



# Appendix K2

## VMT Screening Evaluation

**DATE:** January 5, 2023  
**TO:** Nicole Morse, T&B Planning, Inc.  
**FROM:** Alex So, Urban Crossroads, Inc.  
**JOB NO:** 13101-07 VMT

## **534 STRUCK AVENUE VEHICLE MILES TRAVELED (VMT) SCREENING EVALUATION**

Urban Crossroads, Inc. is pleased to provide the following Vehicle Miles Traveled (VMT) Screening Evaluation for the 534 Struck Avenue (**Project**), which is located at 534 Struck Avenue in the City of Orange.

### **PROJECT OVERVIEW**

The proposed Project consists of a 57,900 square foot building with truck terminal use, which would replace the existing 40,000 square foot manufacturing use. The Project is proposing to redevelop the site with a 57,900-square foot, 45-foot-tall truck terminal, including 52,900-square feet of warehouse space and 5,000-square feet of office uses (see Exhibit 1). The site also includes a 5,400 square foot maintenance building. The Project would construct 62 passenger car parking stalls (including 3 accessible parking spaces) and 188 trailer parking stalls (for a total of 250 parking stalls) on-site. The building is proposed to include 84 dock doors (cross-dock configuration). Vehicular access to the site would be provided via two driveways along the site's northern boundary on Struck Avenue. A preliminary site plan for the Project is shown in Attachment A.

### **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, consistent with Senate Bill 743 (SB 743). To comply with SB 743, the City of Orange has prepared their City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City Guidelines) (1). The VMT analysis presented in this report has been developed based on the adopted City Guidelines.

## VMT SCREENING

The City's Guidelines list standardized screening methods for project level VMT analysis that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact thereby eliminating the need to conduct a full VMT analysis. The City has chosen to utilize the North Orange County Collaborative VMT Traffic Study Screening Tool (**NOCC+ 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. The City of Orange VMT screening steps, as described within the City Guidelines, are listed below:

- 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 impact.

### **STEP 1: TPA SCREENING**

Consistent with guidance identified in the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"<sup>1</sup> or an existing stop along a "high-quality transit corridor"<sup>2</sup>) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- 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);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project site is located within ½ mile of an existing major transit stop, or along a high-quality transit corridor as reported by the NOCC+ Screening Tool. However, the Project does not meet the secondary criteria of having a FAR of 0.75 or higher.

**TPA screening step is not met.**

---

<sup>1</sup> 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.").

<sup>2</sup> 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.").

## **STEP 2: LOW VMT AREA SCREENING**

Consistent with 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 uses 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.”<sup>3</sup> VMT performance for the traffic analysis zones (TAZ) containing the Project was collected using the Orange County Transportation Analysis Model (OCTAM). The TAZ containing the Project (i.e., OCTAM TAZ #457) has an existing VMT per service population of 24.85 VMT per service population (See Attachment B) and the City’s impact threshold is 31.3 VMT per service population. The Project is located in a TAZ that generates VMT below the City’s VMT impact threshold.

**Low VMT Area screening step 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)
- 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

The Project does not intend to develop any of the above outlined local serving uses and is estimated to generate daily vehicle trips that would exceed the 110 daily trip threshold.

**Project Type screening step is not met.**

## **CONCLUSION**

Based on our review of applicable VMT screening thresholds, the Project meets the Low VMT Area screening criteria and would therefore be presumed to result in a less than significant VMT impact; no additional VMT analysis is required.

If you have any questions, please contact me directly at [aso@urbanxroads.com](mailto:aso@urbanxroads.com).

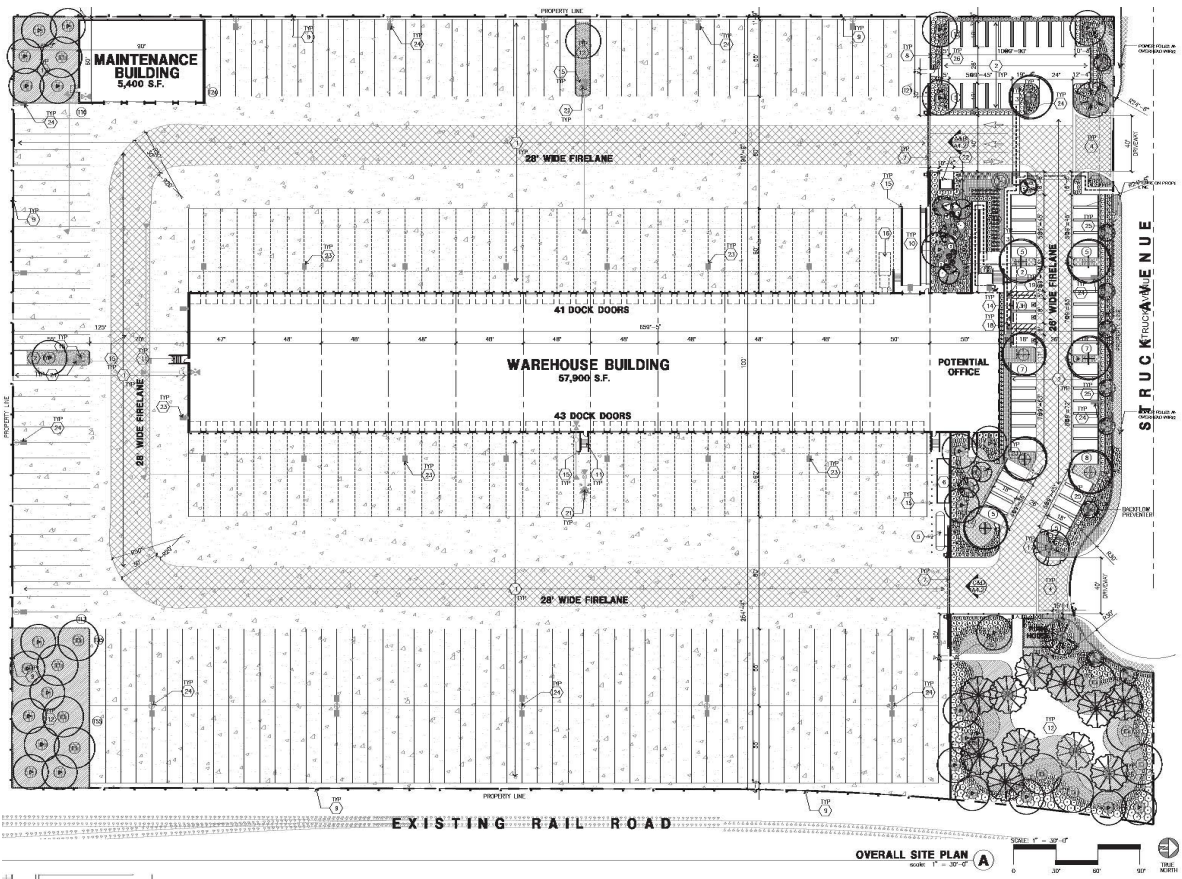
---

<sup>3</sup> City Guidelines; Page 13

## REFERENCES

1. **City of Orange.** *City of Orange Traffic Impact Analysis Guidelines and Vehicle Miles Traveled and Level of Service Assessment.* 2020.

**ATTACHMENT A**  
**PRELIMINARY SITE PLAN**



**ATTACHMENT B**  
**OCTAM MODEL OUTPUT**



**TABLE B-1: OCTAM 2016 TAZ OUTPUT**

Zone ID	457
Time Period	Daily
Home-Based VMT (PA)	13862.95917
Home-Based Work VMT (PA)	49899.21306
Other VMT (PA)	29915.733
Total VMT (OD)	98866.63597
Home-Based VMT (OD)	14630.81539
Home-Based Work VMT (OD)	52663.08337
Other VMT (OD)	31572.73721
Total Intrazonal VMT (OD)	179.2590422
Total Vehicle Trips	13090.13715
Total Intrazonal Trips	357.9352231
Average Trip Length	7.751006267
Population	1998
Employment	1980
Enrollment	0
Service Population	3978
HBVMT_per_Pop (PA)	6.938418001
HBWVMT_per_Emp (PA)	25.20162276
TOTVMT_per_SerPop (OD)	24.85335243
HBVMT_per_Pop (OD)	7.322730424
HBWVMT_per_Emp (OD)	26.59751685