

MEMORANDUM

DATE: July 16, 2021
To: Maria Korkosz, Lennar
FROM: Arthur Black, LSA
SUBJECT: Transportation Analysis for A-Town Parcel E

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 257 multi-family residential units within Development Area E 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 projects located in Transit Priority Areas (TPAs). 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 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.

The project site is located in a TPA. 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 project would be immediately adjacent to a Route 57 bus stop.

Floor Area Ratio

According to the project data, the project includes 179,904 square feet (sf) of net rentable space and a total building size of 447,358 sf within the 3.2-acre (139,530 sf) lot. The project would provide a floor area ratio of 3.21, 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 E and other subsequent final site plans. Table A illustrates the parking required by the current AMC and the parking rates the project is entitled to apply. The project anticipates providing approximately 396 parking spaces, which is fewer than would be required by the AMC.

Table A: Development Area E Required Parking

	Units	Municipal Code Requirement		Previously Approved Rates	
		Parking Rate	Required Parking	Parking Rate	Required Parking
Studio	86	1.25	107.5	1.25	107.5
1 bedroom	121	2.0	242	1.5	181.5
2 bedrooms	50	2.25	113	2.0	100
3 bedrooms	0	3.0	0	2.5	0
Total	257		463		389

Sustainable Communities Strategy

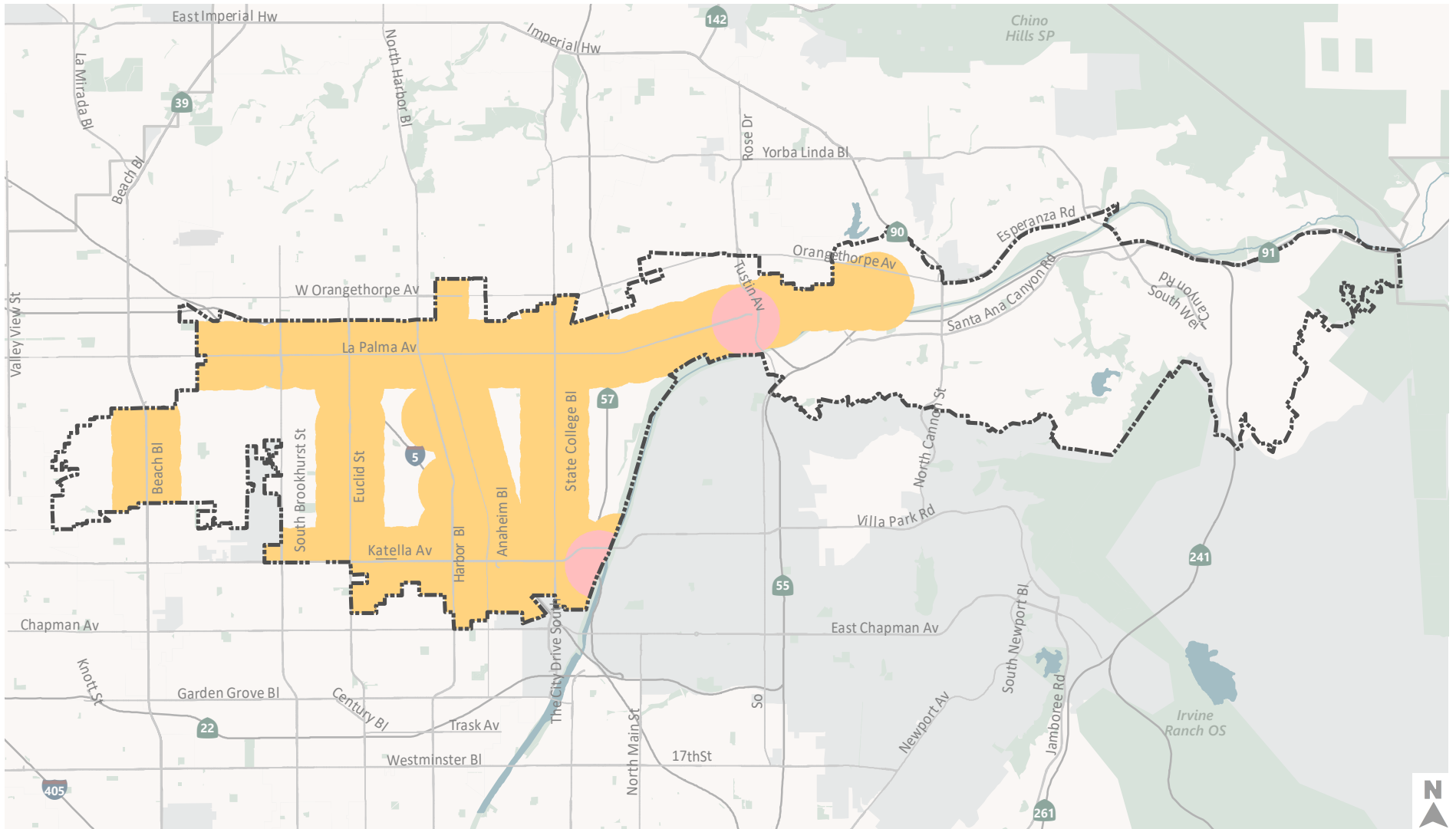
Land use projections in the Anaheim General Plan and the Anaheim Transportation Analysis Model were incorporated into Connect SoCal – The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by the Southern California Association of Governments (SCAG). The project is consistent 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 257 new residential dwelling units. Therefore, the project would not replace affordable residential units with a smaller number of moderate- or high-income units.

Because the project site is within a transit priority area 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)

