VMT Guidelines**. Adopt and implement CEQA Transportation Analysis Guidelines, which defines screening criteria, thresholds of significance, feasible mitigation measures for transportation impacts in CEQA review along with Level of Service standards for operational analysis.
- **Policy 4.4: Transportation Demand Management (TDM) strategies**. Implement Transportation Demand Management (TDM) strategies that reduce the number of vehicles trips by increasing the use of alternative transportation modes, such as ridesharing, transit, walking, and biking.
- **Policy 4.5: Car Free Zones.** Create vibrant pedestrian-only zones in high-activity areas by restricting vehicle access, enhancing public spaces with landscaping and seating, and ensuring seamless multimodal connectivity to adjacent transit and bike networks.
- **Policy 4.6: Density and Land Use Synergy.** Align transportation and land use planning by prioritizing high-density, mixed-use developments near transit hubs, bike networks, and pedestrian corridors. Encourage designs that integrate housing, retail, and services within walking or biking distance to reduce vehicle dependency and promote sustainable mobility.

T-3 Impact Evaluation

The objective of the General Plan is to ensure future development and transportation facilities would improve connectivity and linkages throughout the City. Any proposed roadway improvements included in the General Plan will be designed to City and State engineering design standards to meet sight distance requirements, including visibility of pedestrians and bicyclists. The General Plan does not propose any incompatible uses that would increase hazards. As a result, the General Plan will have a beneficial impact on geometric design features and incompatible uses. In addition, the following relevant goal and policy, as part of the General Plan's Mobility Element, would have a positive effect on geometric design:

- **Goal M-1**: *Design and operate a multimodal transportation network to enable safe access for pedestrians, bicyclists, motorists and transit riders of all ages and abilities.*
  - **Policy 1.13: Minimize transportation conflicts.** Design roadway improvements and facility modifications to minimize conflicts among pedestrians, bicycles, and automobiles by increasing sight distance for all road users and keeping traffic control signage and pavement markings well maintained.

Based on the goals and policies of the General Plan, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment. Thus, this impact is considered **less than significant**.

T-4 Impact Evaluation

The General Plan Update does not include elements that would impede emergency vehicle access. Public

roadways and buildings would conform to City and County Fire Department standards for access. In addition, the following relevant goals and policies, as part of the General Plan, would have a positive effect on emergency access:

- **Goal M-1**: *Goal M-1: Design and operate a multimodal transportation network to enable safe access for pedestrians, bicyclists, motorists and transit riders of all ages and abilities.*
    - **Policy 1.15: Evacuation plan and implementation.** Designate routes and define procedures for an organized, phased and supervised withdrawal, dispersal, or removal of civilians from dangerous or potentially dangerous areas to their reception and care in safe areas on routes that can be utilized and/or adapted during emergency evacuations.

- **Goal SE-6**: *Ensure effective and efficient evacuation and disaster response for the entire community during emergencies.*
    - **Policy 6.1: Single Access Neighborhoods.** As feasible, eliminate and minimize evacuation challenges with single access residential neighborhoods and develop secondary access.
    - **Policy 6.2: Single Access Neighborhood Emergency Access.** If secondary access cannot be established in single access neighborhoods, ensure that roadways and access points are in compliance with state standards for width and length to accommodate emergency access ingress and egress. Consider requiring new development adjacent to existing single access neighborhoods to connect to the single access neighborhoods and provide an additional access point.
    - **Policy 6.3: Improve Response Times.** Monitor for and work to resolve extended response time problems, as necessary, by increasing firefighting and support staff police resources, reviewing and conditioning annexations and development applications, and requiring funding of new services from fees, assessments, or taxes as new subdivisions are developed.
    - **Policy 6.4: Public Education.** Continue to educate the public about the City's Emergency Operations Plan and Evacuation Plan for disaster events.
    - **Policy 6.5: Update Emergency Operations Plan.** Regularly update the Emergency Operations Plan to include an assessment of current emergency service and projected emergency service needs as described in the Fire and Police Department Strategic Plans, and goals or standards for emergency services training for City staff and volunteers.
    - **Policy 6.6: Continue to Evaluate Existing Evacuation Modeling and Protocols.** Identify alternative plans for evacuation depending upon the location and dynamics of the emergency and conduct traffic modeling to quantify travel times under various likely scenarios. Consider the adequacy of emergency access under a range of emergency scenarios, including proximity to existing fire services and the capacity of existing services.

Thus, this impact is considered **less than significant**.

APPENDIX A – VMT Calculations

2025 Baseline Vehicle Miles Traveled Analysis – City of Ventura

ID	Purpose	Productions	Attractions
1	Home-based Work	469,496	835,200
2	Home-based School	32,339	23,787
3	Home-based University	6,820	2,392
4	Home-based Shopping	111,834	401,385
5	Home-based Social-Recreational	109,372	325,217
6	Home-based Serve Passenger	79,774	324,871
7	Home-based Other	114,158	369,345
8	Work-Based Other	65,572	43,346
9	Other Based Other	218,756	194,863
	Total VMT	1,208,119	2,520,406
	Total Home-based VMT	923,791	
	Total Work-based VMT	900,772	
	Total Population	109,382	
	Total Employees	67,975	
	Total Home-based VMT/Capita	**8.45**	
	Total Work-based VMT/Employee	**13.25**	
	Total VMT/Service Population	**21.02**	

2025 Baseline Vehicle Miles Traveled Analysis –Ventura County

ID	Purpose	Productions	Attractions
1	Home-based Work	8,769,544	6,645,334
2	Home-based School	164,521	163,543
3	Home-based University	115,026	112,416
4	Home-based Shopping	1,560,915	1,596,642
5	Home-based Social-Recreational	2,379,184	2,439,897
6	Home-based Serve Passenger	1,206,547	1,234,508
7	Home-based Other	2,856,616	2,824,077
8	Work-Based Other	502,529	464,055
9	Other Based Other	1,956,999	1,889,334
	Total VMT	19,511,883	17,369,806
	Total Home-based VMT	17,052,355	
	Total Work-based VMT	7,147,863	
	Total Population	850,812	
	Total Employees	362,840	
	Total Home-based VMT/Capita	**20.04**	
	Total Work-based VMT/Employee	**19.70**	
	Total VMT/Service Population	**30.39**	

General Plan Update (2050) Vehicle Miles Traveled Analysis – City of Ventura

ID	Purpose	Productions	Attractions
1	Home-based Work	367,551	719,547
2	Home-based School	128,512	92,378
3	Home-based University	63,935	290
4	Home-based Shopping	141,298	330,197
5	Home-based Social-Recreational	119,878	198,756
6	Home-based Serve Passenger	103,645	233,943
7	Home-based Other	130,707	230,263
8	Work-Based Other	114,604	98,264
9	Other Based Other	300,808	253,639
	Total VMT	1,470,938	2,157,277
	Total Home-based VMT	1,055,526	
	Total Work-based VMT	834,151	
	Total Population	137,175	
	Total Employees	72,610	
	Total Home-based VMT/Capita	**7.69**	
	Total Work-based VMT/Employee	**11.49**	
	Total VMT/Service Population	**17.29**	