

## 4.12 TRANSPORTATION

This section analyzes the existing and planned transportation and circulation conditions for the modified Dana Point Harbor Hotels Project (Modified Project) and the surrounding area, and identifies circulation impacts that may result during, or subsequent to, the development of the Modified Project.

The analysis of the Modified Project contained in this section is based on the updated *Traffic Impact Analysis for the Dana Point Harbor Hotels Project, Dana Point, Orange County, California* (2025 Traffic Impact Analysis [TIA]) prepared for the Modified Project in March 2025, included as Appendix N to this Revised Draft EIR, and the *Dana Point Harbor Revitalization PA-3 Hotel Project Parking Assessment & Parking Management Plan* (2025 Parking Analysis) prepared for the Modified Project in February 2025, included as Appendix O to this Revised Draft EIR.

### 4.12.1 Scoping Process

#### 4.12.1.1 Original Project Scoping

The City of Dana Point (City) received eight comment letters during the public review period of the Initial Study/Notice of Preparation (IS/NOP). For copies of the IS/NOP comment letters, refer to Appendix B of this Revised Draft EIR. Three comment letters included comments related to transportation.

The letter from Orange County Transportation Authority (OCTA), received on October 26, 2020, suggested that in addition to an analysis of vehicle miles traveled (VMT) for impacts under the California Environmental Quality Act (CEQA), a level of service analysis should be included to address impacts to roadway segments and intersections included in the OCTA Congestion Management Program (CMP). The comment letter also requests the right-of-way necessary to build out Dana Point Harbor Drive consistent with the current four-lane designation of this roadway as Primary Arterial in the Orange County Master Plan of Arterial Highways (MPAH) (2020) be maintained. Refer to the analysis in Section 4.12.6 below for a discussion of the potential impacts related to LOS and VMT (Threshold 4.12.2). While the Modified Project includes landscaping and median improvements on Dana Point Harbor Drive, it does not include any changes to or encroachment upon the existing right-of-way limits for this roadway. The Modified Project neither widens Dana Point Harbor Drive nor would it preclude future buildout of Dana Point Harbor Drive to the four-lane designation included in the MPAH.

The letter from California Department of Transportation (Caltrans) District 12, received on October 26, 2020, requested that a Traffic Impact Analysis report be prepared for the Original Project, which should consider impacts to State Route 1 (SR-1) and Interstate 5 (I-5). The comment letter also requested that the 2021 Draft EIR discuss Multimodal Mobility Strategies encouraging coordination with OCTA for opportunities to enhance these strategies including prioritizing transit, bicycle, and pedestrian opportunities. Lastly, the comment letter requested an encroachment permit be obtained for any work within State right-of-way. Refer to the analysis provided in Section 4.12.6 below for a discussion of the Modified Project's consistency with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Threshold 4.12.1) and potential impacts on the local circulation system, including SR-1 and

I-5 (Threshold 4.12.2). The project site is located adjacent to Dana Point Harbor Drive, which provides a Class II bicycle lane, and within 0.13 mile of a Dana Point Trolley stop. The Modified Project includes development of a Pedestrian Promenade between the project site and the marina that also connects to the Commercial Core area of the Dana Point Harbor. The Modified Project would not require any work within State right-of-way requiring an encroachment permit.

The letter from the South Coast Water District (SCWD), received on October 26, 2020, suggested that temporary impacts to emergency access from construction along Island Way, Dana Point Harbor Drive, and Casitas Place be analyzed in the 2021 Draft EIR. Refer to the analysis provided in Section 4.12.6 below for a discussion of the Modified Project's consistency with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, which includes maintenance of emergency access during construction (Threshold 4.12.4).

#### 4.12.1.2 Modified Project Scoping

A Supplemental Notice of Preparation (NOP) for the Modified Project was circulated for public review from July 19, 2024, through August 19, 2024.

Copies of the Supplemental NOP and comment letters received in response to the Supplemental NOP are included within Appendix A of this Revised Draft EIR. One comment letter included comments related to transportation.

The letter from California Department of Transportation (Caltrans) District 12, received on August 19, 2024, requests that a Vehicle Miles Traveled (VMT)-based Traffic Impact Analysis report be prepared for the Modified Project, which should consider impacts to nearby State Highway System (SHS) facilities. The comment letter also requests that the Revised Draft EIR discuss multimodal transportation options and complete streets design features that prioritize transit, bicycle, and pedestrian opportunities. The comment also requests the inclusion of designated parking and unloading areas for delivery vehicles and strategic delivery timing. Lastly, the comment letter requests an encroachment permit be obtained for any work within State right-of-way. Refer to the analysis provided in Section 4.12.6 below for a discussion of the Modified Project's consistency with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Threshold 4.12.1) and potential impacts on the local circulation system, including SR-1 and I-5 (Threshold 4.12.2). The project site is located adjacent to Dana Point Harbor Drive, which provides a Class II bicycle lane, and is within 0.13 mile of a Dana Point Trolley stop. The Modified Project includes development of a Pedestrian Promenade between the project site and the marina that also connects to the Commercial Core area of the Dana Point Harbor. The Modified Project would not require any work within State right-of-way requiring an encroachment permit.

#### 4.12.2 Existing Environmental Setting

In its existing condition, the project site is currently developed with the Dana Point Marina Inn on the central portion of the project site and two boater services buildings with surface parking reserved for boaters on the southern portion of the project site. Access is currently provided to the project site from Dana Point Harbor Drive to the northeast and from Casitas Place to the east.

Access to the project site from the Street of the Golden Lantern is possible by traveling through the parking lot of the Commercial Core and via Casitas Place.

#### 4.12.2.1 Existing Circulation System

As shown on Figure 3.1, Regional Location Map, in Chapter 3.0, Project Description, regional access to the project site is provided by Pacific Coast Highway (PCH, also known as SR-1) and I-5. PCH runs in a northwest to southeast direction through the City and is located approximately 0.30 mile north of the project site. I-5 runs through the eastern portion of the City and is located approximately 1.3 mile northeast of the project site.

**Vehicular Circulation.** Key roadways in the vicinity of the project site include:

- **Pacific Coast Highway:** PCH is a City facility with a speed limit of 35 miles per hour (mph). It is a divided, east-west arterial highway near the project site. East of Crystal Lantern, PCH is a six-lane facility. Between Crystal Lantern and Copper Lantern, PCH consists of five lanes. West of Copper Lantern, PCH is a four-lane facility. It is designated as a Major Arterial Highway in the City's General Plan Circulation Element and the Orange County Master Plan of Arterial Highways (MPAH). It is also a CMP facility. Curbside parking is permitted on both sides of the highway in select locations.
- **Dana Point Harbor Drive:** Dana Point Harbor Drive is a divided four-lane roadway, which runs in an east-west direction located north of the project site. West of Casitas Place, Dana Point Harbor Drive is striped with one lane in the eastbound and westbound directions. The speed limit is 30 mph. It is designated as a Primary Arterial in the City's General Plan Circulation Element and Orange County MPAH.
- **Del Obispo Street:** Del Obispo Street is a divided four-lane roadway, which runs in a north-south direction located east of the project site. The speed limit is 40 mph. It is designated as a Secondary Arterial in the City's General Plan Circulation Element and Orange County MPAH. Curbside parking is permitted on both sides of the roadway in select locations.
- **Golden Lantern:** Golden Lantern is a divided four-lane roadway, which runs in a north-south direction located east of the project site. The speed limit is 35 mph north of Dana Point Harbor Drive and 25 mph south of Dana Point Harbor Drive. Golden Lantern is designated as a Primary Arterial based on the City's General Plan Circulation Element. The Orange County MPAH designates Golden Lantern as a Smart Street north of PCH and a Primary Arterial south of PCH. It is also a CMP facility. Curbside parking is permitted on both sides of the roadway in select locations.
- **Stonehill Drive:** Stonehill Drive is a four-lane, divided roadway, which runs in an east-west direction located north of the project site. It is designated as a Primary Arterial in the City's General Plan Circulation Element and Orange County MPAH. The posted speed limit is 40 mph. Curbside parking is permitted on both sides of the roadway in select locations.

**Pedestrian Circulation.** The project site currently includes internal pedestrian circulation, and walkways and sidewalks are provided along Casitas Place, Dana Point Harbor Drive, and Island Way. The sidewalk on Island Way also provides access to the rest of the marina to the west of the project site and the Dana Island portion of the Harbor located south of the project site across the Island Way bridge. The sidewalk along Dana Point Harbor Drive provides access to Dana Point Cove and Baby Beach to the west and to Doheny State Beach to the east.

**Bicycle Circulation.** The project site is located immediately south of the existing Class 2 bike lanes on Dana Point Harbor Drive.<sup>1</sup> An additional Class 2 bike lane is located on Golden Lantern, east of the project site. These existing bicycle facilities provide routes to employment, shopping, or recreational destinations within the Harbor and surrounding area.

**Transit Circulation.** The proposed hotels would also be located approximately 0.15 mile southwest of the nearest bus stop (the OCTA bus stop at the northeast corner of Golden Lantern and Dana Point Harbor Drive used by Bus Routes 1 and 90). In addition, the City of Dana Point provides a trolley service during the summer months for local city transport, and the proposed hotels are located approximately 0.13 mile west of the nearest trolley stop (on the southeast corner of Golden Lantern and Dana Point Harbor Drive). Employees of the Dana Point Harbor Hotels may utilize available alternative transportation to access the site.

#### 4.12.2.2 Original Project Existing Traffic Volumes and Level of Service Analysis

At the time the 2021 Draft EIR was prepared, the COVID-19 pandemic had disrupted typical travel patterns, and traffic data collected at this time would not have reflected typical conditions. Therefore, existing conditions were approximated from historic traffic data. The City provided the latest traffic volume data at the time for each intersection. At seven of those intersections, traffic volume data were collected in 2019 or early 2020 and reflected typical conditions of the time. At one intersection (Dana Point Harbor Drive/Park Lantern), 2018 traffic volume data were available during the weekday a.m. and p.m. peak hours and 2011 traffic volume data were available during the Saturday peak hour. At the remaining four intersections (all of which are located along Dana Point Harbor Drive), the latest available traffic volume data were collected in 2005. After reviewing traffic volume growth rates along Dana Point Harbor Drive, and in consultation with City staff, a 0.5 percent per year growth rate was applied to all traffic volumes collected in 2019 or prior.

#### 4.12.2.3 Modified Project Existing Traffic Volumes and LOS Analysis

An independent data collection company was contracted to collect updated intersection traffic volume data at the study intersections. These data were collected on Thursday, July 18, 2024, and Saturday, July 20, 2024. Existing traffic volume data gathered for this analysis are presented in Appendix A to the 2025 TIA (Appendix N of this Revised Draft EIR). These traffic volume data were compared to traffic volume data at the same intersections collected in 2019 and 2020 during non-summer months. The majority of the turn-movement volumes were similar in the current dataset, and some traffic movements were much higher due to summer tourist visits. At one intersection,

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<sup>1</sup> Orange County Transportation Authority (OCTA). 2009. *2009 Commuter Bikeways Strategic Plan*. Website: <https://octa.net/pdf/bikeways09.pdf> (accessed September 12, 2024).

Del Obispo Street/Stonehill Drive, the southbound right-turn and eastbound left-turn volumes were much lower in the a.m. peak hour for the current dataset compared to traffic volume data collected in January 2020 before the COVID-19 lockdown. These movements were similar in the p.m. peak hour and Saturday midday peak hour. Differences for these two movements only in the a.m. peak hour are most likely due to lower trip generation at a Montessori preschool located at the northwest corner of this intersection when current traffic volume data were collected. To compensate, the previously collected turn volume for these two movements at this intersection were added to the current a.m. peak-hour dataset.

Refer to Figure 2 of the 2025 TIA, Appendix N to this Revised Draft EIR, for a map of the study intersection locations in relation to the project site. Table 4.12.A below lists the study intersections and the existing level of service (LOS) performance of these intersections. LOS worksheets for the existing conditions are provided in Appendix B to the 2025 TIA. As Table 4.12.A shows, all study intersections operate within their LOS targets in the existing condition.

**Table 4.12.A: Existing Intersection LOS Summary**

Intersection	AM Peak Hour		PM Peak Hour		Saturday Midday	
	ICU/ Delay	LOS	ICU/ Delay	LOS	ICU/ Delay	LOS
1. Island Way/Dana Point Harbor Dr.	11.5 sec	B	14.5 sec	B	18.5 sec	C
2. Casitas Place/Dana Point Harbor Dr.	0.246	A	0.422	A	0.421	A
3. Golden Lantern/PCH (CMP)	0.542	A	0.637	B	0.683	B
4. Golden Lantern/Del Prado Ave. (CMP)	0.257	A	0.346	A	0.412	A
5. Golden Lantern/Dana Point Harbor Dr.	0.308	A	0.405	A	0.522	A
6. Puerto Place/Dana Point Harbor Dr.	0.247	A	0.306	A	0.393	A
7. Dana Point Harbor Dr./Park Lantern	0.296	A	0.483	A	0.526	A
8. Del Obispo St.-Dana Point Harbor Dr./PCH	0.548	A	0.634	B	0.658	B
9. Del Obispo St./Stonehill Dr.	0.606	B	0.616	B	0.668	B
10. Camino Capistrano/Stonehill Dr.	0.528	A	0.677	B	0.828	D
10. Camino Capistrano/Stonehill Dr. (HCM)	20.8 sec	C	28.7 sec	C	33.3 sec	C
11. I-5 SB Ramps/Camino Las Ramblas	0.223	A	0.317	A	0.299	A
11. I-5 SB Ramps/Camino Las Ramblas (HCM)	0.6 sec	A	0.7 sec	A	0.7 sec	A
12. I-5 NB Ramps/Camino Las Ramblas	0.160	A	0.240	A	0.213	A
12. I-5 NB Ramps/Camino Las Ramblas (HCM)	7.4 sec	A	6.5 sec	A	6.1 sec	A

Source: LSA (2025).

Unsatisfactory LOS

CMP = Congestion Management Program

I-5 = Interstate 5

HCM = Highway Capacity Manual

ICU = intersection capacity utilization

LOS = level of service

NB = northbound

PCH = Pacific Coast Highway

SB = southbound

### 4.12.3 Regulatory Setting

#### 4.12.3.1 Federal Regulations

No federal policies or regulations pertaining to transportation are applicable to the Modified Project.

#### 4.12.3.2 State Regulations

**Senate Bill 743.** On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that changes the methodology of a transportation impact analysis as part of CEQA requirements. SB 743 directed the Governor's Office of Planning and Research (OPR) to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis. Rather, vehicle miles travelled (VMT), or other measures that promote "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses," are now used as the basis for determining significant transportation impacts in the State.

**State CEQA Guidelines Section 15064.3, Subdivision (b).** In January 2018, the State of California Governor's Office of Planning and Research (OPR) submitted a proposal for comprehensive updates to the *State CEQA Guidelines* to the California Natural Resources Agency. The submittal included proposed updates related to the analysis of greenhouse gas (GHG) emissions, energy, transportation impacts pursuant to SB 743, and wildfires, as well as revisions to Section 15126.2(a) in response to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369. On December 28, 2018, the updated *State CEQA Guidelines* went into effect. As part of the update to the *State CEQA Guidelines*, Section 15064.3 was added and codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3), qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT.

#### 4.12.3.3 Regional Regulations

**Orange County Congestion Management Program.** The Orange County Transportation Authority (OCTA) is a multimodal transportation agency that began in 1991 with the consolidation of seven separate agencies. OCTA serves Orange County residents and travelers by providing the following: countywide bus and paratransit service; Metrolink rail service; the 91 Express Lanes; freeway, street, and road improvement projects; individual and company commuting solutions; motorist aid services; and regulation of taxi operations. State law requires that a Congestion Management Program (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government within that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP. The OCTA adopted the CMP in 1991 to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions in

Orange County. Compliance with the CMP requirements ensures a city's eligibility to compete for State gas tax funds for local transportation projects.

#### 4.12.3.4 Local Regulations

##### City of Dana Point General Plan.

**Circulation Element.** The Circulation Element of the City of Dana Point General Plan (1995) guides the development of the City's circulation system in a manner that supports the citywide objectives of the General Plan. It addresses the circulation improvements needed to relieve traffic congestion due to future land uses, and establishes a hierarchy of transportation routes with specific development standards described for each category of roadway. There are six categories in the hierarchy, ranging from higher capacity "Major", "Augmented Primary", "Primary", "Secondary" arterials, to "Collector" and "Local" streets with the lowest capacity. This element also provides performance criteria in the form of Level of Service (LOS). The City has established LOS D as the threshold or lowest acceptable level of state highways and major arterials, and LOS C as the threshold for primary, second, and local arterials. The applicable goals and policies included in the Circulation Element, listed below, emphasize the importance of developing a circulation system that is capable of serving both existing and future residents while preserving community values and character.

**Goal 1:** Provide a system of streets that meets the needs of current and future residents and facilitates the safe and efficient movement of people and good throughout the City. (Coastal Act, Section 30250)

**Policy 1.9:** Limit driveway access on arterial streets to maintain a desired quality of flow.

**Policy 1.11:** Require that proposals for major new developments include a future traffic impact analysis which identifies measures to mitigate any identified project impacts. (Coastal Act, Section 30250)

**Policy 1.13:** Minimize pedestrian and vehicular conflicts. (Coastal Act, Section 30252)

**Goal 5:** Encourage non-motorized transportation, such as bicycle and pedestrian circulation.

**Policy 5.2:** Maintain existing pedestrian facilities and encourage new development to provide pedestrian walkways between developments, schools and public facilities.

**Policy 5.3:** Ensure accessibility of pedestrian facilities to the elderly and disabled.

**Policy 5.12:** Provide for a non-vehicular circulation system that encourages mass-transit, bicycle transportation, pedestrian circulation. (Coastal Act, Sections 30252 and 30253)

**Goal 6:** Provide for well-designed and convenient parking facilities.

**Policy 6.1:** Consolidate parking, where appropriate, to reduce the number of ingress and egress points onto arterials.

**Policy 6.4:** Encourage the use of shared parking facilities, such as through parking districts or other mechanisms.

**Conservation/Open Space Element.** The City's General Plan Conservation/Open Space Element (July 9, 1991) establishes goals and policies aimed at preserving and improving public and private facilities to increase the livability of the City for its residents. The following policy presented in the General Plan Conservation/Open Space Element is applicable to the Modified Project:

**Policy 5.1:** Design safe and efficient vehicular access to streets to ensure efficient vehicular ingress and egress. (Coastal Act, Section 30252)

**Land Use Element.** The City's General Plan Land Use Element (August 26, 1997) establishes goals and policies aimed at directing growth to maintain the quality of life within the City. The following policy presented the Land Use Element is applicable to the Modified Project:

**Policy 1.8:** The location and amount of new development should maintain and enhance public access to the coast by facilitating the provision or extension of transit service, providing non-automobile circulation within the development, providing adequate parking facilities or providing substitute means of serving the development with public transportation, and assuring the potential for public transit for high intensity uses. (Coastal Act, Section 30252)

**Local Coastal Program (LCP).** The Dana Point Harbor Revitalization Plan and District Regulations (DPHRP&DR) were certified by the California Coastal Commission on October 6, 2011. The Dana Point Harbor Revitalization Plan (DPHRP) includes policies aimed at achieving the California Coastal Act's goals for the protection of coastal resources through the location of new development. Because Dana Point Harbor is presently completely built-out, all new development, including the Modified Project, will occur in the form of replacement or in-fill development projects.

**Policy 5.2.1-10:** The hotel building design shall provide adequate parking for guests and free parking for hotel employees, as well as maintaining convenient access to parking areas for boaters, consistent with off-street parking standards and regulations set forth in Chapter 14 of the Dana Point Harbor Revitalization Plan & District Regulations.

**Policy 5.2.1-11:** A parking deck with access directly from Dana Point Harbor Drive, Casitas Place or the Commercial Core area may be considered as part of the overall hotel design to separate the main guest entrances from service and delivery functions.

**Policy 6.2.1-1:** Promote Harbor improvements that are designed in a manner that: (1) facilitates provision or extension of transit service; (2) provides on-site commercial and recreational facilities to discourage mid-day travel; and (3) provides non-automobile circulation to and within the Harbor. (Coastal Act, Sections 30213 and 30252)

**Policy 6.2.1-5:** Bike racks shall be incorporated into the design of the Harbor wherever feasible.



**Policy 6.2.3-1:** Coordinate with appropriate City and County Park, Recreation and Harbor agencies to enhance Open Space trails and bike paths.

**Policy 6.2.3-3:** Maintain existing pedestrian facilities and require new development to provide pedestrian walkways between facilities.

**Policy 6.2.3-5:** Develop stronger pedestrian, bicycle and visual linkages between public spaces and along the shoreline and bluffs.

**Policy 6.2.3-6:** Support and coordinate the development and maintenance of bikeways in conjunction with the County of Orange Master Plan of Countywide Bikeways to assure that local bicycle routes will be compatible with routes of neighboring jurisdictions.

**Policy 6.2.4-1:** All parking facilities shall be designed to include safe and secure parking for bicycles.

**Policy: 8.6.8-3:** OC Dana Point Harbor shall confirm the following items are included as part of development design: Emergency access shall be maintained during construction.

**Dana Point Harbor Revitalization Plan and District Regulations (DPHRP&DR).** Part II, Chapter 14, Off-Street Parking Standards and Regulations, of the DPHRP&DR provides parking requirements for development projects within Dana Point Harbor. Since the Modified Project involves the demolition of the existing Marina Inn and development of two hotels on the project site, each of which will require adequate parking, the Modified Project is subject to the requirements of Chapter 14 of the DPHRP&DR. As the project site currently includes boater service facilities and designated boater parking areas serving nearby boat slips, the Modified Project would also include boater service facilities within one of the hotels; parking for boater service facilities and designated boater parking will also be required as part of the Modified Project.

#### 4.12.4 Methodology

The 2025 TIA and the analysis in this section have been prepared consistent with the objectives and requirements of the City of Dana Point General Plan Circulation Element (1995), the Orange County Congestion Management Program (CMP) (2023), and applicable provisions of the California Environmental Quality Act (CEQA), including disclosure of vehicle level of service impacts in both existing and cumulative horizon years and the project's potential effect on vehicle miles traveled.

##### 4.12.4.1 Intersection Level of Service Methodology

Traffic (Version 8.0 R1) computer software was utilized to determine the study intersection levels of service (LOS) based on the intersection capacity utilization (ICU) methodology for signalized intersections. Consistent with the City's requirements, the ICU methodology compares the volume-to-capacity (v/c) ratios of conflicting turn movements at an intersection, sums up these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. The resulting ICU is expressed in terms of LOS, where LOS A represents free-flow activity and LOS F represents overcapacity operation. LOS is a qualitative assessment of the quantitative effects of such factors as

traffic volume, roadway geometrics, speed, delay, and maneuverability on roadway and intersection operations. Typical intersection operations by LOS grade are described below in Table 4.12.B.

**Table 4.12.B: Level of Service Methodology**

Level of Service	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized, and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally, drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is attained no matter how great the demand.
F	This level describes forced-flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream.

According to the City of Dana Point General Plan Circulation Element (1995), signalized intersections in Dana Point are evaluated using the ICU methodology. The ICU methodology for signalized intersections compares the v/c ratios of conflicting turn movements at an intersection, sums up these critical conflicting v/c ratios for each intersection approach, and determines the overall ICU. The resulting ICU is expressed in terms of level of service (LOS), where LOS A represents free-flow activity and LOS F represents overcapacity operation, as shown in Table 4.12.C, below.

**Table 4.12.C: Volume/Capacity Ratio Methodology**

Level of Service	Volume-to-Capacity (ICU Methodology)
A	≤0.60
B	>0.60 and ≤0.70
C	>0.70 and ≤0.80
D	>0.80 and ≤0.90
E	>0.90 and ≤1.00
F	>1.00

ICU = intersection capacity utilization

The Highway Capacity Manual (HCM) 6th Edition (TRB 2017) methodology, as calculated using Synchro software, was used to determine intersection LOS at unsignalized study intersections. For the HCM methodology, the LOS is presented in terms of delay (in seconds per vehicle). The relationship between LOS and the delay at unsignalized intersections is shown in Table 4.12.D, below.

**Table 4.12.D: Highway Capacity Manual Methodology**

Level of Service	Signalized Intersection Delay (seconds) per Vehicle	Unsignalized Intersection Delay (seconds) per Vehicle
A	≤10.0	≤10.0
B	>10.0 and ≤20.0	>10.0 and ≤15.0
C	>20.0 and ≤35.0	>15.0 and ≤25.0
D	>35.0 and ≤55.0	>25.0 and ≤35.0
E	>55.0 and ≤80.0	>35.0 and ≤50.0
F	>80.0	>50.0

**4.12.4.2 City of Dana Point Thresholds of Significance**

As described above, the City of Dana Point General Plan Circulation Element (1995) provides performance criteria in the form of LOS. The City has established LOS D as the threshold or lowest acceptable level of state highways and major arterials, and LOS C as the threshold for primary, second, and local arterials. A project would be considered to degrade roadway performance in Dana Point if a project causes a change in LOS from satisfactory to unsatisfactory, or if a project causes an increase in the v/c or ICU of 0.01 or more, causing or worsening an unsatisfactory LOS. Table 4.12.E, below, lists the study intersections, the roadway classification of each intersection on the Master Plan Circulation System, and its associated LOS target according to Table C-3 of the City of Dana Point General Plan Circulation Element.

**Table 4.12.E: Study Intersection Level of Service Targets**

Intersection	Classification	LOS Target
1. Island Way/Dana Point Harbor Dr.	Primary	C
2. Casitas Place/Dana Point Harbor Dr.	Primary	C
3. Golden Lantern/PCH	CMP	E
4. Golden Lantern/Del Prado Ave.	CMP	E
5. Golden Lantern/Dana Point Harbor Dr.	Primary	C
6. Puerto Place/Dana Point Harbor Dr.	Primary	C
7. Dana Point Harbor Dr./Park Lantern	Primary	C
8. Del Obispo St.-Dana Point Harbor Dr./PCH	Primary	C
9. Del Obispo St./Stonehill Dr.	Primary	C
10. Camino Capistrano/Stonehill Dr.	Major	D
11. I-5 SB Ramps/Camino Las Ramblas	Freeway	D
12. I-5 NB Ramps/Camino Las Ramblas	Freeway	D

Source: *Traffic Impact Analysis for the Dana Point Harbor Hotels Project* (LSA 2025).  
 CMP = Congestion Management Program      NB = northbound  
 I-5 = Interstate 5      PCH = Pacific Coast Highway  
 LOS = level of service      SB = southbound

**4.12.4.3 City of San Juan Capistrano Thresholds of Significance**

Two study intersections are located within the City of San Juan Capistrano. For those two intersections (Camino Capistrano/Stonehill Drive and I-5 Northbound Ramps/Camino Las Ramblas), level of service is reported according to both Dana Point and San Juan Capistrano analysis guidelines.

Per City of San Juan Capistrano Administrative Policy No. 310, intersections are evaluated using both the intersection capacity utilization (ICU) and *Highway Capacity Manual* (HCM), 6<sup>th</sup> Edition (TRB 2017) methodologies. The City of San Juan Capistrano considers LOS D as the upper limit of satisfactory operations for intersections. Based on City of San Juan Capistrano Administration Policy No. 310, a project impact occurs at a non-hot-spot intersection (or roadway segment) when the project's increase in ICU (or v/c ratio) is 0.01 or greater and the resulting LOS is E or F (ICU methodology). A project impact also occurs at a non-hot-spot intersection when the project's increase in delay is 1.0 second or greater and the resulting LOS is E or F (HCM methodology). Neither of the study intersections within San Juan Capistrano is a hot spot location.

#### 4.12.4.4 Congestion Management Program

OCTA is the designated Congestion Management Agency responsible for preparing the Orange County CMP in compliance with Proposition 111 passed in June 1990. The 2023 Orange County CMP states that a TIA is required for CMP purposes for development projects generating 2,400 or more daily trips or for projects generating 1,600 or more daily trips and taking direct access to the CMP Highway System. The 2023 Orange County CMP stipulates the requirements for maintaining LOS E at CMP intersections or that the project will not result in a cumulative increase of more than 0.10 in the v/c ratio if the established LOS standard is worse than LOS E.

#### 4.12.5 Thresholds of Significance

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The Modified Project may be deemed to have a significant impact with respect to transportation if it would:

**Threshold 4.12.1:** Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

**Threshold 4.12.2:** Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).

**Threshold 4.12.3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

**Threshold 4.12.4:** Result in inadequate emergency access.

The Initial Study prepared for the Original Project in September 2020, included as Appendix B to this Revised Draft EIR, substantiated that there would be a less than significant impact associated with Threshold 4.12.3. Under the Original Project, access to the project site would be provided via Dana Point Harbor Drive on the northwest boundary of the project site and Casitas Place on the eastern boundary of the project site. The site plan for the Original Project also included internal circulation routes for guests of each hotel and designated boater parking areas as well as sidewalks for pedestrian circulation. There were also truck traffic routes and delivery truck locations (delivery truck location on west side of Island Way removed in the Modified Project) within the limits of the Original Project but located in the adjacent Island Way and Casitas Place rights-of-way. The Modified Project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. Design of the proposed circulation would be

subject to review by the City's Public Works & Engineering Services at entitlement for compliance with City regulations, and by the County of Orange for necessary ministerial permits to ensure there are no design features that would result in traffic safety impacts. The Modified Project proposes virtually the same circulation improvements identified under the Original Project and would also be subject to review by the City's Public Works & Engineering Services and the County of Orange. As such, the conclusions of the Initial Study prepared for the Original Project remain the same for the Modified Project. This threshold will not be addressed in the following analysis.

The Initial Study prepared for the Original Project also substantiated that impacts associated with Threshold 4.12.4 would also be less than significant. However, in order to be responsive to a comment from South Coast Water District (SCWD) received during the scoping period for the Original Project, this threshold was addressed in the 2021 Draft EIR and is further discussed below (refer to Threshold 4.12.4, below).

#### 4.12.6 Project Impacts

**Threshold 4.12.1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**Less Than Significant Impact.** The Modified Project would be required to comply with General Plan and DPHRP&DR policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Modified Project would also be required to comply with the City's transportation-related goals, policies, and metrics for determining traffic impacts, as well as the Orange County *Congestion Management Program (CMP) (202)* and the *Transportation Demand Management Plan for the Dana Point Harbor Revitalization Plan* (Walker Parking Consultants, 2013).

**Construction..** As described in Chapter 3.0, Project Description, construction equipment and vehicles will be staged on site. Although the Modified Project does not include any characteristics (e.g., permanent road closure or long-term blocking of road access) that would physically impair or otherwise interfere with transit, roadways, bicycle facilities, and/or pedestrian facilities in the project vicinity, construction of the Modified Project may require temporary lane closures on Dana Point Harbor Drive, Island Way, and Casitas Place to allow for utility connections as well as sidewalk, gutter, and driveway improvements. The DPHRP&DR includes several provisions and policies related to construction phasing and access, and compliance with these regulations will be required as part of the Coastal Development Permit and project approval. Any construction-related temporary lane closures or traffic control, including transit, bicycle, and pedestrian, would comply with the policies and provisions contained in the DPHRP&DR, as described in Standard Condition 4.12-1 (SC 4.12-1) below. Per SC 4.12-1, the Modified Project will be subject to review, approval, and inspection by the County of Orange to ensure that no impacts would occur. Compliance with SC 4.12-1 would ensure compliance with the DPHRP&DR, which is incorporated by reference as Chapter 9.25 of the Dana Point Zoning Code and therefore also in compliance with the City's land use regulations and Zoning Ordinance, and no conflicts with adopted plans or policies would occur. Implementation of SC 4.12-1 would also ensure traffic controls are implemented during

construction to ensure emergency access is maintained during construction, consistent with Land Use Policy 8.6.8-3 of the DPHRP, Dana Point Harbor Fire Policies.

Furthermore, construction of the Modified Project would occur for approximately 32 months. During project construction, the number of worker and truck trips per day is anticipated to be fewer than during project operations, which were expected to generate approximately 1,104 net new daily vehicle trips (or 2,394 total trips minus the number of existing trips associated with the existing Dana Point Marina Inn). Although construction trip generation would be significantly less than the net trip generation of the Modified Project, which is determined below to be less than significant, construction traffic impacts could result in traffic delays and detours.

As described above, in order to ensure that traffic impacts associated with construction activities and damage along haul routes are minimized, the Modified Project would be required to comply with SC 4.12-1, which requires the Project Applicant to comply with the policies of the DPHRP&DR that include preparation and compliance with a Construction Management Plan for the Modified Project. Compliance with SC 4.12-1 and the Construction Management Plan also require the Project Applicant's Construction Contractor to keep all haul routes used during the demolition and site preparation phases clean and free of debris and repair any damage to existing pavement, streets, curbs, or gutters along such routes. With implementation of SC 4.12-1, traffic impacts due to construction delivery and haul trips would be less than significant.

In addition, due to the existing parking on the project site, construction of the Modified Project could temporarily impact parking, specifically for boaters. Although the impacts to parking during construction activities would be temporary in duration, as part of the Coastal Development Permit (CDP) Application, the Project Applicant must prepare and submit a Construction Staging Plan in accordance with the requirements of the Dana Point Harbor District Regulations (DPHDR) Section 16.4 e) (Applications). This plan has been referred to as a Construction Phasing and Construction Management Parking Plan in previous projects associated with the Dana Point Harbor, to account for additional provisions of the DPHDR related to the temporary loss of parking during construction, specifically Special Provision 3—Construction Phasing. The Construction Phasing and Construction Management Parking Plan is reviewed as part of the CDP Application and is included as part of the documents considered when the City acts on the CDP. The Construction Phasing and Construction Management Parking Plan will comply with the provisions and policies of the DPHRP&DR related to construction impacts on parking within the Harbor by minimizing disruption of parking availability and ensuring that access to designated boater parking areas is maintained during all construction phases to the greatest extent feasible. DPHRP regulations also require that any temporary parking loss during construction of the Modified Project shall be replaced prior to its removal and shall be located in reasonable proximity to the uses it serves to the maximum extent feasible. The City-approved Construction Phasing and Construction Management Parking Plan will be included with plans and materials submitted to the County as part of any ministerial permits after the City takes action on the CDP for the Modified Project. Therefore, through implementation of a Construction Phasing and Construction Management Parking Plan

approved during the City's CDP processing, parking impacts due to construction would be less than significant.

**Operation..** The existing Dana Point Marina Inn contains 136 guest rooms with limited amenities. Based on the current price of guest rooms, this hotel is classified as a lower cost overnight accommodation. Existing portions of the project site south of the Dana Point Marina Inn include boater service buildings with shower and laundry facilities, and designated boater parking areas. These portions of the project site would be demolished in their entirety as part of the Modified Project.

The Modified Project would construct two hotels, including space for boater services (i.e., showers, lockers, laundry, and vending machines) in one of the hotels, and designated boater parking allocated to Planning Area 3 for some of the boat slips in the East Cove Marina. Dana House Hotel is planned as a boutique hotel and would contain 130 market-rate rooms. Surf Lodge would consist of 169 affordable rooms in a standard hotel configuration. Amenities frequently included in hotels (such as restaurants, lounges, accessory retail space, pool, and recreational center) would be included in the two proposed hotels.

Because both the existing condition and Modified Project contain boater amenities and services, the net effect on the project trip generation with respect to trips related solely to using boater amenities and services would be negligible. Boater parking is addressed in the parking discussion below. Trip rates for the one existing and two proposed hotels were queried from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11<sup>th</sup> Edition. Daily, a.m. peak-hour, p.m. peak-hour, and weekend peak-hour trip rates were also calculated.

The trip rates and resulting trip generation calculations associated with the Modified Project are shown in Table 4.12.F, below. Table 4.12.F applies a conservative 10 percent internal trip capture estimate. Other measures to incentivize or facilitate alternatives to automobile travel that may be adopted by the Modified Project may further reduce the trip generation, but no further reduction is applied beyond the conservative 10 percent accounting for internal trip capture. As shown in Table 4.12.F, the Modified Project would generate approximately 1,104 net new daily vehicle trips, 60 a.m. peak-hour trips, 76 p.m. peak-hour trips, and 95 Saturday peak hour trips.

Trips associated with the Modified Project were distributed according to existing travel patterns and access to regional transportation networks. Project trip assignment followed the shortest travel paths. It should be noted that the access driveway for Surf Lodge provides right-in/right-out access only. Inbound trips for Surf Lodge could proceed westbound on Dana Point Harbor Drive until the turn-around located near Baby Beach. However, many patrons of Surf Lodge are likely to opt for the shorter route of making a U-turn at Island Way/Dana Point Harbor Drive. Project trips were added to the calculated existing traffic volumes.

**Table 4.12.F: Modified Project Trip Generation**

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour			Weekend Peak Hour		
				In	Out	Total	In	Out	Total	In	Out	Total
<b>Trip Rates</b>												
Existing Hotel <sup>1</sup>		Room	7.73	0.25	0.20	0.45	0.27	0.26	0.53	0.41	0.32	0.73
Boutique Hotel <sup>1</sup>		Room	7.58	0.25	0.19	0.44	0.27	0.26	0.53	0.41	0.33	0.74
Select Service Hotel <sup>1</sup>		Room	8.33	0.26	0.20	0.46	0.29	0.28	0.57	0.41	0.32	0.72
<b>Existing Use</b>												
Dana Point Marina Inn	136	Room	1,051	34	27	61	37	36	73	56	44	100
<b>Project Trip Generation</b>												
Dana House Hotel	130	Room	986	33	25	58	35	33	68	53	42	95
Surf Lodge	169	Room	1,408	44	33	77	49	48	97	69	53	122
Total Modified Project			2,394	77	58	135	84	81	165	122	95	217
Dana Point Harbor Internal Trip Capture <sup>2</sup>			(239)	(8)	(6)	(14)	(8)	(8)	(16)	(12)	(10)	(22)
<b>Net New External Trips</b>			<b>1,104</b>	<b>35</b>	<b>25</b>	<b>60</b>	<b>39</b>	<b>37</b>	<b>76</b>	<b>54</b>	<b>41</b>	<b>95</b>

Source: LSA (2025).

<sup>1</sup> Trip rates referenced from the ITE *Trip Generation Manual*, 11<sup>th</sup> Edition (ITE 2021) land use 310. A fitted-curve equation was used.

<sup>2</sup> Conservatively estimated at 10 percent, although a significant number of trips will likely be made within the Dana Point Harbor Complex.

ADT = average daily traffic (measured in trips)

ITE = Institute of Transportation Engineers

Table 4.12.G below compares the LOS analysis results for existing and existing plus Modified Project conditions. The results of the LOS analysis reflect U-turns at Island Way for access to Surf Lodge. As Table 4.12.G shows, all study intersections are anticipated to operate within their target LOS with the addition of traffic under the Modified Project.

As described in Chapter 3.0, Project Description, of this Revised Draft EIR, construction of both hotels under the Modified Project is anticipated to be completed in 2028. As such, 2028 is considered the Opening Year for the Modified Project. Table 4.12.H below compares the LOS analysis results for Opening Year (2028) conditions with and without the Modified Project.

The City anticipates that an intersection improvement project at Golden Lantern/Dana Point Harbor Drive will be completed by the Opening Year. The intersection improvement project consists of restriping the northbound and southbound approaches to provide one left-turn lane, one through lane, and one through/right-turn lane and removing northbound and southbound right-turn overlap signal phasing. This intersection improvement project was included as a cumulative project when intersection LOS was calculated. In addition, this analysis considers the effect of a planned roadway improvement project as part of the Ganahl Lumber Development Project, known as the Stonehill Drive Improvement Project. The project would construct a third eastbound through lane on Stonehill Drive between Del Obispo Street and Camino Capistrano. Because the Stonehill Drive Improvement Project is not currently fully funded, Table 4.12.H below provides intersection LOS calculations without and with the Stonehill Drive Improvement Project.



**Table 4.12.G: Existing and Existing Plus Project Intersection Level of Service Summary**

Intersections	Existing						Existing Plus Modified Project					
	AM Peak Hour		PM Peak Hour		Saturday Midday		AM Peak Hour		PM Peak Hour		Saturday Midday	
	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS
1. Island Way/Dana Point Harbor Dr.	11.5 sec	B	14.5 sec	B	18.5 sec	C	12.0 sec	B	15.1 sec	C	21.2 sec	C
2. Casitas Pl/Dana Point Harbor Dr.	0.246	A	0.422	A	0.421	A	0.271	A	0.440	A	0.444	A
3. Golden Lantern/PCH (CMP)	0.542	A	0.637	B	0.683	B	0.546	A	0.641	B	0.689	B
4. Golden Lantern/Del Prado Ave. (CMP)	0.257	A	0.346	A	0.412	A	0.265	A	0.351	A	0.425	A
5. Golden Lantern/Dana Point Harbor Dr.	0.308	A	0.405	A	0.522	A	0.319	A	0.419	A	0.539	A
6. Puerto Place/Dana Point Harbor Dr.	0.247	A	0.306	A	0.393	A	0.252	A	0.313	A	0.401	A
7. Dana Point Harbor Dr./Park Lantern.	0.296	A	0.483	A	0.526	A	0.304	A	0.491	A	0.536	A
8. Del Obispo St.-Dana Point Harbor Dr./PCH	0.548	A	0.634	B	0.658	B	0.554	A	0.641	B	0.666	B
9. Del Obispo St./Stonehill Dr.	0.606	B	0.616	B	0.668	B	0.607	B	0.618	B	0.670	B
10. Camino Capistrano/Stonehill Dr. (HCM)	0.528	A	0.677	B	0.828	D	0.529	A	0.677	B	0.828	D
Camino Capistrano/Stonehill Dr. (HCM)	20.8 sec	C	28.7 sec	C	33.3 sec	C	20.8 sec	C	28.7 sec	C	33.4 sec	C
11. I-5 SB Ramps/Camino Las Ramblas	0.223	A	0.317	A	0.299	A	0.225	A	0.319	A	0.302	A
I-5 SB Ramps/Camino Las Ramblas (HCM)	0.6 sec	A	0.7 sec	A	0.7 sec	A	0.6 sec	A	0.7 sec	A	0.8 sec	A
12. I-5 NB Ramps/Camino Las Ramblas	0.160	A	0.240	A	0.213	A	0.160	A	0.240	A	0.213	A
I-5 NB Ramps/Camino Las Ramblas (HCM)	7.4 sec	A	6.5 sec	A	6.1 sec	A	7.4 sec	A	6.5 sec	A	6.0 sec	A

Source: *Traffic Impact Analysis for the Dana Point Harbor Hotels Project* (LSA 2025).

- Unsatisfactory LOS
- CMP = Congestion Management Program
- HCM = Highway Capacity Manual
- I-5 = Interstate 5
- ICU = intersection capacity utilization
- LOS = level of service
- NB = northbound
- PCH = Pacific Coast Highway
- SB = southbound
- sec = seconds

**Table 4.12.H: Opening Year (2028) Plus Project Intersection Level of Service Summary**

Intersections	Opening Year (2028) No Project						Opening Year (2028) Plus Modified Project					
	AM Peak Hour		PM Peak Hour		Saturday Midday		AM Peak Hour		PM Peak Hour		Saturday Midday	
	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS	ICU / Delay	LOS
1. Island Way/Dana Point Harbor Dr.	11.7 sec	B	15.0 sec	C	19.2 sec	C	12.2 sec	B	15.6 sec	C	23.2 sec	C
2. Casitas Pl/Dana Point Harbor Dr.	0.411	A	0.603	B	0.752	C	0.424	A	0.621	B	0.772	C
3. Golden Lantern/PCH (CMP)	0.605	B	0.717	C	0.766	C	0.609	B	0.721	C	0.771	C
4. Golden Lantern/Del Prado Ave. (CMP)	0.336	A	0.425	A	0.585	A	0.344	A	0.435	A	0.598	A
5. Golden Lantern/Dana Point Harbor Dr.	0.427	A	0.550	A	0.767	C	0.438	A	0.563	A	0.785	C
6. Puerto Place/Dana Point Harbor Dr.	0.276	A	0.348	A	0.469	A	0.282	A	0.355	A	0.477	A
7. Dana Point Harbor Dr./Park Lantern.	0.333	A	0.542	A	0.629	B	0.340	A	0.551	A	0.638	A
8. Del Obispo St.-Dana Point Harbor Dr./PCH	0.597	A	0.695	B	0.749	C	0.603	B	0.702	C	0.757	C
9. Del Obispo St./Stonehill Dr.	0.656	B	0.693	B	0.747	C	0.657	B	0.694	B	0.756	C
Del Obispo St./Stonehill Dr. <sup>1</sup>	0.568	A	0.693	B	0.717	C	0.569	A	0.694	B	0.726	C
10. Camino Capistrano/Stonehill Dr. (HCM)	0.552	A	0.729	C	0.892	D	0.552	A	0.729	C	0.892	D
Camino Capistrano/Stonehill Dr. (HCM)	21.9 sec	C	28.6 sec	C	37.4 sec	D	22.1 sec	C	28.6 sec	C	37.4 sec	D
11. I-5 SB Ramps/Camino Las Ramblas	0.262	A	0.349	A	0.346	A	0.267	A	0.352	A	0.348	A
I-5 SB Ramps/Camino Las Ramblas (HCM)	0.7 sec	A	0.8 sec	A	0.9 sec	A	0.7 sec	A	0.8 sec	A	0.9 sec	A
12. I-5 NB Ramps/Camino Las Ramblas	0.209	A	0.283	A	0.302	A	0.214	A	0.289	A	0.310	A
I-5 NB Ramps/Camino Las Ramblas (HCM)	6.3 sec	A	6.3 sec	A	5.8 sec	A	6.2 sec	A	6.3 sec	A	5.8 sec	A

Source: *Traffic Impact Analysis for the Dana Point Harbor Hotels Project* (LSA 2025).

<sup>1</sup> Includes the planned, but not yet fully funded addition of a third eastbound through lane on Stonehill Drive anticipated as part of the Ganahl Lumber Development Project.

☐ = Unsatisfactory LOS

CMP = Congestion Management Program

HCM = Highway Capacity Manual

I-5 = Interstate 5

ICU = intersection capacity utilization

LOS = level of service

NB = northbound

PCH = Pacific Coast Highway

SB = southbound

sec = seconds

As Table 4.12.H shows, all study intersections are anticipated to continue to operate within their LOS target with the addition of cumulative Modified Project traffic. An ambient growth rate of 0.5 percent per year (2 percent total) was applied in order to project conditions in the year 2028. A list of approved and pending projects, provided in Chapter 4.0 of this Revised Draft EIR, which could reasonably be assumed to be operating by the Modified Project opening year, were also considered for their contributions to traffic at the study intersections.

Based on the information presented in Tables 4.12.H and 4.12.I, the Modified Project would not result in unsatisfactory LOS at any of the study intersections under both existing conditions and Opening Year (2028) conditions. As such, the Modified Project would not result in an inconsistency with applicable plans and policies related to roadway performance. Impacts would be less than significant, and no mitigation is required.

**Table 4.12.I: Modified Project VMT Calculations**

OCTAM Model Output		Baseline Model
Daily VMT <sup>1</sup>		1,344
<b>Employees</b>		
Dana House Hotel		72
Hotel Rooms	130	
Employees per Room <sup>2</sup>	0.557	
Surf Lodge		22
Hotel Rooms	169	
Employees per Room <sup>3</sup>	0.133	
Total Employees		94 <sup>4</sup>
<b>VMT per Employee</b>		<b>14.3</b>
<b>Regional Average VMT per Employee<sup>5</sup></b>		<b>24.1</b>
<b>15 Percent Below Regional Average</b>		<b>20.5</b>

Source: *Traffic Impact Analysis for the Dana Point Harbor Hotels Project* (LSA 2025).

- <sup>1</sup> Orange County Transportation Analysis Model (OCTAM) Home-Based-Work Trip VMT (i.e., VMT traveling between a person’s home and their work)
  - <sup>2</sup> Comparison of ITE *Trip Generation Manual* trips/room and trips/employee rates for Land Use 310, Hotel
  - <sup>3</sup> Comparison of ITE *Trip Generation Manual* trips/room and trips/employee rates for Land Use 320, Motel
  - <sup>4</sup> This value matches employee estimates from OCTAM and the ITE *Trip Generation Manual* and presents a more conservative analysis than applying a higher estimated number of employees identified in the project’s parking analysis
  - <sup>5</sup> *Guidelines for Evaluating Vehicle Miles Traveled Under CEQA for the County of Orange* (County of Orange 2020)
- ITE = Institute of Transportation Engineers  
VMT = vehicle miles traveled

**Congestion Management Program..** The Orange County CMP stipulates the requirements for maintaining LOS E at CMP intersections. Tables 4.12.H and 4.12.I include the LOS results for the two CMP intersections within the study area, Golden Lantern/PCH and Golden Lantern/Del Prado Avenue. As Tables 4.12.H and 4.12.I show, both CMP intersections are anticipated to operate at LOS E or better and would not be degraded by the addition of traffic associated with the Modified Project. Therefore, the Modified Project would not result in an inconsistency with applicable plans and policies addressing roadway performance. Impacts would be less than significant, and no mitigation is required.

**Caltrans Facilities..** Tables 4.12.H and 4.12.I include the LOS results for the three intersections operated by Caltrans within the study area, Camino Capistrano/Stonehill Drive, I-5 southbound

ramps/Camino Las Ramblas, and I-5 northbound ramps/Camino Las Ramblas. As Tables 4.12.H and 4.12.I show, all three Caltrans intersections are anticipated to operate within their LOS targets and would not be degraded by the addition of traffic associated with the Modified Project. Therefore, the Modified Project would not result in an inconsistency with applicable plans and policies addressing roadway performance. Impacts would be less than significant, and no mitigation is required.

**Parking.** Based on the analysis provided in the 2025 Parking Analysis prepared for the Modified Project (Appendix O to this Revised Draft EIR), the parking demand scenario analyzed in the study is considered a “worst-case” scenario for a weekday and weekend day since the occupancy of the hotels is assumed to be 100 percent and all three of the function/meeting rooms in Dana House Hotel are assumed to be utilized at the same time. This analysis considers parking demand for visitors, employees, simultaneous shared usage for visitors who may park off-site but visit the hotels, and visitors that will use alternative modes of transportation. The proposed redevelopment of PA 3 will provide a total of 197 parking spaces for Dana House Hotel with 161 on the project site and 36 employee surface parking spaces in PA 2; 15 employee surface parking spaces in PA 2, and 136 covered parking spaces within the Dana House Hotel garage structure will be provided for Surf Lodge (151 total); 45 surface parking spaces in either PA 2 or PA 5 and 133 covered parking spaces serving as designated boater parking for the boat slips will be provided within the garage structure beneath Dana House Hotel (178 total). The total parking provided for the Modified Project would be 526 parking spaces with 430 spaces in PA 3 and the remaining 96 spaces in PAs 2 or 5 as noted above.

The minimum parking needs based on Chapter 14 of the Dana Point Harbor District Regulations would require the project to provide a total of 733 parking spaces. However, Chapter 14 of the Dana Point Harbor District Regulations allows for consideration of shared parking. The PA 3 Parking Assessment prepared an analysis of parking demand taking shared parking principles into account. When shared parking demand patterns are taken into account and non-captive ratios are applied, the parking demand drops to 477 parking spaces on a peak activity weekday (results in a surplus of 49 spaces) and 495 parking spaces on a peak activity weekend (results in a surplus of 31 spaces). Although it is also important to note this parking analysis reflects a “worst-case” scenario (i.e., 100 percent hotel room occupancy as well as full use of function/meeting facilities), this level of activity at the hotels should be considered a very rare occurrence. Therefore, the Modified Project would not result in an inconsistency with applicable plans and policies for providing adequate parking. Impacts would be less than significant, and no mitigation is required.

Based on the analysis presented above, the Modified Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

**Threshold 4.12.2: Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?**

**Less Than Significant Impact.** According to *State CEQA Guidelines* Section 15064.3(a), project-related transportation impacts are generally best measured by evaluating the project's VMT. VMT refers to the amount and distance of automobile travel attributable to a project.

In order to determine whether a project has a significant transportation impact under CEQA, the traffic analysis must determine whether the project would conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3 subdivision (b). Specifically related to land use projects, Section 15064.3(b) of the California Code of Regulations states the following:

“Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.”

The City of Dana Point has not adopted by resolution additional applicable thresholds of significance related to VMT. However, *State CEQA Guidelines* Section 15064.7(c) states the following:

When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency is supported by substantial evidence.

Although the City has not adopted specific VMT thresholds, the County has adopted the *Guidelines for Evaluating Vehicle Miles Traveled under CEQA for the County of Orange* (County Guidelines) and the *2020 Updated Transportation Implementation Manual* (Implementation Manual). The County Guidelines establish analysis methodology for land development projects. The Implementation Manual describes the procedures for vehicle LOS and VMT analysis for facilities under the sole control of the County. Previous versions of this analysis applied methodology for analysis of hotel land uses similar to those applied by another public agency in Orange County. Because Dana Point Harbor is owned and operated by the County, application of the County Guidelines is more appropriate in lieu of guidelines adopted by the City. The County Guidelines follow the recommendation of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Governor's Office of Planning and Research 2018) in establishing numeric thresholds for residential, office, and retail projects. As a commercial project other than a residential, office, or retail development, the County Guidelines state that a proposed project should be evaluated based on the VMT per employee generated by the project. The values of VMT and number of employees are available for the Modified Project's analysis zones within the regional traffic model; thus, this calculation can be made directly.

The County Guidelines establish a threshold of no net increase in the VMT rate for other land uses consistent with the General Plan or a threshold of 15 percent below the existing regional average rate for land uses inconsistent with the General Plan. The County Guidelines provide substantial evidence for use of the County as the regional average.

**County Guidelines VMT Analysis.** Because both the County Guidelines and the Implementation Manual make clear that the significance threshold is measured against the “existing regional average,” the baseline model year is used in this analysis. Traffic models group geographic areas of a city or region (often grouped by land use type) into districts/zones. A Traffic Analysis Zone (TAZ) will have trips attracted to it and/or leaving it based on the land uses and their trip-making characteristics. The traffic model will match trips generated and trips attracted between TAZs and assign those trips along the roadway network. The traffic model’s baseline year output is checked against empirical data of actual traffic volumes to adjust the model’s variables and ultimately validate its prediction of the region’s trip making. Future traffic volumes are forecast by applying the validated baseline year assumptions to future changes to land uses and the roadway network. The validation of the baseline year against empirical traffic data is another reason why use of the baseline year to analyze a proposed project against the “existing regional average” threshold is the best tool.

A TAZ with employment land uses will attract trips that its employees are making as they travel from work to home. A traffic model would pair these attractions with residential trips generated by people making a trip from home to work. These trips between home and work are labeled “Home-Based-Work” in the traffic model output. LSA isolated the Home-Based-Work VMT generated by hotel employees in the Modified Project’s TAZ. The Orange County Transportation Analysis Model (OCTAM) model calculated trips and trip distances into and out of this TAZ, and the output shows 1,344 VMT are projected for the Modified Project’s employees. The OCTAM model output also shows that 94 employees are estimated by the model based on the size of the land use.

The number of employees was verified in two ways. First, the 2025 Parking Analysis states that the hotels are anticipated to have between 85 and 100 employees working the morning shift and 60 to 75 employees working the second shift. Based on this information, a maximum of 175 employees are possible. Taking the midpoint of these ranges results in an estimate of 160 employees. Second, LSA queried the *ITE Trip Generation Manual* to develop an employees-per-room ratio based on published rates for trips per room and trips per employee. This method estimates 94 employees for the 299 hotel rooms, which matches the OCTAM model output. Table 4.12.I above calculates VMT per employee under the Modified Project based on this lower employee estimate. Calculating VMT per employee based on a higher employee estimate would artificially decrease the VMT per employee calculation and would not be the most conservative approach.

As shown in Table 4.12.I above, the Modified Project is anticipated to generate 14.3 VMT per employee, which is more than 15 percent less than the regional average of 24.1 VMT per employee. As such, the Modified Project would not exceed an applicable VMT-related threshold.

While the analysis presented above was prepared consistent with County Guidelines and ultimately informs the significance determination presented in this Revised Draft EIR, due to the unique nature of hotel projects related to VMT, the following additional analysis is presented.

**Future VMT.** Although the County Guidelines and Implementation Manual make clear that the significance threshold being measured against is the existing regional average, future year VMT per employee was also calculated for the Modified Project TAZ. The OCTAM future year model is

validated for the year 2050. In this future year, the Modified Project is anticipated to generate 1,294 VMT, which would equate to 13.8 VMT per employee.

**VMT Per Service Population.** As discussed above, the County Guidelines specify that commercial projects such as the Modified Project should be evaluated based on the project’s VMT per employee. In order to provide further information in regard to other sources of VMT from the Modified Project, the Modified Project’s VMT per service population (i.e., employees plus hotel guests) was calculated based on OCTAM model output. OCTAM model output for the Modified Project TAZ estimates 228 hotel guests making vehicle trips each day in addition to the 94 employees. OCTAM does not have a fixed formula for hotel guests per hotel room but the model’s coefficients are adjusted during the validation phase to match model output with empirical traffic volume data. Estimating a higher number of hotel guests to account for guests not making vehicle trips from the hotel would increase the service population and lower the VMT per service population calculation.

Table 4.12.J summarizes the calculation of the Modified Project’s VMT per service population and compares to the County’s regional average. The Modified Project’s 1,344 Home-Based Work VMT (i.e., VMT generated traveling from a person’s home to their work) is the same as shown in Table 4.12.I. The 2,817 Other VMT are calculated by OCTAM based on the Productions and Attractions (PA) of the Modified Project. This methodology isolates hotel generated VMT and avoids mixing in boater trips present in the TAZ’s Origins and Destinations (OD). To present a comparison of equivalent data, Table 4.12.J presents the County’s PA VMT by category. The VMT per service population divides the total VMT (i.e., the total of resident-based, employment-based, and other VMT categories) by the total population (i.e., residents, employees, and all other population).

**Table 4.12.J: Additional VMT per Service Population Calculation**

	Baseline Model		Future Model (2050)	
	Project	Region	Project	Region
Resident Population	0	3,196,231	0	3,327,124
Employment	94	1,805,476	94	2,018,954
Other Population	228	783,227	228	760,658
Total Service Population	322	5,784,934	322	6,106,736
Home-Based VMT	0	49,692,612	0	53,565,267
Home-Based Work VMT	1,344	31,115,291	1,294	32,279,841
Other VMT	2,817	54,299,970	2,773	58,679,817
Total VMT	4,161	135,107,873	4,097	144,524,925
VMT per Service Population	12.9	23.4	12.6	23.7
15 Percent Below Regional Average	-	19.9	-	20.1

Sources: LSA (2025); Orange County Transportation Analysis Model (OCTAM).  
VMT = vehicle miles traveled

As Table 4.12.J shows, the Modified Project's VMT per service population in the baseline model is 12.9 and in the future year model is 12.6. Although no threshold exists as this additional analysis is not specified in the County Guidelines, it should be noted that the Modified Project VMT per service population is more than 15 percent less than the regional average. As such, calculating the VMT per service population of the Modified Project does not identify any potentially significant environmental impacts.

As described in Section 3.3.3, Parking and Access, of Chapter 3.0, Project Description, of this Revised Draft EIR, a complementary shuttle service to other destinations within the Harbor (i.e., Baby Beach, the Ocean Institute, and Doheny State Beach) using electric golf carts would be provided for hotel guests under the Modified Project. These electric golf carts may also be used for boater services. Pedestrian access, electric golf cart shuttle service, and proximity to transit would result in reduced vehicle trips by hotel patrons. The 2025 Parking Analysis prepared for the Modified Project (Appendix O) also recommended that a transportation coordinator be appointed for employees within PA 3. If this recommendation or other strategies to reduce automobile travel are adopted, further VMT reductions are anticipated.

Overall, based on the analysis presented above, the Modified Project would not conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3, subdivision (b). Impacts would be less than significant, similar to the conclusion reached in the 2021 Draft EIR, and no mitigation is required.

**Threshold 4.12.4: Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** As described above, the Modified Project would not change the local circulation or the configuration of local roadways. Emergency access to the project site would continue to be provided via Dana Point Harbor Drive during construction and operation of the Modified Project.

Construction of the Modified Project would occur for approximately 32 months. During construction of the Modified Project, the number of worker and truck trips per day is anticipated to be fewer than during operations of the Modified Project, which are expected to generate approximately 1,104 net new daily vehicle trips. Although construction trip generation would be significantly less than the net trip generation of the Modified Project, which was determined to not have a significant effect on City streets, construction traffic impacts could result in traffic delays and detours.

As described in Threshold 4.12.1 above, implementation of SC 4.12-1 would also ensure traffic controls are implemented during construction of the Modified Project to maintain emergency access, consistent with Land Use Policy 8.6.8-3 of the DPHRP, Dana Point Harbor Fire Policies. Internal circulation would be subject to review and approval by the County of Orange prior to issuance of the necessary ministerial permits. Furthermore, access to and from the project site during operations of the Modified Project must be designed to City standards and would be subject to review by the Orange County Fire Authority (OCFA) and the Orange County Sheriff Department (OCSD) for compliance with fire and emergency access standards and requirements.



In addition, as discussed in the 2025 TIA prepared for the Modified Project, operation of the Modified Project would not result in substantial turn queuing that would exceed the existing storage of any of the study intersections. With implementation of SC 4.12-1, the Modified Project's impact related to emergency access would be less than significant.

#### 4.12.7 Level of Significance Prior to Mitigation

Prior to mitigation, the Modified Project would result in less than significant impacts. No mitigation is required.

#### 4.12.8 Standard Conditions and Mitigation Measures

The Modified Project would comply with the following standard conditions. The City considers these conditions to be mandatory; therefore, they are not considered mitigation.

**Standard Condition 4.12-1 Construction Management Plan.** Prior to the issuance of demolition, grading or any construction permits, the Project Applicant shall submit a Construction Management Plan for review and approval by the City of Dana Point (City) Traffic Engineer and the County of Orange. The Construction Management Plan shall include, at a minimum, the following measures, which shall be implemented during all construction activities as overseen by the Construction Contractor:

- Traffic controls shall be implemented for any street closure, detour, or other disruption to traffic circulation and will maintain emergency access to the site.
- The routes that construction vehicles shall utilize for the delivery of construction materials (i.e., lumber, tiles, piping, windows, etc.) to access the site shall be identified; traffic controls and detours shall be identified; and the proposed construction phasing plan for the project shall be provided.
- The hours during which transport activities will occur shall be specified.
- Identify the haul route for the materials to be removed (i.e., concrete, soil, steel, etc.) during the demolition phase and/or soil import during the site preparation phase.
- Subject to the direction of the City's Traffic Engineer, haul operations associated with the materials export/soil import may be prohibited during the a.m. and p.m. peak commute periods (i.e., between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m.).

- The Project Applicant shall keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Project Applicant shall clean adjacent streets, as directed by the City's Traffic Engineer (or representative of the City Engineer), of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.
- Hauling or transport of oversize loads shall be allowed between the hours of 9:00 a.m. and 3:00 p.m. only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays.
- Use of local streets as haul routes shall be prohibited.
- Haul trucks entering or exiting public streets shall at all times yield to public traffic.

Implementation of the measures included in the Construction Management Plan, including maintenance of emergency access, shall be continued through construction inspection services.

#### 4.12.9 Level of Significance after Mitigation

With the implementation of SC 4.12-1, all impacts related to construction traffic would be less than significant. No potentially significant impacts would occur under the Modified Project related to traffic or transportation requiring mitigation.

#### 4.12.10 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. The cumulative impact area for traffic/transportation is the City of Dana Point and the City of San Juan Capistrano. A list of approved/pending projects provided by the City was reviewed to determine whether projects in the vicinity of the project site (if any) should be included in the cumulative condition. With concurrence from the City, the approved/pending projects listed in Chapter 4.0, Table 4.A, Summary of Related Projects, were identified as cumulative projects.

In order to develop traffic volumes in the Modified Project's Opening Year (2028), the list of 15 approved and pending projects included in Table 4.A that could reasonably be assumed to be operating by the Modified Project opening year was analyzed. For several of these projects, traffic studies were available that calculated weekday peak-hour trip generation. For projects without traffic studies, a cumulative project trip generation table provided by the City or trip rates from the *ITE Trip Generation Manual*, 11<sup>th</sup> Edition, were utilized to calculate weekday a.m., weekday p.m., and weekend peak-hour of generator traffic volumes for the cumulative projects. For cumulative projects with approved a.m. and p.m. peak-hour traffic volumes (including trip credits) but no

weekend traffic volumes, a ratio was calculated between ITE weekend and ITE p.m. peak-hour trip rates and applied that ratio to the cumulative project’s p.m. peak-hour traffic volume. This method accounts for the trip credits applied to the Modified Project.

The traffic study for the Dana Point Harbor Revitalization Project did not include weekend trip generation in the trip generation table, but weekend inbound and outbound trip generation could be calculated by adding the weekend peak-hour inbound and outbound trips illustrated on the weekend trip assignment graphic. A majority of the improvements proposed under the Modified Project are located within PA 3 of the Dana Point Harbor Revitalization Plan. To avoid double counting, project traffic volumes were subtracted from the PA 3 traffic volumes from the Dana Point Harbor Revitalization Plan. Table 4.12.K, below, displays traffic volumes for the cumulative projects.

**Table 4.12.K: Cumulative Project Trip Generation**

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour			Weekend Peak Hour		
				In	Out	Total	In	Out	Total	In	Out	Total
<b>Trip Rates<sup>1</sup></b>												
General Light Industrial (110)		TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65	0.05	0.05	0.10
Single-Family Detached Housing (210)		DU	9.43	0.18	0.52	0.70	0.59	0.35	0.94	0.50	0.42	0.92
Multifamily Housing (Mid-Rise) (221)		DU	4.54	0.09	0.28	0.37	0.24	0.15	0.39	0.20	0.19	0.39
Hotel (310)		Room	7.99	0.26	0.20	0.46	0.30	0.29	0.59	0.40	0.32	0.72
Resort Hotel (330) <sup>2</sup>		Room	5.55	0.23	0.09	0.32	0.18	0.23	0.41	0.28	0.22	0.50
Church (560)		TSF	7.60	0.20	0.12	0.32	0.22	0.27	0.49	1.57	1.13	2.70
General Office Building (710)		TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44	0.29	0.24	0.53
Building Materials and Lumber Store (812)		TSF	17.05	0.99	0.60	1.59	1.04	1.21	2.25	4.89	4.69	9.58
Strip Retail Plaza (<40 TSF) (822)		TSF	54.45	1.42	0.94	2.36	3.30	3.29	6.59	3.35	3.22	6.57
<b>Trip Generation</b>												
1. Headlands Specific Plan <sup>3</sup>			4,379	100	114	214	219	178	397	176	123	299
2. Dana Point Harbor Revitalization (Commercial Core) <sup>4,8</sup>			5,477	202	182	384	252	192	444	489	369	858
Dana Point Harbor Revitalization (Marina Remodel) <sup>4</sup>			420	23	3	26	17	25	42	17	35	52
3. South Cove <sup>3, 11</sup>	168 2,471	DU TSF	1,083	15	63	78	64	34	98	70	59	129
4. South Shores Church Master Plan <sup>5</sup>	46.817	TSF	255	12	0	12	0	18	18	60	42	102
5. Vista del Mar <sup>6</sup>			238	4	13	17	2	(6)	(4)	7	7	14
6. Del Prado Place <sup>1</sup>	18 5,000	DU TSF	442	10	15	25	28	22	50	26	24	50
7. Paseo Del Prado <sup>1</sup>	29 11,750	DU TSF	913	22	26	48	55	49	104	54	50	104
8. Lantern District Mixed Use <sup>1</sup>	50 22	DU Room	403	11	18	29	19	14	33	19	17	36
9. Capistrano Hillside Project (210) <sup>1</sup>	11	DU	104	2	6	8	6	4	10	5	5	10

**Table 4.12.K: Cumulative Project Trip Generation**

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour			Weekend Peak Hour		
				In	Out	Total	In	Out	Total	In	Out	Total
10. Lantern Point Hotel <sup>6</sup>	51	Room	443	15	10	25	16	16	32	21	17	38
11. Resort Hotel at Cannon's <sup>6</sup>	107	Room	130	30	20	50	(7)	11	4	(9)	(2)	(11)
12. Doheny Ocean Desalination Plant <sup>7</sup>	15	EMP	36	10	2	12	2	10	12	1	2	3
13. Victoria Boulevard/CUSD Bus Yard (221) <sup>6</sup>	365	DU	2,518	31	124	155	129	75	204	138	118	256
14. Doheny Village Zoning District <sup>8,9</sup>			7,256	152	160	312	290	329	619	311	352	663
15. Ganahl Lumber Development Project <sup>10</sup>	5,000	TSF	1,027	49	44	93	40	36	76	66	61	127

Source: LSA (2025).

<sup>1</sup> Trip rates referenced from the *Trip Generation Manual*, 11<sup>th</sup> Edition (ITE 2021).

<sup>2</sup> Daily and Saturday rates calculated from standard hotel ITE rates.

<sup>3</sup> 34202 Del Obispo Street Traffic Impact Analysis (LSA 2014a).

<sup>4</sup> Dana Point Harbor Revitalization Traffic and Parking Analysis (RBF 2005).

<sup>5</sup> South Shores Church Master Plan Traffic Impact Analysis and Parking Analysis (LSA 2014b).

<sup>6</sup> Victoria Boulevard Apartments Traffic Impact Analysis (City of Dana Point 2022).

<sup>7</sup> Doheny Ocean Desalination Project Draft Environmental Impact Report (LSA 2018).

<sup>8</sup> Draft Doheny Village Zoning District Overlay Zone Traffic Study (City of Dana Point 2020).

<sup>9</sup> No specific development projects are anticipated by the proposed project opening year.

<sup>10</sup> Ganahl Lumber Development Project Traffic Impact Analysis (LSA 2020a), hardware store and lumberyard completed, fast food not constructed.

<sup>11</sup> Construction completed but not fully occupied at time of analysis.

ADT = average daily trips

EMP = employee

CUSD = Capistrano Unified School District

ITE = Institute of Transportation Engineers

DU = dwelling unit

TSF = thousand square feet

**4.12.10.1 Cumulative (Opening Year 2028) Plus Project Condition**

As discussed in Section 4.12.6, Opening Year (2028) traffic volumes were calculated by applying the ambient growth rate of 2 percent (0.5 percent per year) and adding the cumulative project traffic volumes. Figures 7a and 7b of the 2025 TIA (included as Appendix N to this Revised Draft EIR) illustrate the resulting opening year baseline traffic volumes. Intersection LOS was calculated for these future volumes. Modified Project traffic volumes were added to the future volumes and intersection LOS and again calculated. In addition to these cumulative land use development projects, this analysis considers the effect of a planned roadway improvement project. As part of the approved Ganahl Lumber Development Project, a third eastbound through lane on Stonehill Drive is proposed between Del Obispo Street and Camino Capistrano.

While the potential trip generation for the Doheny Village Zoning District (DVZD) is shown on Table 4.12.K above, the City does not believe that any individual projects within the DVZD are anticipated by the Modified Project's opening year of 2028, and therefore no additional trips were added to the study intersections for the DVZD. For the Ganahl Lumber Development Project, the lumber yard and hardware store are completed but a planned fast-food pad has not yet been constructed, and trip generation for this project component remains in the cumulative project

analysis. Cumulative traffic volumes for the remaining cumulative projects were calculated using Traffix and are included as Figures 6a and 6b of the 2025 TIA (Appendix N to this Revised Draft EIR).

The City anticipates that an intersection improvement project at Golden Lantern/Dana Point Harbor Drive will be completed by the Modified Project opening year of 2028. The intersection improvement project consists of restriping the northbound and southbound approaches to provide one left-turn lane, one through lane, and one through/right-turn lane. The intersection improvements also include the removal of the northbound and southbound overlap phases. This intersection improvement project was included as a cumulative project. In addition, this analysis considers the effects of a planned roadway improvement project as part of the Ganahl Lumber Development Project. The project would construct a third eastbound through lane on Stonehill Drive between Del Obispo Street and Camino Capistrano.

Table 4.12.H, presented earlier in this section, presents the Opening Year (2028) Plus Project Intersection Level of Service Summary, which accounts for the cumulative project analysis. As Table 4.12.H shows, with the addition of cumulative traffic volumes, all study intersections are anticipated to continue to operate within their LOS target with the addition of cumulative project traffic. Therefore, cumulative impacts would be less than significant, and no mitigation is required.

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