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MEMORANDUM

DATE: July 16, 2021

TO: Maria Korkosz, Lennar

FROM: Arthur Black, LSA

SUBJECT: Transportation Analysis for A-Town Parcel B

LSA has reviewed the comment letter provided by the City of Anaheim (City) on December 22, 2020 that is related to the application to construct 270 multifamily residential units and 21,640 square feet (sf) of ground-floor commercial space (with an additional 505 sf outdoor dining area) within Development Area B of the A-Town Master Site Plan in the Platinum Triangle. The City identified a requirement for a vehicle miles traveled (VMT) screening assessment. This memorandum presents a VMT screening assessment according to *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act (CEQA) Analysis* (June 2020) (City's Guidelines).

VEHICLE MILES TRAVELED

The State revised its *State CEQA Guidelines* in January 2019. Among the revisions, vehicle delay and level of service (LOS) analysis have been removed from consideration under CEQA. The current *State CEQA Guidelines* prescribe the evaluation of transportation impacts on a project's effect on VMT. Simultaneous with clearance of the revised *State CEQA Guidelines*, the Governor's Office of Planning and Research (OPR) released the *Technical Advisory for Evaluating Transportation Impacts under CEQA* (OPR 2018).

On June 23, 2020, the City adopted the City's 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 local serving retail projects (including markets, restaurants, personal services, and retail sales) less than 50,000 sf (Type 3 screening: Project Type Screening) and projects located in Transit Priority Areas (TPAs) (Type 1 screening). A TPA is a 0.5-mile area around a major transit stop (such as the Anaheim Regional Transportation Intermodal Center [ARTIC] 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's 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's Guidelines identify four scenarios where a presumption of less than significant impact for projects within a TPA may not be appropriate:

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; or

4. If a project replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Although not stated in the City's Guidelines, the State's Technical Advisory states that "lead agencies can evaluate each component of a mixed-use project independently." This assessment of the project's potential impacts to VMT evaluates the retail and residential components independently.

Retail

The proposed project is constructing 21,640 sf of retail (with an additional 505 sf outdoor dining area). The single largest component is a market, but additional space could be provided for retail, restaurant, or personal service businesses. All would be local serving. Because the retail component of the project is less than 50,000 sf and local serving, the retail component of the project qualifies for Type 3 screening as defined in the City's Guidelines.

Residential

The project site is located in a TPA and qualifies for Type 1 screening. ARTIC is the train station for the Amtrak national train service and Metrolink commuter rail and also serves as a bus transfer station and a link to the Santa Ana River Trail off-street bike path. While ARTIC is located more than 0.5 mile from the project site, other transit options connect the project site to this major transit stop. The Orange County Transportation Authority (OCTA) operates fixed route bus service in Orange County, including Anaheim. Within the vicinity of the project site, two OCTA routes qualify as high-quality transit corridors. Route 50 operates primarily along Katella Avenue and has a stop at ARTIC, while Route 57 operates primarily along State College Boulevard. Both routes appear in the City Guidelines' illustration of TPAs in Anaheim (attached). It should be noted that a pedestrian entrance to the residential component of the project would be immediately adjacent to a Route 50 bus stop. Therefore, the residential component of the project would be screened from further analysis unless conditions are present that would make a presumption of less than significant impact inappropriate.

Floor Area Ratio

According to the project data, the project includes approximately 275,160 sf of net rentable areas and a total building size of 420,856 sf within the 3.2-acre (139,530 sf) lot. The project would provide a floor area ratio of 3.0, which is greater than 0.75.

Parking

In 2015, the City approved the revised A-Town Master Plan and entered into a Development Agreement with Lennar. At that time, the Platinum Triangle Mixed-Use Overlay Zone (Anaheim Municipal Code [AMC] Section 18.20.120) established residential parking ratios that were different from AMC Section 18.42.030. Subsequent to approval of the A-Town Master Plan and entering into the Development Agreement, the City has amended AMC Section 18.20.120, which now refers to AMC Section 18.42.030 for calculation of required residential parking. However, the parking rates established at the time of approval of the A-Town Master Plan apply to Parcel B and other

subsequent final site plans. Nonresidential parking requirements established in AMC Section 18.42.040 have also been updated since approval of the A-Town Master Plan. The AMC currently requires 4 spaces per 1,000 sf of commercial retail centers over 10,000 sf as long as restaurant space accounts for 40 percent or less of the total space. Previously, the AMC required 5.5 spaces per 1,000 sf for retail uses (including markets) and 8 spaces per 1,000 sf for restaurants integrated into a shopping center.

Table A illustrates the residential parking required by the current AMC, the commercial parking currently required by the AMC, and (for informational purposes) the residential parking rates the project is entitled to apply. As Table A shows, the AMC would require that the project provide 565 residential parking spaces and 654 parking spaces overall.

Table A: Development Area B Required Residential Parking

		Municipal Code Requirement		Previously Approved Rates	
	Units	**Parking Rate**	**Required Parking**	**Parking Rate**	**Required Parking**
Studio	0	1.25	0	1.25	0
1 bedroom	169	2.0	338	1.5	253.5
2 bedrooms	101	2.25	227.25	2.0	202
3 bedrooms	0	3.0	0	2.5	0
Total Residential	**270**	**–**	**565**	**–**	**456**
Market	16,163 sf	4 per 1,000 sf	64.7	–	–
In-line Retail	5,477 sf	4 per 1,000 sf	21.9	–	–
Outdoor Dining	505 sf	4 per 1,000 sf	2.0	–	–
Total Retail	**21,640 sf**	**–**	**89**	**–**	**–**
Total Municipal Code Requirement	**–**	**–**	**654**	**–**	**–**

sf = square feet

While one parking structure is being constructed to accommodate both residential and commercial parking demand, the residential and commercial parking areas are entirely separated, including separate entrances/exits. The residential portion of the parking structure would supply approximately 466 parking spaces, while the commercial portion of the parking structure would supply approximately 142 parking spaces.

The project anticipates providing approximately 466 residential parking spaces, which are fewer than the 565 residential parking spaces required by the AMC. The total 608 total parking spaces provided by the project are similarly fewer than the 654 total parking spaces 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 A-Town Master Site Plan, the Anaheim General Plan, and the Anaheim Transportation Analysis Model. Therefore, the project is consistent with the SCS.

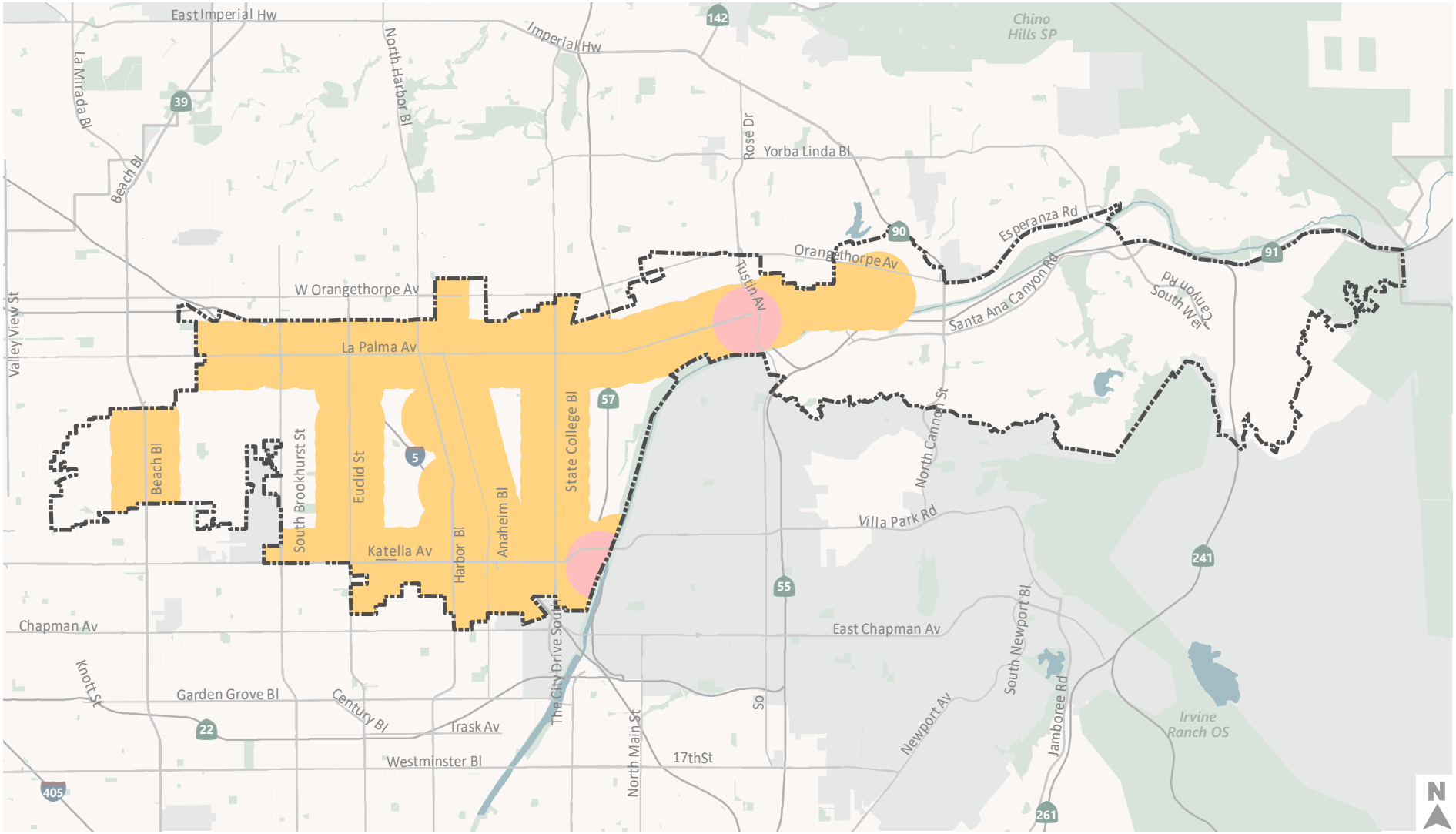
Affordable Housing

The project site is vacant and currently has no affordable housing units. The project is constructing 270 new residential dwelling units. Therefore, the project would not replace affordable residential units with a smaller number of moderate- or high-income units.

Conclusion

Because the retail portion of the project qualifies for Type 3 screening and the residential portion qualifies for Type 1 screening (and meets the criteria for a less than significant VMT impact under the City's Guidelines), the project would result in a less than significant impact, and a project-level VMT quantified analysis is not required under the City's Guidelines.

Attachment: Transit Priority Areas (TPAs) in Anaheim



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

Anaheim

Metrolink Stations

HQT Bus Stops Buffer(0.5 mile)

ANAHEIM

Attachment A

Transit Priority Areas (TPAs) in Anaheim