

TECHNICAL MEMORANDUM

To: Ms. Mallory McGaughy
MJM Development, Inc. Date: September 2, 2021

From: Keil D. Maberry, P.E., Principal
Linscott, Law and Greenspan, Engineers LLG Ref: 2.21.4355.1

Subject: ***Final Vehicle Miles Traveled (VMT) Assessment for the Proposed
Pepperwood Place Project, Anaheim***

As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this *Final Vehicle Miles Traveled (VMT) Assessment Technical Memorandum* for the proposed Pepperwood Place project (herein after referred to as Project) in Anaheim, California. This Technical Memorandum presents the VMT screening criteria and applies the criteria, accordingly. It should be noted that the approach and methodology outlined in this Technical Memorandum is based on the *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020)* and 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 approach described in this Technical Memorandum.

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines. However, the new guidelines must be used starting July 1, 2020, as required in CEQA section 15064.3. The City of Anaheim has adopted thresholds as contained in the *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020)*.

In late 2019, State courts stated that under section 21099, subdivision (b)(2), existing law is that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

As a result of SB 743, the new metric in the CEQA guidelines for transportation impacts is VMT per capita. The legislative intent of SB 743 is to balance the needs of congestion management with statewide goals for infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.



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PROJECT DESCRIPTION

The proposed Project will consist of 12 single-family residential dwelling units on a private street with a “hammerhead” turnaround area and is expected to be completed in the Year 2022. The proposed Project is consistent with the existing land use and City of Anaheim General Plan. The proposed project site is located at 910 S. Western Avenue (i.e. generally on the east side of Western Avenue and north of Ball Road), in the City of Anaheim, California. The Project site is currently occupied with a vacant single-family home that will be demolished. Therefore, the proposed Project consists of a net eleven (11) new homes.

PROJECT SCREENING CRITERIA

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. There are several types of screening that the lead agencies can apply to effectively screen projects from project-level assessment. As such, the following guidance summarizes the potential project screening, developed for the City of Anaheim:

Type 1: Transit Priority Area (TPA) Screening

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.

The City of Anaheim has developed a TPA map, which was utilized to determine whether this Project can be screened out based on the TPA criteria.

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

Based on the above, the proposed Project will not screen-out under this criteria since while the Project site is within the TPA defined by Attachment A, attached, of the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020), the Project Floor Area Ratio is less than 0.75.

Type 2: Low VMT Area 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.

The City of Anaheim has developed a map showing low VMT-generating zones as compared to the County, which was utilized to determine whether this Project can be screened out based on the low VMT-generating area criteria. In addition, the Project must be consistent with the existing land use within that TAZ. Therefore, a review was conducted to confirm that the Project land use is consistent with the existing land use within the Orange County Transportation Analysis Model (OCTAM). The proposed Project is located in the OCTAM traffic analysis zone (TAZ) 350. **Table 1**, below, summarizes the TAZ 350 existing land uses.

TABLE 1
TAZ 350 Existing Land Use Summary[1]

Land Use	Quantity
Households	784
Retail Employment	23
Service Employment	1,037
School Employment	674

[1] Existing land use based on the Orange County Transportation Analysis Model (OCTAM) 5.0. The existing land use represents 2016 conditions.

Based on the above, the proposed Project will screen-out under this criteria since the Project site is located within a low VMT-generating area (<15% below the Orange County Average) defined by Attachment B, attached, of the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020) and the Project is consistent with the existing land use in the TAZ, which is primarily residential.

CONCLUSION

Consistent with the OPR Technical Advisory and City of Anaheim Guidelines the proposed Pepperwood Place Project will result in a less-than-significant transportation impact based on the City of Anaheim Type 2: Low VMT Area Screening.

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

Cc: File

