



## 11.7 VMT Analysis

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# TECHNICAL MEMORANDUM

To: Ms. Kristen Bogue  
Michael Baker International

Date: September 30, 2022

From: Zawwar Saiyed, P.E., Associate Principal  
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Linscott, Law and Greenspan, Engineers

LLG Ref: 2.21.4403.1

Subject: **Victoria Apt Specific Plan, Dana Point**  
**Revised Vehicle Miles Traveled (VMT) Analysis**

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As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Analysis Technical Memorandum for the proposed Victoria Apt Specific Plan project (herein after referred to as “Project”) in the City of Dana Point, California. This Technical Memorandum updates our previous submittal dated August 30, 2021 to include an updated Project description, address City staff comments, and presents the VMT screening criteria, analysis methodology, significance thresholds and VMT analyses. It should be noted that the approach and methodology outlined in this Technical Memorandum is generally consistent with the *Technical Advisory for Evaluating Transportation Impacts In CEQA*, published by the Governor’s Office of Planning and Research (OPR), December 2018 (OPR Technical Advisory), which provides additional detail on the language and analysis procedures described in this Technical Memorandum.

The proposed Project site is located within an area commonly referred to as Doheny Village. Doheny Village consists of approximately 80-acres and is located in the southeastern portion of the City. The approximately 5.5-acre Project site is specifically located at 26126 Victoria Boulevard on the southeast corner of Victoria Boulevard and Sepulveda Boulevard in the southeastern portion of Doheny Village. The Project is bound by Victoria Boulevard to the north, the Interstate 5 (I-5) off-ramp to Pacific Coast Highway on the east, Pacific Coast Highway on the south, and Sepulveda Avenue on the west. The site consists of one parcel (Assessor’s Parcel Number [APN] 668-361-01) owned by the Capistrano Unified School District (CUSD). Regional access to the site is provided via I-5 and Pacific Coast Highway. Local access is provided via Victoria Boulevard and Sepulveda Avenue.

The following sections of this Technical Memorandum provide a brief history of Senate Bill 743 (SB 743), summarize the Project description, present OPRs VMT screening criteria, analysis methodology and thresholds, Project VMT and Cumulative VMT.

## **PROJECT DESCRIPTION**

The proposed Project site is located within an area commonly referred to as Doheny Village. Doheny Village consists of approximately 80-acres and is located in the

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southeastern portion of the City. The approximately 5.5-acre Project site is specifically located at 26126 Victoria Boulevard on the southeast corner of Victoria Boulevard and Sepulveda Boulevard in the southeastern portion of Doheny Village. The Project is bound by Victoria Boulevard to the north, the Interstate 5 (I-5) off-ramp to Pacific Coast Highway on the east, Pacific Coast Highway on the south, and Sepulveda Avenue on the west. The site consists of one parcel (Assessor's Parcel Number [APN] 668-361-01) owned by the Capistrano Unified School District (CUSD). Regional access to the site is provided via I-5 and Pacific Coast Highway. Local access is provided via Victoria Boulevard and Sepulveda Avenue. **Figure 1** presents a vicinity map for the Project site. **Figure 2** presents an existing aerial of the Project site.

#### Existing Land Uses and Entitlements

The Project site is currently developed with seven structures and is used by the CUSD Ground Department for operations, maintenance, storage, bus/vehicle wash area, and refueling of school buses and other district vehicles. Only two of the seven structures located at the northwestern and northern portions of the site are currently in operations and utilized by the Grounds Department. The remainder of the site, including the former Tire Storage Building, Mechanic Shop, Transportation Office (previously used as the Serra School house), and refueling area are no longer in operation and are used mainly for storage purposes. Site access is afforded via two steel access gates along Sepulveda Avenue and three steel access gates along Victoria Boulevard. One pedestrian gate is also present on Sepulveda Avenue. Small areas of ornamental landscaping are present along the perimeter sidewalks to the west and east.

#### Proposed Project Development

The proposed Project involves the demolition of the existing CUSD bus yard and development of a three- to five-story, 349-unit apartment complex with an attached six-story (seven level) parking structure and associated amenities in accordance with the proposed Victoria Boulevard Specific Plan (Specific Plan). **Figure 3** presents the proposed site plan. As proposed, the Project would construct approximately 82,106 square-feet (SF) of open space, including 18,970 SF of private open space (patios, roof deck), 44,201 SF of common (residential) open space, and 18,935 SF of uncovered rooftop (amenity area) open space. A minimum of 1.1-acres of public open space would also be included.

Based on the *Dana Point General Plan* (General Plan) Land Use Map, the Project site is designated "Community Facility" (CF) and "Recreation/Open Space" (R/OS) and is situated within the Coastal Overlay Boundary.

Based on the *Dana Point Zoning Map* (Zoning Map), the Project site is zoned “Community Facilities” (CF) and “Recreation” (REC) and is situated within the Coastal Overlay boundary. The northwestern portion of the project site is also located in the Floodplain Overlay (FP-2) boundary.

### **PROJECT SCREENING CRITERIA**

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. Since the City of Dana Point currently doesn’t have adopted VMT screening criteria, the following section discusses the various screening methods recommended by the State of California in the *OPR Technical Advisory* and whether the Project will screen-out, either in its entirety, or partially based on individual land uses.

#### **Proximity to Transit Facilities**

As noted previously, the CEQA Guidelines were amended to include section 15064.3, “Determining the Significance of Transportation Impacts”. Subsection (b)(1) states in part:

*“Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.”*

Pursuant to the statute, development projects may be screened out of VMT analysis based on proximity to certain transit facilities due to the presumption of less than significant impacts. The *Technical Advisory* reiterates this screening criteria, but also highlights certain project-specific or location-specific characteristics which may indicate the project will still generate “significant levels of VMT”, even when located within one-half mile of a major transit stop or a stop along a high-quality transit corridor. These characteristics relate to the project’s floor area ratio (FAR), parking supply, and number of dwelling units, as well as consistency with the applicable Sustainable Communities Strategy (SCS). If the project has any characteristics which indicate that the presumption of less than significant impacts as stated in the CEQA Guidelines may not be appropriate, the *OPR Technical Advisory* recommends that the project should not be screened out of further VMT analysis.

*Based on the above, the proposed Project will not screen-out since it is not within one-half mile of neither an existing major transit stop<sup>1</sup> nor a stop along an existing high-quality transit corridor<sup>2</sup>.*

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<sup>1</sup> *Public Resources Code Section 21064.3*: “‘Major Transit Stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

### Small Projects

The *OPR Technical Advisory* recommends that VMT analyses be conducted for projects which are forecast to generate 110 or more average daily trips (ADT). The CEQA Guidelines provide a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet<sup>3</sup>. OPR states that “typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.” OPR thus reasons that projects which are forecast to generate fewer than 110 daily trips would be comparable to categorically exempt projects and could be presumed to cause less than significant impacts.

*Based on the above, the proposed Project will not screen-out since it generates more than 110 daily trips.*

### Map-Based Screening

An additional screening methodology is provided for residential and office land use projects. Lead agencies may prepare maps based on a regional travel demand model or travel survey data to illustrate areas that are currently below the selected VMT threshold. OPR reasons that if a project has similar characteristics to the existing area (i.e., density, mix of uses, transit service, etc.), it will tend to exhibit similar VMT. Therefore, if a project is fully located within an area identified as having a below-threshold VMT, it may be presumed to also have less than significant VMT impacts and be screened out from requiring a detailed VMT analysis.

*Based on the above, the proposed Project will not screen-out since no map-based screening is available.*

### Additional Screening Considerations

OPR provides additional recommendations on when the presumption of less than significant impacts may be appropriate, in addition to the formally recommended screening criteria described above. For instance, in the discussion regarding retail projects, the *OPR Technical Advisory* advises lead agencies that because local serving retail projects tend to improve retail destination proximity, shorten trips, and reduce VMT, they may be presumed to have less than significant impacts. Agencies may choose to define what constitutes local serving retail in their jurisdiction, although OPR suggests a threshold size of 50,000 square feet or less. Thus, lead agencies may

<sup>2</sup> *Public Resources Code Section 21155*: “For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”

<sup>3</sup> CEQA Guidelines Section 15301, Subsection (e)(2).

choose to screen out projects based on the type and size of the land use(s) being proposed.

Further, OPR states that mixed-use projects should analyze each land use individually.

*Based on the above, the proposed Project will not screen-out, thus requiring a full VMT analysis as presented in this Technical Memorandum.*

Additionally, the *OPR Technical Advisory* cites research that could support the presumption of less than significant impacts for 100% affordable housing projects, on the basis that low-wage workers are more likely to choose housing close to their workplaces, thus reducing commute distances and VMT.

*Based on the above, the proposed Project will not screen-out since it is not a 100% affordable housing project.*

**Flow Chart 1** presents the recommended screening criteria, as discussed above, for land use projects consistent with the *OPR Technical Advisory*. It should be noted that a land use project only needs to satisfy one of the screening criteria of the flow chart to qualify for screening.

## **VEHICLE MILES TRAVELED (VMT) ANALYSIS METHODOLOGY**

According to OPR, Projects that do not screen out based on the aforementioned criteria shall complete a full VMT analysis. In the absence of the City of Dana Point VMT guidelines, the VMT analysis methodology as provided by OPR has been utilized. The following summary of the guidelines has been prepared based on a review of the revisions to the CEQA Guidelines and OPR's current *Technical Advisory*.

It should be noted that according to OPR, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Here, the term "automobile" refers to on-road passenger vehicles, specifically cars, and light trucks. The primary reason being, as mentioned previously, is to align with the State's three statutory goals; (1) reduction of GHG emissions; (2) development of multi-modal networks; and (3) a diversity of land uses.

### **OPR's Guidance on Methodology for Project Impacts**

According to OPR, tour-based and trip-based approaches offer the most viable methods for determining VMT from residential projects, office project and retail projects, and for comparing those results to VMT thresholds. These approaches also

offer the simplest methodology for determining VMT reductions from mitigation measures for residential projects, office project and retail projects.

Based on the above, a full VMT analysis utilizing the Orange County Transportation Analysis Model (OCTAM) has been used to determine the VMT for the Project and for the City of Dana Point average and will provide the following:

- Home-based average VMT per Capita for residential land uses.

Finally, the Project average VMT will then be compared to the City of Dana Point average to determine whether or not the Project will have a significant impact based on the significance thresholds defined in this Technical Memorandum.

#### OPR's Guidance on Methodology for Cumulative Impacts

OPR states that a Project's cumulative impacts are based on a determination of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." When using an absolute VMT metric, i.e., total VMT, analyzing the combined impacts for a cumulative impact analysis may be appropriate. A project that falls below the threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the Project impact. Accordingly, a less than significant Project impact would imply a less than significant cumulative impact, and vice versa.

#### **VEHICLE MILES TRAVELED (VMT) SIGNIFICANCE THRESHOLDS**

As previously discussed, a project that meets the screening criteria will require preparation of a detailed transportation analysis. The project VMT will be evaluated in order to determine if the project is expected to cause a significant transportation impact. Under the VMT methodology, a transportation impact is considered significant if the project-related VMT is equal to or exceeds the thresholds.

Mitigation of project transportation impacts is required whenever VMT generated by the proposed development causes an increase of the analyzed VMT by an amount greater than the predetermined significance thresholds.

The following section discusses the VMT impact thresholds recommended by the State for residential projects, office project and retail projects.

#### OPR's Guidance on Thresholds

Public Resources Code Section 21099 provides the criteria for determining the significance of transportation impacts. There are three statutory goals that the significance criteria must promote: (1) reduction of GHG emissions; (2) development of multi-modal networks; and (3) a diversity of land uses. The *OPR Technical*



*Advisory* provides OPR's recommendations for quantitative thresholds of significance, which align with the State's three statutory goals. The recommended significance thresholds were developed from legislative mandates and state policies (i.e., AB 32, SB 375, SB 391 and a number of Executive Orders) that established quantitative GHG emissions reduction targets.

The *OPR Technical Advisory* states that a fifteen percent (15%) reduction in VMT is achievable for development projects in a variety of place types and is consistent with SB 743's direction to OPR to select a threshold that aligns with the State's three statutory goals.

### Residential Projects

For residential projects, the existing VMT per capita may be measured from city or regional averages. If city VMT per capita is used as a basis for a significance threshold in a Metropolitan Planning Organization (MPO) area, the project should not cumulatively exceed the population or number of units specified in the SCS for that city and should be consistent with the SCS. Exceeding the population or the number of units specified in the SCS would undermine the GHG reduction targets stated in SB 375.

For residential projects located in unincorporated county areas, the Technical Advisory provides additional recommendations as a basis for significance thresholds:

- "The local agency can compare a residential project's VMT to (1) the region's VMT per capita, or (2) the aggregate population-weighted VMT per capita of all cities in the region."

The Technical Advisory applies the thresholds for residential projects to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments. It should be noted that the metric used to determine project VMT and the city-wide or regional VMT must be consistent (i.e., "apples to apples" comparison).

### Thresholds of Significance

It should be noted that the *OPR Technical Advisory* provides recommendations for thresholds of significance for only three types of development, focusing only on the project types which tend to have the greatest effect on VMT. The *OPR Technical Advisory* does not provide recommendations on thresholds for other kinds of development projects. The three main development project types, residential, office, and retail may be considered proxies for developments which exhibit certain trip/travel characteristics as shown below:

- "Residential" may be considered a proxy for a development which generates new trips.

- “Office” may be considered a proxy for a development which generates primarily work trips.
- “Retail” may be considered a proxy for a development which primarily attracts already existing trips, leading to a diversion of trips rather than generating new trips.

If a project can be demonstrated to match one of these proxy categories, the applicable thresholds may be utilized. Thus, the proposed Project components are expected to generate new trips and have been analyzed under the residential threshold as listed below:

- A proposed Residential project exceeding a level of 15% below average existing regional (in this case City of Dana Point) VMT per capita may indicate a significant transportation impact.

**VEHICLE MILES TRAVELED (VMT) ANALYSIS**

Summarized below are the average VMT per values utilizing OCTAM for the City of Dana Point and the proposed Project. It should be noted that the Project is located in Traffic Analysis Zone (TAZ) 1706 and the Project development totals were converted into Socio-Economic Data (SED) and inputted into OCTAM. *Figure 4* presents the TAZ Map from OCTAM.

City of Dana Point			
Year	2016 Existing	2045 Entitled	Threshold (15% below 2045 Entitled)
VMT per capita	21.5	21.3	18.11

Project (TAZ 1706)			
Year	2016 With Project	2045 With Project	Compared to Threshold (2045 Entitled)
VMT per capita	16.8	16.9	7.23% Lower

**Project VMT Significance Thresholds**

As presented above and based on the criteria outlined in this report, the proposed Project does not exceed a level of 15% below City of Dana Point average VMT per capita threshold as the Project is 7.23% below the City of Dana Point average VMT per capita threshold and thus does not have a significant Project VMT impact for the residential land use.

Cumulative VMT Significant Impact

As previously mentioned and according to the *OPR Technical Advisory*, a less than significant Project impact would imply a less than significant cumulative impact. Hence, there is no Cumulative significant VMT impact.

**CONCLUSION**

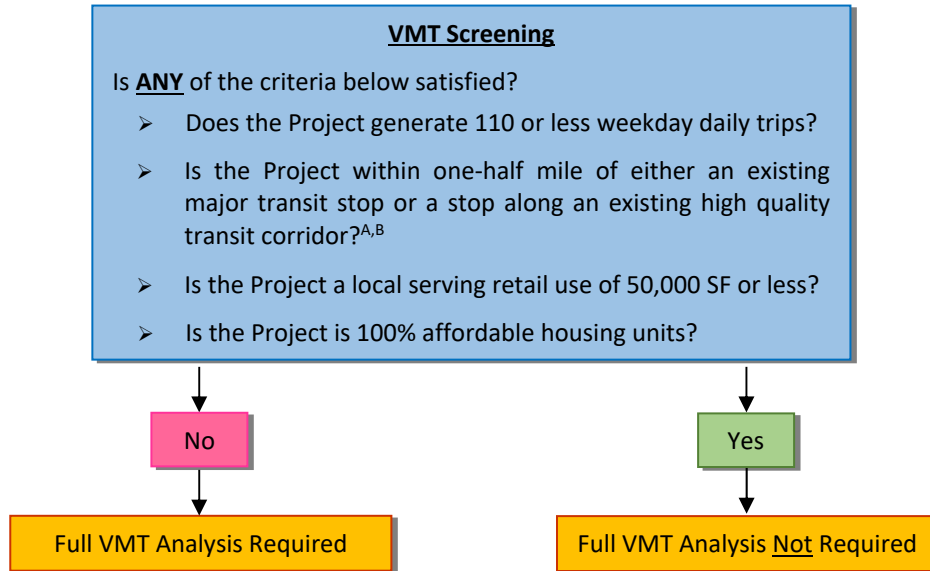
Consistent with the *OPR Technical Advisory* and based on the VMT methodology, criteria, guidelines, thresholds and results outlined in this Technical Memorandum, the proposed Project will not have a significant Project VMT impact nor a significant cumulative impact.

\* \* \* \* \*

We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the memorandum, please contact us at (949) 825-6175.

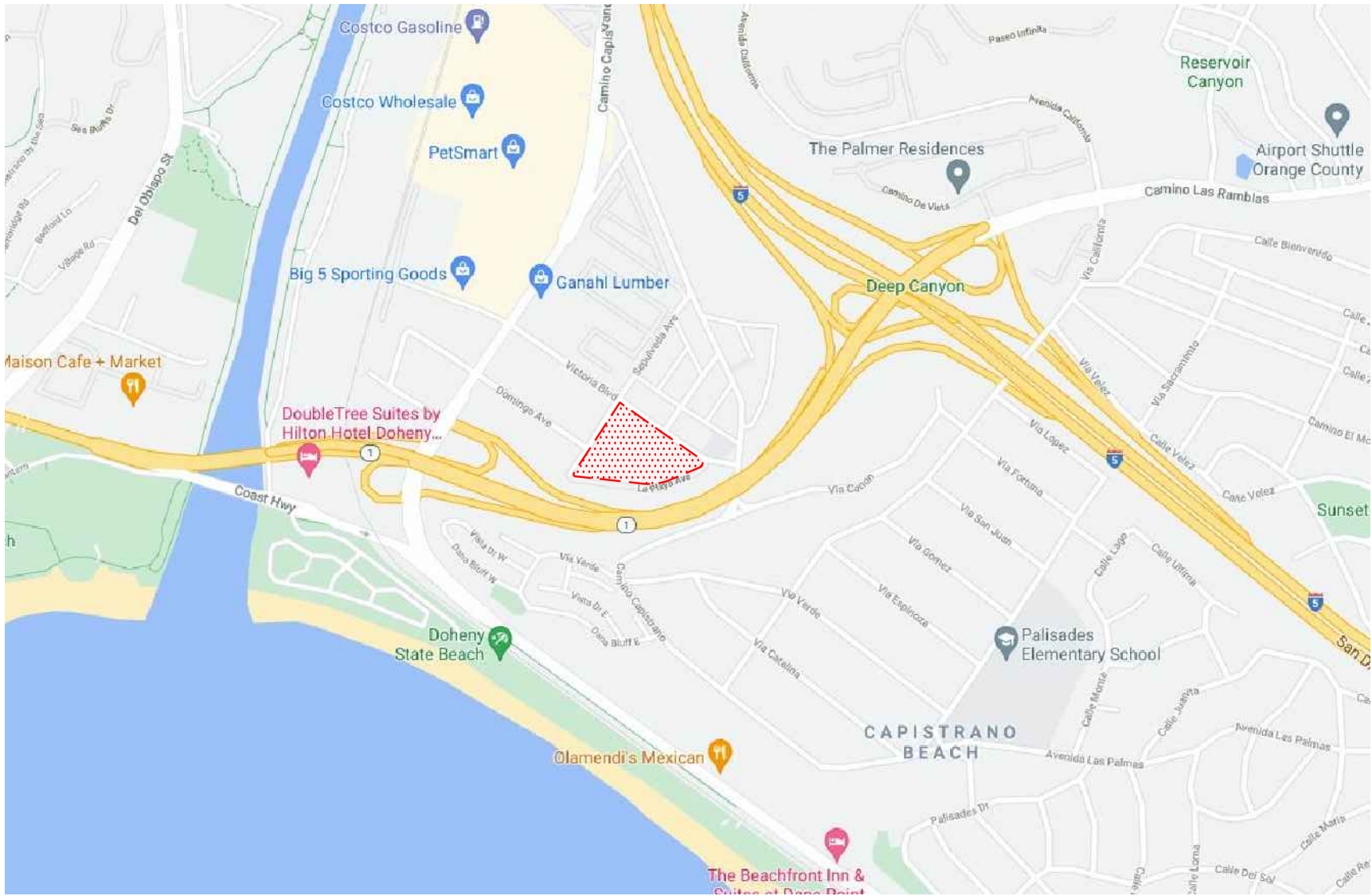
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**FLOW CHART 1**  
**VMT SCREENING CRITERIA FLOW CHART**

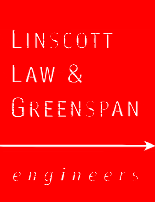


**Notes:**

- "Major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- "High-quality transit corridor" means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.



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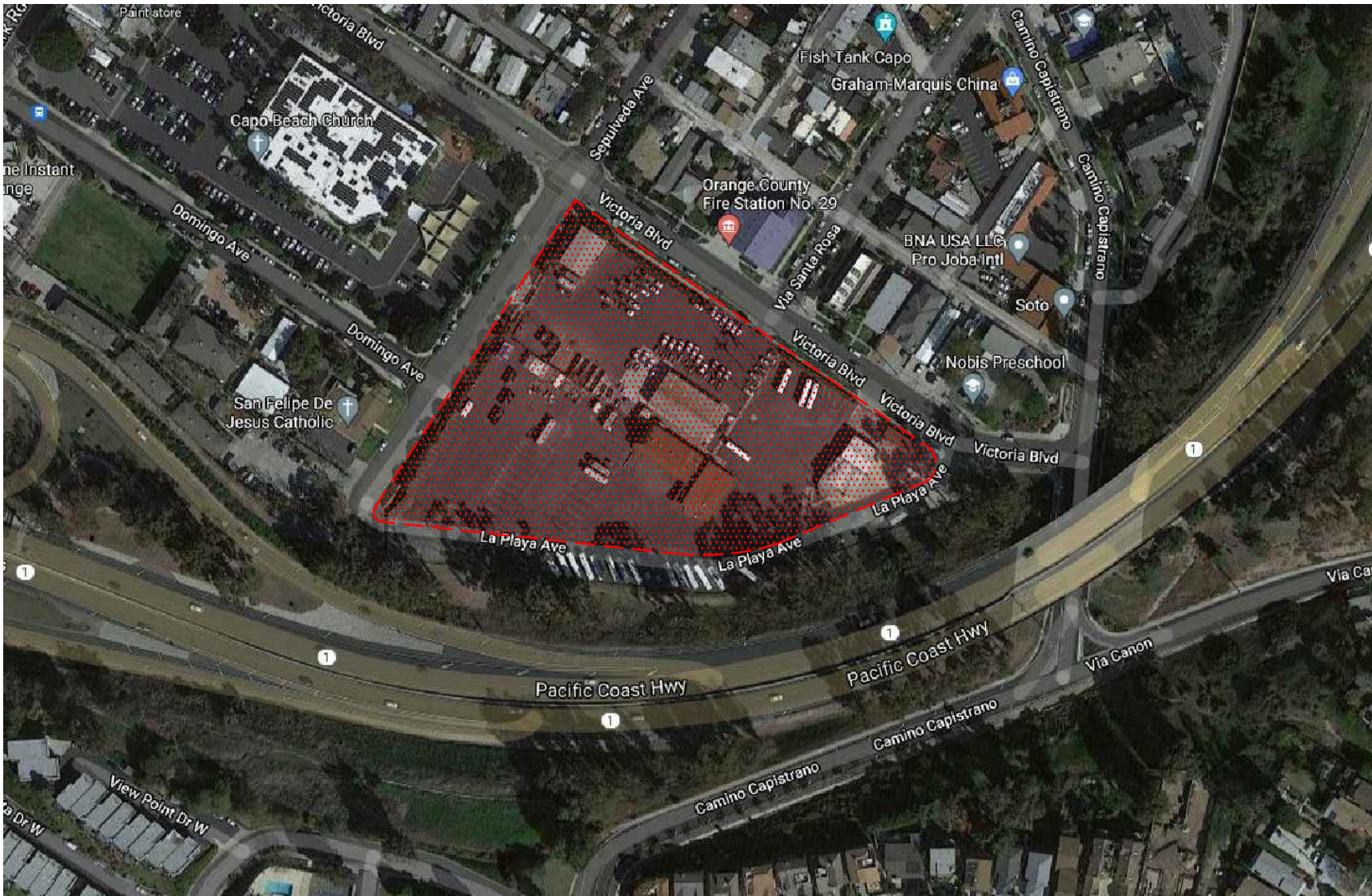
**KEY**

= PROJECT SITE

# FIGURE 1

**VICINITY MAP**  
 VICTORIA APT SPECIFIC PLAN, DANA POINT





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## FIGURE 2

**EXISTING SITE AERIAL**  
 VICTORIA APT SPECIFIC PLAN, DANA POINT

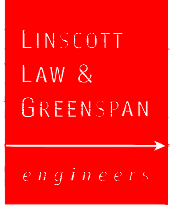





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SOURCE: MICHAEL BAKER INTERNATIONAL

# FIGURE 3



 NO SCALE

**PROPOSED SITE PLAN**  
 VICTORIA APT SPECIFIC PLAN, DANA POINT





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SOURCE: OCTA

# FIGURE 4

## TAZ MAP

VICTORIA APT SPECIFIC PLAN, DANA POINT

LINSCOTT  
LAW &  
GREENSPAN



NO SCALE

engineers