Appendix E – VMT Memo

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MEMORANDUM

DATE: April 27, 2021

To: Raj Patel, R3 Lodging LLC

FROM: Arthur Black, LSA

Subject: Vehicle Miles Traveled Analysis

The Boutique Hotel Project (project) proposes to construct a 75-room hotel at 1100 Ball Road within the Anaheim Resort Specific Plan area in Anaheim, California. The City of Anaheim (City) has adopted traffic impact analysis guidelines consistent with Senate Bill (SB) 743, which resulted in revisions to the California Environmental Quality Act (CEQA). These revisions require that the assessment of a project's traffic impacts consider the vehicle miles traveled (VMT) associated with a project. This memorandum presents a VMT assessment according to the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (City Guidelines).

VEHICLE MILES TRAVELED

The State revised its *State CEQA Guidelines* in January 2019. The current *State CEQA Guidelines* prescribe the evaluation of transportation impacts on a project's effect on VMT and allow for screening criteria to be considered. Simultaneous with clearance of the revised *State CEQA Guidelines*, the Governor's Office of Planning and Research (OPR) released the Technical Advisory on Evaluating Transportation Impacts in CEQA² (Technical Advisory).

On June 23, 2020, the City adopted the City Guidelines, which are consistent with the State's Technical Advisory. These adopted guidelines include screening criteria for various project types that can be screened from project-level assessment because they are presumed to have a less than significant impact. The examples of projects that could be screened include projects located in Transit Priority Areas (TPAs). A TPA is a 0.5-mile area around a major transit stop (or the intersection of two or more major bus routes) or a high-quality transit corridor (with fixed-route bus service intervals no longer than 15 minutes during peak commute hours). According to the City Guidelines, projects located within TPAs would be screened to not require project-level analysis and would be presumed to have a less than significant impact. However, the City Guidelines identify four scenarios where a presumption of less than significant impact may not be appropriate:

City of Anaheim. 2020. City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis. June.

Office of Planning and Research. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA.

- 1. If a project has a floor area ratio of less than 0.75
- 2. If a project includes more parking for use by residents, customers, or employees of the project than that required by the City
- 3. If a project is inconsistent with the Sustainable Communities Strategy (SCS)
- 4. If a project replaces affordable residential units with a smaller number of moderate- or high-income residential units

Transit Priority Area

The City Guidelines provide an illustration of TPAs in Anaheim (attached). However, the illustration of TPAs in Anaheim does not clearly indicate whether the project location falls within or outside a TPA. The Orange County Transportation Authority (OCTA) operates fixed-route bus service in Orange County, including Anaheim. Certain areas of Anaheim are also served by the Anaheim Transportation Network (ATN), which operates the Anaheim Resort Transit (ART) buses.

The project site is immediately adjacent to a bus stop served by OCTA Route 46, OCTA Route 83, and the ART Ball Road Line. LSA examined the typical operating schedule for both OCTA routes and the ART Ball Road Line. Bus schedules during typical operations are attached. Within the a.m. peak commute period (7:00 a.m. to 9:00 a.m.), eastbound OCTA Route 46 makes five stops and northbound OCTA Route 83 makes four stops at this bus stop. Within the p.m. peak commute period (4:00 p.m. to 6:00 p.m.), eastbound OCTA Route 46 makes four stops and northbound OCTA Route 83 makes four stops at this bus stop. The ART Ball Road Line typical operations include service every 20 minutes, which would add six stops at this bus stop within either peak commute period. Altogether, the bus stop immediately adjacent to the project site is served by 23 buses in the a.m. peak commute period and 22 buses in the p.m. peak commute period. This is an average of one bus every 5.5 minutes.

Because the service intervals of fixed-route bus service immediately adjacent to the project site are no longer than 15 minutes during peak commute hours, the project is within a TPA.

In addition to the bus stop immediately adjacent to the project site, it should be noted that the project site is approximately one-half mile from Harbor Boulevard. OCTA Route 43 along Harbor Boulevard also qualifies as a high-quality transit corridor, and this route appears in the City Guidelines' illustration of TPAs in Anaheim.

Floor Area Ratio

Projects located within TPAs might not be screened from detailed analysis if the floor area ratio is less than 0.75. The project would provide a floor area ratio of 2.0, which is greater than 0.75.

Parking

Anaheim Municipal Code (AMC) Section 18.42.040 establishes the parking requirements within Anaheim. The AMC requires that hotels provide 0.8 parking space per room plus 0.25 parking space for each employee servicing guest rooms. The site plan indicates that 10 employees are necessary to service guest rooms. Table A displays the parking calculation for the project. As Table A shows, the City requires the project to provide 63 parking spaces.

Table A: Municipal Code Parking Requirement

	Parking Space Rates per	Project Parking Requirements			
Land Use	Anaheim Municipal Code Section 18.42.040	Size	Unit	Required Parking Spaces	
Hotel—Room	0.80 space/guest room	75	Room	60	
Hotel—Employee	0.25 space/employee	10	Employee	2.5	
		•	TOTAL	63	

Within the parking garage, 63 striped stalls are identified, including 3 handicap-accessible spaces and 4 spaces reserved for electric vehicles. A total of 4 short-term loading/unloading stalls are provided, allowing the temporary loading/unloading of vehicles while guests check in or check out of the hotel (including loading/unloading luggage) or for rideshare/taxi services. Because the loading/unloading stalls are short-term and not parking spaces, a total of 63 parking spaces are available for use by customers or employees of the project, which is no more than would be required by the AMC.

Sustainable Communities Strategy

Land use projections in the Anaheim General Plan and the Anaheim Transportation Analysis Model were incorporated into Connect SoCal—The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by the Southern California Association of Governments (SCAG). The project is consistent with the Anaheim Resort Specific Plan, Anaheim General Plan, and Anaheim Transportation Analysis Model. Therefore, the project is consistent with the SCS.

Affordable Housing

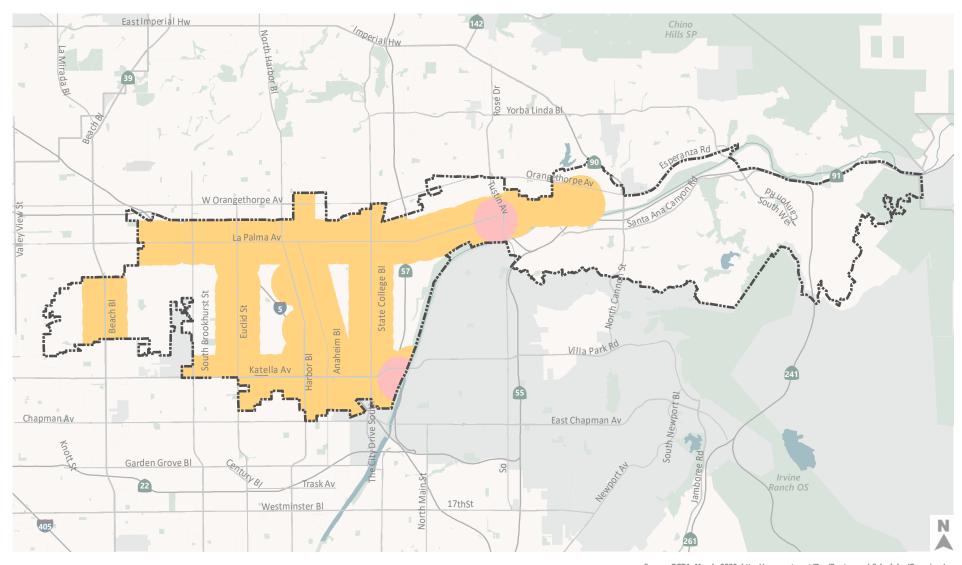
The project site currently has no affordable housing units. Therefore, the project would not replace affordable residential units with a smaller number of moderate- or high-income units.

Conclusion

Because the project site is within a TPA and meets the criteria for a less than significant VMT impact under the City Guidelines, the project would result in a less than significant impact, and a project-level VMT quantified analysis is not required under the City Guidelines.

Attachments: Transit Priority Areas (TPAs) in Anaheim

Typical Operation Bus Schedules



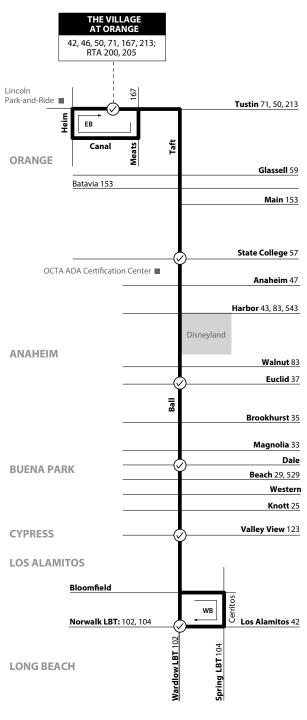


Source: OCTA, March, 2020, http://www.octa.net/Bus/Routes-and-Schedules/Overview/



Attachment A

Long Beach to Orange via Ball Rd / Taft Ave





Monday - Friday **EASTBOUND To: Orange**

Norwalk & Wardlow	Ball & Valley View	Ball & Dale	Ball & Euclid	Ball & State College	Village At Orange
4:24	4:31	4:39	4:47	4:59	5:16
5:01	5:08	5:17	5:27	5:41	6:00
5:36	5:43	5:52	6:02	6:16	6:35
6:00	6:07	6:16	6:26	6:40	6:59
6:30	6:40	6:50	7:02	7:20	7:42
6:54	7:04	7:14	7:26	7:44	8:06
7:24	7:35	7:48	8:02	8:21	8:41
7:54	8:05	8:18	8:32	8:51	9:11
8:21	8:31	8:42	8:56	9:14	9:35
8:51	9:01	9:12	9:26	9:44	10:05
9:21	9:31	9:42	9:56	10:14	10:35
9:53	10:03	10:14	10:26	10:43	11:05
10:26	10:36	10:47	10:59	11:16	11:38
10:59	11:09	11:20	11:32	11:49	12:11
11:32	11:42	11:53	12:05	12:22	12:44
12:02	12:12	12:23	12:35	12:52	1:14
12:35	12:45	12:56	1:08	1:25	1:47
1:08	1:18	1:29	1:41	1:58	2:20
1:41	1:51	2:02	2:16	2:36	2:58
2:17	2:27	2:38	2:52	3:12	3:34
2:54	3:04	3:15	3:29	3:49	4:11
3:25	3:35	3:46	3:59	4:16	4:38
3:58	4:08	4:19	4:32	4:49	5:11
4:32	4:42	4:53	5:06	5:23	5:45
4:55	5:05	5:16	5:29	5:46	6:08
5:18	5:28	5:39	5:52	6:09	6:31
5:48	6:00	6:10	6:22	6:38	6:57
6:22	6:31	6:41	6:52	7:06	7:25
6:52	7:01	7:11	7:22	7:36	7:55
7:35	7:44	7:54	8:05	8:19	8:38
8:50	8:59	9:09	9:20	9:34	9:53
10:00	10:08	10:16	10:25	10:38	10:56

- Orange - The Village at Orange
- Lincoln Park-and-Ride
- Orange Library

Anaheim

- OCTA ADA Certification Center
- Disneyland
- Ball Junior High School
- Trident Continuation High School
- Loara High School
- Magnolia High School Anaheim General Hospital
- Western Medical Center-Anaheim
- Dale Junior High School
- Western High School

Cypress

SERVICE TO / SERVICIO A

- Cypress High School
- Cypress Plaza East
- Oxford Academy
- Lexington Junior High School

Los Alamitos

- Continuation High School - Los Alamitos High School
- McAuliffe Middle School
- Oak Middle School

Long Beach

Monday - Friday WESTBOUND To: Long Beach

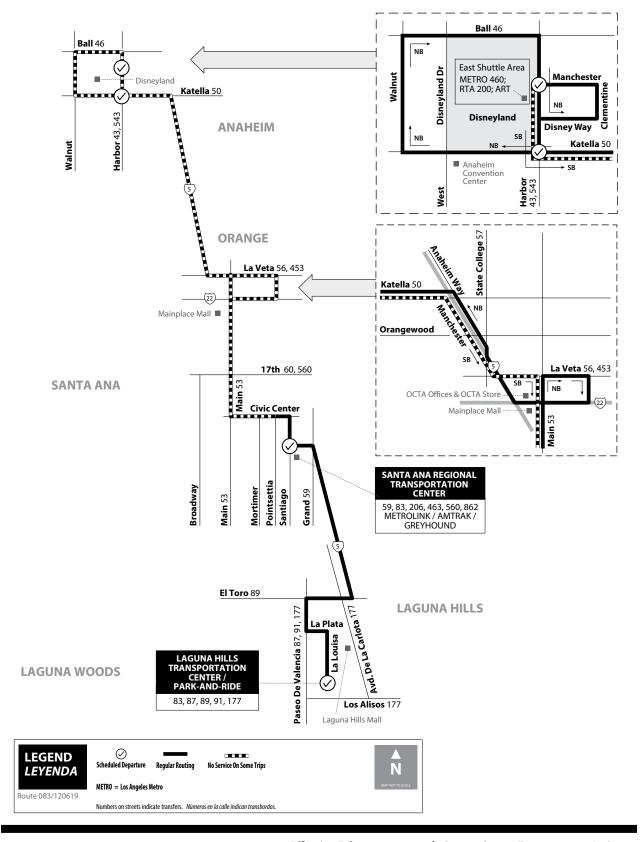
Village At Orange	Ball & State College	Ball & Euclid	Ball & Dale	Ball & Valley View	Norwalk & Wardlow
4:56	5:09	5:20	5:28	5:36	5:46
5:26	5:39	5:50	5:58	6:06	6:16
5:50	6:04	6:15	6:24	6:33	6:44
6:13	6:27	6:40	6:50	7:00	7:12
6:32	6:46	6:59	7:09	7:19	7:31
6:57	7:14	7:30	7:41	7:52	8:04
7:28	7:45	8:00	8:12	8:22	8:34
7:58	8:15	8:30	8:42	8:52	9:04
8:28	8:45	9:00	9:12	9:22	9:34
8:58	9:15	9:30	9:41	9:52	10:03
9:21	9:38	9:53	10:04	10:15	10:26
9:45	10:01	10:16	10:27	10:38	10:49
10:15	10:31	10:46	10:57	11:08	11:19
10:45	11:01	11:16	11:27	11:38	11:49
11:19	11:35	11:50	12:01	12:12	12:23
11:48	12:07	12:24	12:36	12:47	12:58
12:21	12:40	12:57	1:09	1:20	1:31
12:54	1:13	1:30	1:42	1:53	2:04
1:24	1:46	2:03	2:18	2:30	2:44
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4:21	4:42	5:01	5:13	5:25	5:38
4:51	5:12	5:31	5:43	5:55	6:08
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5:57	6:14	6:30	6:41	6:51	7:01
6:21	6:38	6:54	7:05	7:15	7:25
7:07	7:24	7:40	7:51	8:01	8:11
7:41	7:56	8:11	8:21	8:30	8:40
8:51	9:06	9:21	9:31	9:40	9:50
10:03	10:17	10:31	10:39	10:47	10:56
11:08	11:22	11:36	11:44	11:52	12:01

Saturday, Sunday & Holiday EASTBOUND To: Orange

	Norwalk & Wardlow	Ball & Valley View	Ball & Dale	Ball & Euclid	Ball & State College	Village At Orange
Ī	6:30	6:38	6:48	7:00	7:16	7:34
١	7:25	7:33	7:43	7:55	8:11	8:29
١	8:17	8:26	8:37	8:50	9:07	9:29
١	9:12	9:21	9:32	9:45	10:02	10:24
١	10:07	10:16	10:27	10:40	10:57	11:19
1	11:02	11:11	11:22	11:35	11:52	12:14
	11:57	12:06	12:17	12:30	12:47	1:09
	12:52	1:01	1:12	1:25	1:42	2:04
	1:47	1:56	2:07	2:20	2:37	2:59
l	2:40	2:50	3:01	3:14	3:32	3:54
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	7:19	7:29	7:38	7:50	8:04	8:20
	8:14	8:24	8:33	8:45	8:59	9:15
1	9:09	9:19	9:28	9:40	9:54	10:10
Į	10:04	10:14	10:23	10:35	10:49	11:05

Saturday, Sunday & Holiday WESTBOUND To: Long Beach

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	Village At Orange	Ball & State College	Ball & Euclid	Ball & Dale	Ball & Valley View	Norwalk & Wardlow
Ì	7:00	7:15	7:29	7:40	7:50	8:01
١	7:55	8:10	8:24	8:35	8:45	8:56
l	8:47	9:02	9:19	9:31	9:41	9:52
l	9:39	9:56	10:14	10:26	10:37	10:48
l	10:34	10:51	11:09	11:21	11:32	11:43
I	11:29	11:46	12:04	12:16	12:27	12:38
١	12:24	12:41	12:59	1:11	1:22	1:33
l	1:19	1:36	1:54	2:06	2:17	2:28
١	2:14	2:31	2:49	3:01	3:12	3:23
l	3:09	3:26	3:44	3:56	4:07	4:18
١	4:04	4:21	4:39	4:51	5:02	5:13
I	5:01	5:17	5:34	5:46	5:56	6:06
l	5:56	6:12	6:29	6:41	6:51	7:01
l	6:51	7:07	7:24	7:36	7:46	7:56
I	7:50	8:05	8:19	8:29	8:38	8:47
	8:45	9:00	9:14	9:24	9:33	9:42
1	9:40	9:55	10:09	10:19	10:28	10:37
Į	7.70					



Monday - Friday NORTHBOUND To: Anaheim

Laguna Hills Trans- portation Center	Santa Ana & Santiago	Santa Ana Mainplace	Katella & Harbor	Manchester & Harbor
4:47	5:08	5:16	5:28	5:45
5:22	5:43	5:51	6:03	6:20
5:51	6:13	6:25	6:39	6:59
6:09	6:31	0.23	0.39	0.39
6:24		6:58	7.12	7,22
	6:46	0:56	7:12	7:32
6:39	7:01	7.20	7.42	0.00
6:54	7:16	7:28	7:42	8:02
7:04	7:31			
7:19	7:46	7:59	8:14	8:34
7:34	8:01			
7:49	8:16	8:29	8:44	9:04
8:04	8:31			
8:22	8:46	8:59	9:13	9:30
8:37	9:01	9:14	9:28	9:45
8:52	9:16			
9:07	9:31	9:44	9:58	10:15
9:37	10:01	10:14	10:28	10:45
10:07	10:31	10:44	10:58	11:15
10:37	11:01	11:14	11:28	11:45
11:07	11:31	11:44	11:58	12:15
11:37	12:01	12:16	12:31	12:48
12:07	12:31	12:46	1:01	1:18
12:37	1:01	1:16	1:31	1:48
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4:09	4:51			
4:24	5:06	5:24	5:42	6:03
4:40	5:22			
4:58	5:40	5:53	6:07	6:26
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10:36	10:57	11:06	11:18	11:35
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Monday - Friday SOUTHBOUND To: Laguna Hills

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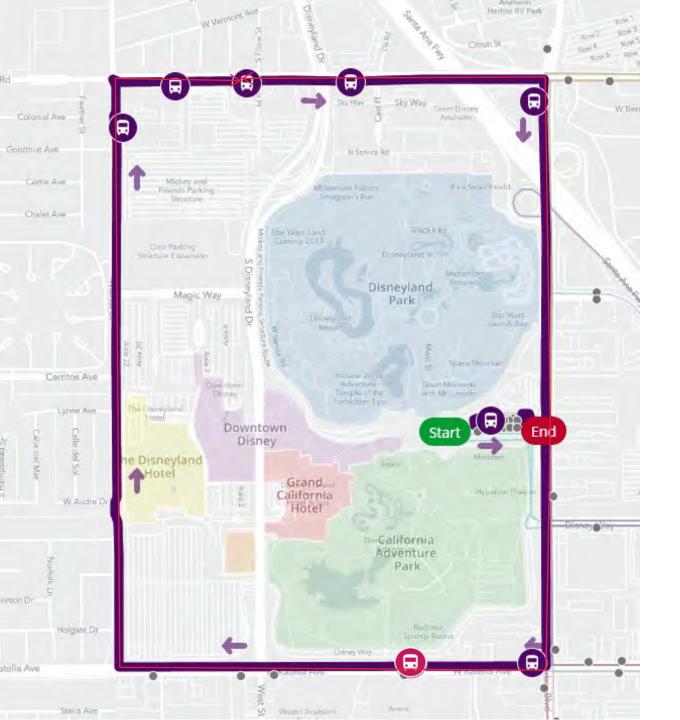
Saturday NORTHBOUND To: Anaheim

Laguna Hills Trans- portation Center	Santa Ana & Santiago	Santa Ana Mainplace	Katella & Harbor	Manchester & Harbor
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10:53	11:14	11:22	11:34	11:54

S = Operates Monday, Tuesday, Wednesday, Thursday when OC School of the Arts is in session/*Hay servicio lunes, martes, miércoles, y jueves cuando la escuela OC High School of the Arts está en sesión.*

^{* =} Trips terminating at Flower & 6th may pass this location earlier than shown.

⁼ Viajes que terminan en Flower y 6th pueden pasar en esta ubicación antes de lo que se muestra.



Ball Road Line

- **❖** 3.83 miles
- 2 vehicles
- 29.93 hours / day
- ♦ 10,926 hours / year
- 265 miles / day
- 96,870 miles / year
- \$ \$1805 / avg daily cost
- \$1,932 / avg daily revenue
- \$659,056 / annual operating cost
- 9 stops, 2,530 ft apart
 - Within 0.02 mi of stops:
 - 39 avg. hourly passengers
 - 495 avg daily ridership
 - ❖ 180,675 annual ridership
 - 813 hotel rooms served
- Frequency: Every 20 minutes

