San Clemente Housing Element Update

Transportation Impact Study

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1.0 Introduction

1.1 Purpose of the Report

This Transportation Impact Study (TIS) serves to identify and document potential transportation impacts related to the City of San Clemente Housing Element Update (the "Proposed Project") and recommend mitigation measures, as appropriate.

The City of San Clemente is located in Orange County about 26 miles south of Irvine, California. San Clemente is bordered on the east and southeast by the County of San Diego, Camp Pendleton, and unincorporated portions of Orange County, on the west by the Pacific Ocean and Dana Point, on the north by the City of San Juan Capistrano and unincorporated portions of Orange County. The City is about 18 square miles in size and has a population of about 67,000 people with approximately 27,500 housing units. The City has two Metrolink stations: San Clemente and San Clemente Pier. **Figure 1.1** displays the City of San Clemente location in the Orange County Region.

In December 2018, the California Resources Agency certified and adopted revised California Environmental Quality Act (CEQA) Guidelines, including the new Section 15064.3. Under Section 15064.3, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts."

1.2 Study Scenarios

Three (3) study scenarios were evaluated, including base year (2016) and two (2) future year alternatives, as follows:

- **Base Year (2016)** – establishes the baseline VMT within the project study area (City of San Clemente and its region, Orange County). The Orange County Transportation Authority Model (OCTAM) Base Year (2016) was utilized as a starting-point and validated for the City of San Clemente.

- **No Project (Adopted General Plan)** – represents buildout of the City of San Clemente's currently Adopted General Plan Land Use (both residential and commercial land uses) and Mobility Elements.

- **Proposed Project** – represents buildout of the City (both residential and commercial land uses) and the Proposed Project's rezone sites and proposed housing sites which were developed in collaboration with City staff and the project consultant team. The Proposed Project's sites override the sites identified in the City's Adopted General Plan. A summary of the proposed housing sites is provided in Chapter 2 of this report, while the locations of the housing sites are displayed in **Figure 1.2.**

All study scenarios were modeled using the validated OCTAM with San Clemente-specific information, including roadway network and socioeconomic data from the California State University, Fullerton – Center for Demographic Research, provided by City staff. Additionally, the OCTAM model utilized is consistent with the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and includes transportation projects such as highway improvements, transportation demand management projects, railroad grade separations, bicycle lanes, new transit hubs, new transit routes, and replacement bridges.

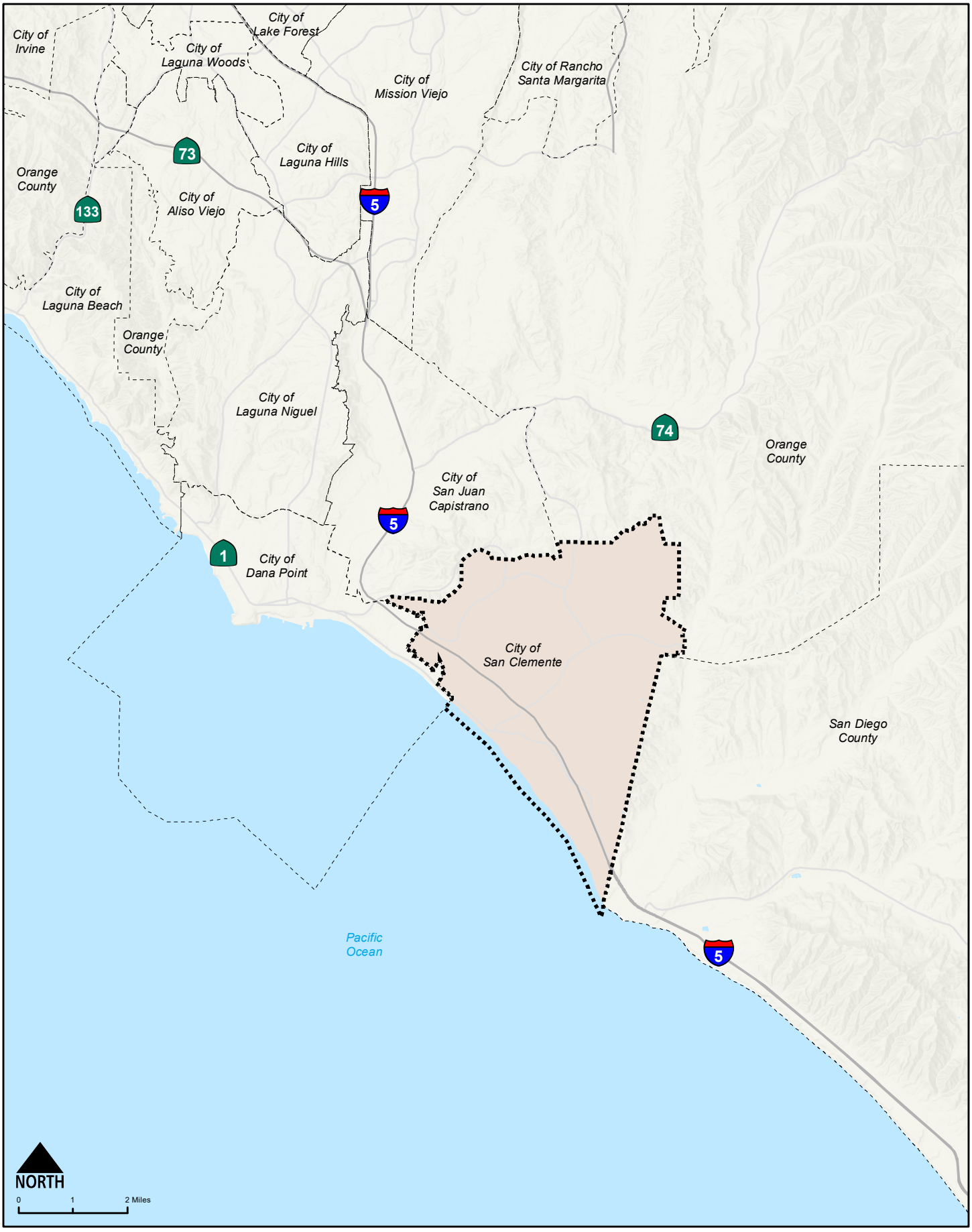

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Figure 1.1
Project Regional Location

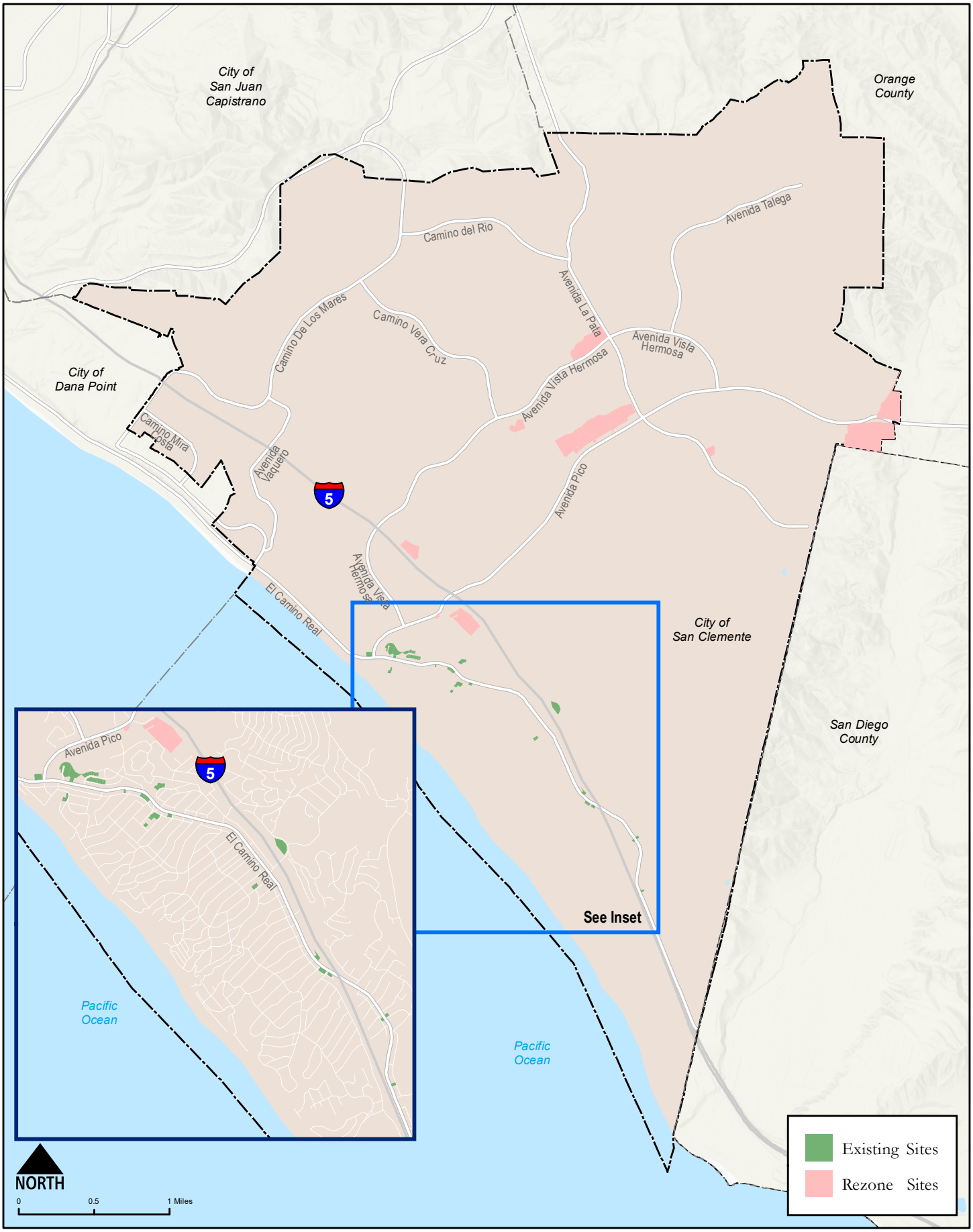

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Figure 1.2
Proposed Housing Sites

1.3 Report Organization

The remainder of this report is organized into the following chapters:

2.0 Project Description – This chapter summarizes land use assumptions for Base Year (2016) and future year alternatives including the Adopted General Plan (No Project) and the Proposed Project.

3.0 Analysis Methodology – This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. Note that as of July 1, 2020, VMT is the metric (rather than Level of Service) for CEQA transportation-related impact evaluation.

4.0 Project Impacts – This chapter discusses the VMT analysis and identifies potential transportation impacts of the Proposed Project. Mitigation measures to reduce the identified VMT impacts, as necessary, are also discussed.

5.0 Alternative Analysis – This chapter discusses the VMT analysis and potential transportation impacts of the No Project alternative.

6.0 Summary – This chapter summarizes the findings of the VMT analysis.

2.0 Project Description

State law requires each jurisdiction to demonstrate in their Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. The Housing Element is a required element of the City's General Plan that sets citywide goals, objectives and policies for housing and identifies housing conditions and needs within the community. The Housing Element must be updated every eight years. The Proposed Project evaluates adoption of the City's 2021-2029 Housing Element, including rezones that will be necessary to implement the Housing Element and achieve the City's Regional Housing Needs Assessment (RHNA) allocation. Although various potential rezone sites are evaluated in the Environmental Impact Report (EIR), the City does not intend to adopt the rezones concurrent with the Housing Element Update (HEU) adoption. Future rezones will be undertaken as a separate action but will rely on the environmental analysis completed with the environmental document. The HEU will ensure the City's General Plan is internally consistent and in compliance with State housing law.

Table 2.1 displays the existing sites for residential uses to be included as part of the project. All housing sites are considered draft as they are subject to further review and approval by the City Council and the California Department of Housing and Community Development.

Table 2.2 identifies candidate rezone sites which were selected based on the following factors:

- The existence of high vacancy/turnover rates, declining/marginal operations, outdated business models;
- Age and condition of structure;
- Underutilized existing land use, e.g., number of units and/or Floor Area Ratio;
- Expressed interest of property owners or developers for redevelopment; and
- Areas exhibiting active development activity.

Table 2.1 Candidate Existing Sites

ID	Assessor Parcel Number	Address	Acres	Current Zoning	Potential Units*
1	692-131-06	Near 1201 S. El Camino Real	0.42	NC2	14
2	692-171-18	1430 S. El Camino Real	0.22	NC2	7
3	692-171-19	1430 S. El Camino Real	0.22	NC2	7
4	690-422-03	Near 2201 S. El Camino Real	0.1	NC3	3
5	690-422-04	Near 2201 S. El Camino Real	0.1	NC3	3
6	692-362-08	1400 N. El Camino Real	0.11	NC2	4
7	692-395-27	902 N. El Camino Real	0.27	NC2	9
8	692-381-25	1300 block N. El Camino Real	0.09	RM	2
9	692-381-26	1300 block N. El Camino Real	0.09	RM	2
10	692-381-27	1300 block N. El Camino Real	0.09	RM	2
11	692-381-28	1300 block N. El Camino Real	0.1	RM	2
12	692-381-29	1300 block N. El Camino Real	0.1	RM	2
13	692-381-30	1300 block N. El Camino Real	0.1	RM	2
14	692-381-31	1200 block N. El Camino Real	0.09	NC2	3
15	692-394-06	100 W. El Portal	0.09	NC2	3
16	692-394-07	100 W. El Portal	0.09	NC2	3
17	692-394-20/21 (Previously 692-394-17)	101 W. El Portal	0.65	NC2	21
18	690-445-02	1502 S. El Camino Real	0.15	NC2	3
19	690-445-03	1502 S. El Camino Real			
20	060-041-02	2400 S. El Camino Real	0.15	NC3	3
21	060-041-03	2400 S. El Camino Real			
22	692-394-02	--	0.62	NC2	20
23	692-121-15	1629 Calle Las Bolas	0.15	RH	5
24	692-121-16	1603 Calle Colina	0.12	RH	4
25	692-121-17	1601 Calle Colina	0.14	RH	5
26	057-151-26	111 La Ronda	0.17	RM	4
27	057-151-04	115 La Ronda	0.15	RM	3
28	057-151-05	119 La Ronda	0.16	RM	3
29	690-013-01	101 North La Esperanza	2.18	RM	30
30	692-173-04	1502 S. El Camino Real	0.25	MU3	12
31	057-182-21	105 Calle De Los Molinos	0.14	MU2(CZ)	5
32	057-182-52	109 Calle De Los Molinos	0.26	MU2(CZ)	9
33	057-170-22	110 Calle De Los Molinos	0.11	MU2(CZ)	4
34	057-182-18	111 Calle De Los Molinos	0.11	MU2(CZ)	3

Table 2.1 Candidate Existing Sites

ID	Assessor Parcel Number	Address	Acres	Current Zoning	Potential Units*
35	057-170-21	112 Calle De Los Molinos	0.10	MU2(CZ)	3
36	057-170-20	114 Calle De Los Molinos	0.11	MU2(CZ)	4
37	057-182-19	115 Calle De Los Molinos	0.15	MU2(CZ)	5
38	057-170-64	116 Calle De Los Molinos	0.22	MU2(CZ)	7
39	057-182-10	117 Calle De Los Molinos	0.08	MU2(CZ)	3
40	057-182-11	119 Calle De Los Molinos	0.09	MU2(CZ)	3
41	057-182-12	119 Calle De Los Molinos	0.10	MU2(CZ)	3
42	057-170-17	120 Calle De Los Molinos	0.11	MU2(CZ)	4
43	057-170-16	122 Calle De Los Molinos	0.11	MU2(CZ)	4
44	057-170-15	124 Calle De Los Molinos	0.11	MU2(CZ)	4
45	057-170-14	126 Calle De Los Molinos	0.11	MU2(CZ)	4
46	057-170-13	124 Calle De Los Molinos	0.11	MU2(CZ)	4
47	057-170-12	122 Calle De Los Molinos	0.11	MU2(CZ)	4
48	057-170-11	120 Calle De Los Molinos	0.12	MU2(CZ)	4
49	057-191-57	1607 Calle Lago	0.34	LI(MU)	12
50	057-191-59	108 Calle Lago	1.46	LI(MU)	53
51	691-433-03	1623 N El Camino Real	1.35	LI(MU)	49
52	058-091-16	100 Avenida Rosa	0.09	RM	2
53	058-091-15	100 Avenida Rosa	0.09	RM	2
54	058-091-14	100 Avenida Rosa	0.10	RM	2
55	058-091-43	130 Avenida Rosa	0.09	RM	2
56	057-191-60	1801 N El Camino Real	0.74	MU1	27
57	057-191-31	1629 N El Camino Real	0.23	MU1	8
				TOTAL	**415**

Source: City of San Clemente (2021)

Table 2.2 Candidate Sites for Rezoning

ID	Assessor Parcel Number	Address	Acres	Current Zoning	Proposed Zone (dwelling units per acre)	Potential Units*	Affordability
A	679-021-05	Calle Frontera	5.31	MISP (I)	RMH (30.0)	127	Affordable
B	688-161-04	190 Avenida La Pata	2.17	RSCSP (Business Park)	RMH (30.0)	52	Affordable
C	678-161-02	990 Avenida Vista Hermosa	1.60	FRSP (NC)	RMH (30.0)	38	Affordable
D	688-021-36	907 Avenida Pico	10.75	RSCSP (MU)	Housing Overlay RM or RSCSP RH (24.0)	206	Moderate
E	688-021-37		0.83	RSCSP (MU)	Housing Overlay RM (24.0)	16	Moderate
F	688-021-33	911 Avenida Pico	0.69	RSCSP (MU)	Housing Overlay RM (24.0)	13	Moderate
G	688-021-34	915 Avenida Pico	0.68	RSCSP (MU)	Housing Overlay RM (24.0)	13	Moderate
H	688-021-30	937 Avenida Pico	2.36	RSCSP (MU)	Housing Overlay RM (24.0)	45	Moderate
I	688-021-14	957 Avenida Pico	0.79	RSCSP (MU)	Housing Overlay RM (24.0)	15	Moderate
J	688-021-31	943 Avenida Pico	2.18	RSCSP (MU)	Housing Overlay RM (24.0)	42	Moderate
K	688-021-15	951 Avenida Pico	10.48	RSCSP (MU)	Housing Overlay RM (24.0)	201	Moderate
L	688-021-16	959 Avenida Pico	0.53	RSCSP (MU)	Housing Overlay RM (24.0)	10	Moderate
M	688-021-17	963 Avenida Pico	0.56	RSCSP (MU)	Housing Overlay RM (24.0)	11	Moderate
N	688-131-22	979 Avenida Pico	2.43	RSCSP (MU)	Housing Overlay RM (24.0)	47	Moderate
O	688-131-21	989 Avenida Pico	6.42	RSCSP (MU)	Housing Overlay RM (24.0)	123	Moderate
P	688-021-18	965 Avenida Pico	0.74	RSCSP (MU)	Housing Overlay RM (24.0)	14	Moderate
Q	688-131-20	993 Avenida Pico	2.00	RSCSP (MU)	Housing Overlay RM (24.0)	38	Moderate
R	692-351-09	101 Pico Plaza	7.46	WPCSP (CC2)	Housing Overlay RMH (30.0)	178	Affordable
S	692-351-05	85 Pico Plaza	3.03	WPCSP (CC2)	Housing Overlay RMH (30.0)	73	Moderate
T	692-351-10	91 Pico Plaza	0.37	WPCSP (CC2)	Housing Overlay RMH (30.0)	9	Moderate
U	057-020-68	416 E Ave Pico	0.48	WPCSP (CC2)	Housing Overlay RMH (30.0)	12	Moderate
V	701-043-09	Pico	14.47	TSP (C & OS)	TSP RH (40.0)	462	Affordable
W	701-041-59	Pico	7.50	TSP (OS)	TSP RH (40.0)	240	Affordable
X	679-152-03	Camino Vera Cruz	3.33	MISP (OS)	RMH (30.0)	79	Affordable
					TOTAL	**2,066**	-

Source: City of San Clemente (2021)

Notes:
*Total does not add due to rounding.
"Affordable" includes the categories of Extremely/Very Low and Low.
"Moderate" includes categories of Moderate and Above Moderate.

The HEU includes City policies, strategies, and actions to facilitate the construction of new housing and preservation of existing housing to meet the needs of the population during the planning period for all economic segments. The following programs will continue under the 2021-2029 Housing Element Cycle:

- The City's Inclusionary Housing Program requires developers building six or more units to provide 4 percent of the total number of units for very low-income households, on-site, off-site, or pay an in-lieu fee, donation of land, or a combination recommended by the Community Development Director.
- The Neighborhood Revitalization Program provides loans for qualified rental properties and owner-occupied properties, provides special neighborhood clean-ups, public education of laws and services, and code enforcement.
- The Social Services Grant Program supports grants related to housing, homelessness, health, and youth.
- The Affordable Housing Program provides funds for non-profit agencies to acquire and rehabilitate older apartment buildings or construct new apartments for long term affordable housing for very low-income households (persons earning less than 50 percent of median income).

In addition, the HEU will introduce new programs, including the following as mandated by State law:

- Rezoning for RHNA: The HEU will establish a schedule for rezoning to provide adequate sites for the RHNA.
- Housing by Right: The HEU will require that the Zoning Code be amended to permit housing by right without discretionary review on reuse and rezone sites when a project sets aside 20 percent of the units as affordable to lower income households.
- Accessory Dwelling Units (ADUs): The HEU will identify the actions that the City will undertake to facilitate the development of ADUs.
- Affirmatively Furthering Fair Housing Choice: The HEU will outline the City's efforts in promoting fair housing.

3.0 Analysis Methodology

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with Vehicle Miles Traveled (VMT) as the preferred CEQA transportation metric.

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for future alternatives.

3.1 Determination of VMT Significant Impacts

VMT is positively correlated with growth and as the region is expected to grow, VMT is also expected to increase. However, where the growth occurs plays a significant role to determine how much the VMT will increase. Growth in areas with access to high-quality transit, a complete active transportation network, and/or complementary land use mixes are projected to be more VMT efficient.

In the Technical Advisory on Evaluating Transportation Impacts on CEQA (December 2018), Governor's Office of Planning and Research (OPR) recommends the use of VMT metrics when analyzing land use projects and plans. For residential uses, the recommended efficiency metric is Resident VMT per Capita.

The following definitions describe how VMT is referred to, calculated, and accounted for in this programmatic CEQA impact analysis:

- **Resident VMT/Capita** includes all daily vehicle-based person trips originated from or ended at the home location of the individual (driver or passenger). Only home-based VMT are included in this calculation. The VMT for each individual is then summed for all individuals in the analysis area and divided by the population of the same analysis area to arrive at Resident VMT/Capita.

The OPR Technical Advisory recommends that VMT/capita results should be compared to the 85th percentile of region's average for that land use type – in this case, the Orange County's average resident VMT/Capita was used. The regional average VMT is determined using the OCTAM Base Year (2016), and the regional average resident VMT per Capita is 18.6 miles. Excerpts from the regional transportation model are provided in **Appendix A**.

Consistent with the OPR Technical Advisory, the significance threshold is shown in **Table 3.1**.

Table 3.1 Transportation VMT Thresholds of Significance by Land Use Type

Land Use Type	Threshold for Determination of a Significant Transportation VMT Impact
Residential	15% Below Region's Average Resident VMT/Capita

For the purpose of this transportation impact study, a Plan-to-Ground analysis was conducted by comparing the Proposed Project and the No Project Alternative to Base Year (2016), which is representative of the baseline conditions.

4.0 Impact Analysis – Proposed Project

This chapter focuses on whether the Proposed Project would have a significant impact and if the proposed new residential land uses would in aggregate exceed the VMT/Capita threshold identified in Table 3.1.

4.1 VMT Impact Analysis

To establish a baseline understanding, **Table 4.1** displays both Orange County and San Clemente's resident VMT efficiency metrics for the Base Year (2016) conditions. As shown, San Clemente has a less efficient VMT per capita when compared to the region, at approximately 161 percent of the region's resident VMT/capita.

Table 4.1 San Clemente & Region Base Year VMT Metrics for Transportation Impact Analysis

	Base Year (2016)		% of Regional Base Year
VMT Metric	Orange County	San Clemente	San Clemente
Resident VMT/Capita	18.6	30.0	161%

Source: OCTAM, Iteris, CR Associates (2021)

Table 4.2 presents the San Clemente average resident VMT/capita for the Proposed Project.

Table 4.2 San Clemente w/ Proposed Project & Region VMT Efficiency Metrics for Transportation Impact Analysis of Residential Uses

VMT Metric	Orange County	San Clemente	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	18.7	29.5	158% (> 85%)	Yes

Source: OCTAM, Iteris, CR Associates (2021)

As shown in Table 4.2, with the implementation of the Proposed Project land uses, including buildout of the City's General Plan land use and buildout of the transportation network, the VMT efficiency of San Clemente increases as the VMT/Capita goes from 30.0 under base year to 29.5.

Residential Land Uses Impact?

As shown in the table above, San Clemente is projected to have an average Resident VMT per Capita at 29.5, which is 158 percent of the base year regional average. VMT associated with residential would exceed the 85 percent threshold at buildout of the Proposed Project. Therefore, impacts related to VMT for residential land uses would be deemed as significant.

4.2 Mitigation Measures

As described in the Land Use Element of the Centennial General Plan, the City's goal for residential land uses is to achieve a mix of residential neighborhoods and housing types that meets the diverse economic and physical needs of residents, that is compatible with existing neighborhoods and the surrounding environmental setting, and that reflects community expectations for high quality. Additionally, new residential developments shall be designed to promote safe and convenient access to nearby commercial centers, community facilities, schools, parks, open space, transit facilities, bikeways, trails and other amenities, as applicable. By bringing in varied and complementary uses and a mobility network that supports and encourages walking, biking and taking transit, the Proposed Project could contribute to a more VMT efficient and sustainable future for the community.

Residential Land Uses

As shown in Table 4.2, impacts associated with the Proposed Project are considered significant, therefore, feasible mitigation measures must be considered. Overall, the proposed HEU is a planning document intended to guide future development throughout San Clemente. It provides detailed policies and implementation guidance that would be applicable for future developments. Due to the programmatic nature of the proposed HEU, it does not propose any specific development projects, and thus, cannot adequately anticipate specific project-level mitigation requirements at this time. To reduce residential VMT impacts, future developments under this proposed HEU would need to be mitigated on a project-by-project basis. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT per capita to the extent feasible by providing on-site VMT reducing infrastructure such as those found in the California Air Pollution Control Officers Association (CAPCOA)'s Quantifying Greenhouse Gas Mitigation Measures or other sources that have been vetted through peer-review research; or pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT.

Mitigation Measure MM-TR-1: Implementation of Mobility and Complete Streets Element Policies 1.01 through 1.16, 1.19 through 1.25, 2.01 through 2.54, 3.01 through 3.07, and 4.07, would reduce VMT throughout the City. Specifically, the City should ensure that future projects are compliant with Mobility Element Policy 1.21, which utilizes Transportation Demand Management Measures (TDM) to reduce single-occupant vehicles, and encourage alternative modes of transportation such as biking, walking or taking transit. Since TDM are typically applied at the project-level, a list of potential TDM is provided below:

- Increase mixed-use development
- Increase transit accessibility
- Provide pedestrian network improvement along project frontage
- Provide bicycle network improvement along project frontage
- Provide bicycle parking and bike lockers
- Implement subsidized or discounted transit passes
- Provide rider-sharing programs
- Implement commute trip reduction marketing
- Implement school pool program
- Implement bike-sharing or micro mobility program
- Provide local shuttle to connect visitors to different attractions throughout the City

Additional measures can be found in the CAPCOA Quantifying Greenhouse Gas Mitigation Measures report (http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf).

Implementation of the TDM above would potentially reduce each project's VMT. However, since TDM level of effectiveness varies from project to project, this Programmatic EIR cannot ensure that the TDMs would reduce the regional VMT to baseline conditions. Therefore, this mitigation while potentially feasible, is not ensured to fully mitigate significant impacts. Therefore, the VMT impact is considered significant and unavoidable.

4.3 Level of Significance After Mitigation

Should MM-TR-1 be adopted by City Council, and implemented, VMT would be reduced by individual projects that may be permitted and constructed under the proposed HEU. The effectiveness of the VMT reducing measures would need to be context-sensitive and would vary depending on the individual project site such as the location, access to transit, etc. For this reason, and because it is uncertain if, or when such measures would become effective, MM-TR-1 would not fully mitigate the VMT impact for residential land uses. Thus, transportation impacts due to the Proposed Project's would remain significant and unavoidable.

5.0 Alternatives Analysis

This chapter discusses potential VMT impacts under the No Project alternative. The No Project alternative is identical to the currently adopted General Plan. The VMT reports for residential land uses are included in **Appendix B**.

5.1 No Project Alternative (Adopted General Plan)

The purpose of evaluating the No Project alternative is to allow decision makers to compare the outcomes by approving the Proposed Project vs. maintain the currently adopted Plan. Future developments under the No Project alternative would result in 2,481 fewer dwelling units in the City.

Table 5.1 presents the San Clemente average resident VMT under the No Project alternative.

Table 5.1 San Clemente No Project Alternative
VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses

VMT Metric	Orange County	San Clemente	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	18.7	28.9	155% (> 85%)	Yes

Source: OCTAM, Iteris, CR Associates (2021)

As shown in Table 5.1, the No Project VMT/Capita also exceeds 85% of the regional average. The No Project alternative would also result in a significant VMT impact.

Mitigation measures discussed in Section 4.2 should be taken into consideration to reduce VMT/Capita to the extent feasible. However, similar to the Proposed Project, the VMT impact would remain significant and unavoidable.

6.0 Summary

As shown in this report, both the Proposed Project and No Project alternative would have a resident VMT/capita exceeding 85% of the regional average. Therefore, mitigation measures to reduce VMT/capita shall be taken into consideration (as described in Section 4.2) with either alternative. Implementation of TDM measures would potentially reduce VMT at a project-level. However, since TDM level of effectiveness varies from project to project, the Programmatic Environmental Impact Reports cannot ensure that the TDM programs would reduce the project VMT/capita to below impact threshold (85% of the regional VMT/capita). Therefore, the mitigation measure recommended in this TIS while potentially feasible, is not implementable at this time. Therefore, VMT impacts identified for both alternatives are considered significant and unavoidable.

Appendix A
Base Year and Proposed Project VMT Results

Home-based VMT/Capita

Scenario	City	County	City/County
Existing	30.0	18.6	161%
2045 With Project	29.5	18.7	158%

Total VMT

Scenario	City	City Population	County	County Population
Existing	2,171,399	66,389	71,162,346	3,174,528
2045 With Project	2,427,974	75,578	79,839,452	3,545,703

Appendix B
Project Alternatives VMT Results

Home-based VMT/Capita

Scenario	City	County	City/County
2045 No Project	28.9	18.7	155%

Total VMT

Scenario	City	City Population	County	County Population
2045 No Project	2,207,178	69,624	79,501,139	3,539,224