



March 12, 2021

Ms. Nicole Morse
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

SUBJECT: 534 STRUCK AVENUE VEHICLE MILES TRAVELLED (VMT) ASSESSMENT

Dear Ms. Nicole Morse:

The following Vehicle Miles Travelled (VMT) Assessment has been prepared for the 534 Struck Avenue development (referred to as "Project") located in the City of Orange.

PROJECT DESCRIPTION

It is our understanding that the Project is to consist of 57,900 square foot building with truck terminal use, which would replace the existing 40,000 square foot manufacturing use. The Project is anticipated to be constructed in one phase by the year 2022. Access to the Project site will be provided by two proposed driveways along Struck Avenue. Both driveways will serve passenger cars and heavy trucks.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020.

The City of Orange adopted their own VMT analysis guidelines and thresholds on July 14, 2020, which are described in detail in the City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City Guidelines). (1) Based on these guidelines the City has chosen to utilize the North Orange County Collaborative VMT Traffic Study Screening Tool (**Screening Tool**) that identifies VMT screening criteria for a project based on the type of land use and its location within the City. The Screening Tool is based on the screening criteria described in the adopted City Guidelines and follows those recommended by the Governor's Office of Planning and Research (OPR) in their Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory). (2) Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017. (3) The proposed Project is anticipated to generate a net total of 148 net new vehicle trip-ends per day¹.

¹ Urban Crossroads 534 Struck Avenue Traffic Assessment Letter

The focus of this memorandum is to evaluate each of the applicable screening criteria identified in the City Guidelines to determine if the Project would be expected to cause a less than significant transportation impact.

PROJECT SCREENING

The City Guidelines provides a multi-step procedure to evaluate VMT screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant transportation impact without conducting a more detailed project level VMT analysis. The screening criteria are listed as three steps:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

A land use project need only to meet one of the above screening thresholds to result in a less than significant transportation impact.

The Screening Tool was run for the Project and the results via a screen shot of the tool output is presented in Attachment "A" to this memo.

STEP 1: TRANSIT PRIORITY AREA (TPA) SCREENING

The City Guidelines state that projects located within a TPA, ½ mile of an existing "major transit stop,"² or an existing stop along a "high-quality transit corridor"³ will have a less than significant impact on VMT. According to the Screening Tool results, the proposed Project is within a TPA.

Once a project is determined to be within a TPA, the City Guidelines also recommends consideration of secondary screening checks. For example, a proposed land use project is **not** eligible for TPA screening if the project meets any of the following sub-criteria:

- 1) Has a Floor Area Ratio (FAR) of less than 0.75;
- 2) Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- 3) Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or

² Pub. Resources Code, § 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.").

³ Pub. Resources Code, § 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.").

- 4) Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The proposed Project does not meet TPA screening as its FAR is not 0.75 or greater.

The TPA screening is not met.

STEP 2: LOW VMT AREA SCREENING

As noted in the City Guidelines, “residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.”⁴ The Project is consistent with this criterion as the proposed industrial use is consistent with the existing area. The existing area is predominately office and industrial to the north, west and south of the Project site, with high density residential and industrial to the east.

The Screening Tool uses the sub-regional Orange County Transportation Analysis Model (OCTAM) to measure VMT performance within the City of Orange for individual traffic analysis zones (TAZ's). Based on the Screening Tool results (see Attachment A), the Project's physical location is reported to be located within a low VMT generating TAZ as compared to the City of Orange General Plan Buildout VMT per service population VMT impact threshold.⁵

Once a project is identified to be within a low VMT area, City Guidelines also state that the traffic analyst should ensure that the proposed Project is consistent with the land use assumptions contained in the travel demand model's traffic analysis zone (TAZ) used to measure VMT performance. The Project proposes to convert an existing manufacturing use to a warehousing use, which would be a similar type of industrial use and thus meeting the low VMT area screening criteria.

The Low VMT Area screening is met.

STEP 3: PROJECT TYPE SCREENING

The City Guidelines provides a list of project types that are presumed to have a less than significant impact absent substantial evidence to the contrary. A brief list of these project types includes:

- Local serving essential services (i.e., public schools, parks, day care centers, etc.)
- Local serving retail (less than 50,000 square feet)

⁴ Page 13 of the City Guidelines

⁵ Page 16 of the City Guidelines

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- Local serving hotels
- Assisted living facilities
- Community institutions (i.e., public libraries, fire stations, local government)
- Projects that generate less than 110 daily vehicle trips

As the proposed project is forecast to generate an additional 148 daily vehicle trips, it would exceed the 110 daily trip threshold.

The Project Type screening is not met.

CONCLUSION

Based on our review of applicable VMT screening criteria, the Project meets the low VMT area screening criteria and is presumed to exhibit similar levels of low VMT. The Project was not found to meet either the TPA or project type screening, however meeting the low VMT area screening alone is sufficient to determine a less than significant transportation impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at (949) 480-7788.

Respectfully submitted,

URBAN CROSSROADS, INC.



Aric Evatt, PTP
President



Robert Vu, PE
Transportation Engineer

REFERENCES

1. **City of Orange.** *City of Orange Traffic Impact Analysis Guidelines and Vehicle Miles Traveled and Level of Service Assessment.* 2020.
2. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.

**ATTACHMENT A:
SCREENING TOOL RESULTS**

NOCC+



North Orange County Collaborative VMT Traffic Study Screening Tool

Project Information

Project Name	Opening Year
534 Struck Warehousing Center	2021
Parcel Number (OCTAM TAZ#457)	
375-331-04	

Screening Criteria for Orange

Is the project location in a Transit Priority Area?	Yes
Is the project location in a low VMT generating zone?	Yes
Is the Project one of these land use types? (show land use types)	No
Does the project generate fewer than 110 daily trips? (enter project land use in the section below)	No

The Project can be considered for screening from additional analysis.
Please refer to the 'secondary screening checks' table in the User Guide.

Project Land Use Information

		Unit
Residential : Single Family Homes	0	Dwelling Units
Residential : MultiFamily Homes	0	Dwelling Units
Office	0.000	1,000 Square Feet
Retail	0.000	1,000 Square Feet
Industrial	230.000	1,000 Square Feet
Private School	0	Students
University	0	Students
Entertainment	0.000	1,000 Square Feet
Hotel	0	Rooms

Project Trips and VMT Information

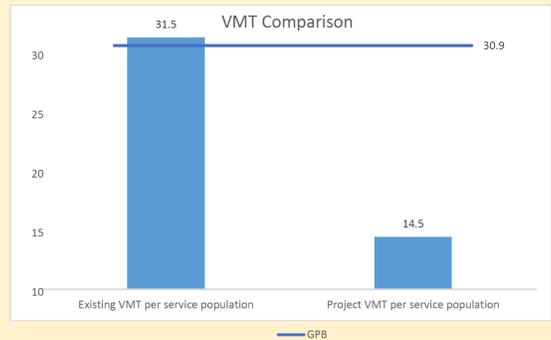
VMT Methodology

Daily Trips: 463 Average Trip Length: 7.2 Service Population: 230

VMT per service population 14.5

Project VMT Thresholds Comparison

- OPR Guidance (15% Below Existing)
- GHG Reduction Targets (14.3% Below Existing)
- Below Existing
- Better than General Plan Buildout



FEHR PEERS