



MEMORANDUM

DATE: August 24, 2021

TO: Vivian Extale, Lennar Homes of California

FROM: Arthur Black, LSA

SUBJECT: Transportation Analysis for A-Town Development Area F (DEV2021-00131)

LSA has reviewed the comment letter provided by the City of Anaheim (City) on July 20, 2021, that is related to the application to construct 73 multifamily residential units within Development Area F of the A-Town Master Site Plan in the Platinum Triangle.

The City identified a requirement for a trip generation memorandum summarizing the trips associated with the project site and identifying whether a traffic study is required. The City's *Criteria for Preparation of Traffic Impact Studies* states that a traffic impact analysis (TIA) would be needed for a project that would generate 100 or more a.m. or p.m. peak-hour trips, would contribute 51 or more peak-hour trips to any Congestion Management Program (CMP) monitored intersection, would generate 1,600 daily trips if located on the CMP highway system, or would generate 2,400 daily trips if adjacent to the CMP highway system. The Orange County CMP includes the intersections created by the Interstate 5 (I-5) ramps at Katella Avenue and the State Route 57 (SR-57) ramps at Katella Avenue.

The City also identified a requirement for a vehicle miles traveled (VMT) screening assessment. This memorandum presents a VMT screening assessment according to the *City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act (CEQA) Analysis* (June 2020) (City's Guidelines).

PROJECT DESCRIPTION

The proposed project is part of the A-Town Master Plan that was included in Addendum No. 4 to *Subsequent Environmental Impact Report 339* (SEIR 339). A-Town is located between Katella Avenue and Gene Autry Way west of State College Boulevard. Development Area F occupies the southeast corner of the A-Town site. The proposed project will construct 73 townhome dwelling units (39 three-bedroom units and 34 four-bedroom units) in a total of 17 buildings. The proposed project will also construct a 7,802-square-foot (sf) recreation center that will include a swimming pool and 745 sf ancillary building.

TRIP GENERATION

The proposed final site plan for Development Area F includes 73 for-sale attached dwelling units within 4.34 acres. LSA examined the trip generation potential of the proposed project by referencing trip generation rates found in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition (ITE 2017). ITE Land Use 220, Multifamily Housing (Low-Rise), includes "apartments, townhouses, and condominiums located within the same building with at least three

other dwelling units and that have one or two levels.” Because the proposed dwelling units would be attached, LSA selected this land use as the most appropriate. It should be noted that trip rates for Land Use 221, Multifamily Housing (Mid-Rise), were lower than the selected trip rates. Table A presents the anticipated trip generation for the proposed project.

Table A: Trip Generation

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates¹									
Multifamily Housing (220)	–	DU	7.32	0.11	0.35	0.46	0.35	0.21	0.56
Trip Generation									
<i>Proposed Project</i>									
Development Area F	73	DU	534	8	26	34	26	15	41
New Trip Generation			534	8	26	34	26	15	41

¹ Trip rates are referenced from the Institute of Transportation Engineers *Trip Generation Manual*, 10th Edition (2017).
 ADT = average daily trips
 DU = dwelling units

Table A shows that the anticipated trip generation for Development Area F is 534 daily trips, of which 34 trips would occur in the a.m. peak hour and 41 trips would occur in the p.m. peak hour.

The trip distribution for the Master Site Plan traffic analysis showed 15 percent of traffic destined northbound on I-5 and 10 percent of traffic destined westbound on Katella Avenue. Since 25 percent of project traffic is distributed toward the CMP intersections of the I-5 ramps with Katella Avenue, a maximum of 10 trips (25 percent x 41 p.m. peak-hour trips) could potentially travel through these intersections.

The trip distribution for the Master Site Plan traffic analysis showed 15 percent of traffic destined northbound on SR-57 and 5 percent of traffic destined eastbound on Katella Avenue. Since 20 percent of project traffic is distributed toward the CMP intersections of the SR-57 ramps with Katella Avenue, a maximum of 8 trips (20 percent x 41 p.m. peak-hour trips) could potentially travel through these intersections.

Because Development Area F is anticipated to generate fewer than 100 peak-hour trips and contribute fewer than 51 trips to any CMP intersection, the project trip generation is below the threshold established for analysis by the City’s traffic study 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
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).

Floor Area Ratio

According to the project data, the proposed project includes 143,549 sf of floor area in the residential buildings and a 7,802 sf recreation center, for a total of 151,351 sf net floor area within the 4.34-acre (189,138 sf) lot. The proposed project would provide a floor area ratio of 0.80, 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 F and other

subsequent final site plans. Table B illustrates the parking required by the current AMC and the parking rates the proposed project is entitled to apply. The proposed project anticipates providing approximately 217 parking spaces, which are fewer than would be required by the AMC.

Table B: Development Area F Required Parking

Unit Type	Units	Municipal Code Requirement		Previously Approved Rates	
		Parking Rate	Required Parking	Parking Rate	Required Parking
3 bedrooms	39	3.0	117	2.5	97.5
4 bedrooms	34	3.5	119	3.5	119.0
Total	73		236		217 (216.5)

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 proposed project is consistent with the A-Town Master Site Plan, the Anaheim General Plan, and the Anaheim Transportation Analysis Model. Therefore, the proposed project is consistent with the SCS.

Affordable Housing

The project site is vacant and currently has no affordable housing units. The proposed project is constructing 73 new residential dwelling units. Therefore, the proposed 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 proposed project would result in a less than significant impact, and a project-level VMT quantified analysis is not required under the City’s Guidelines.

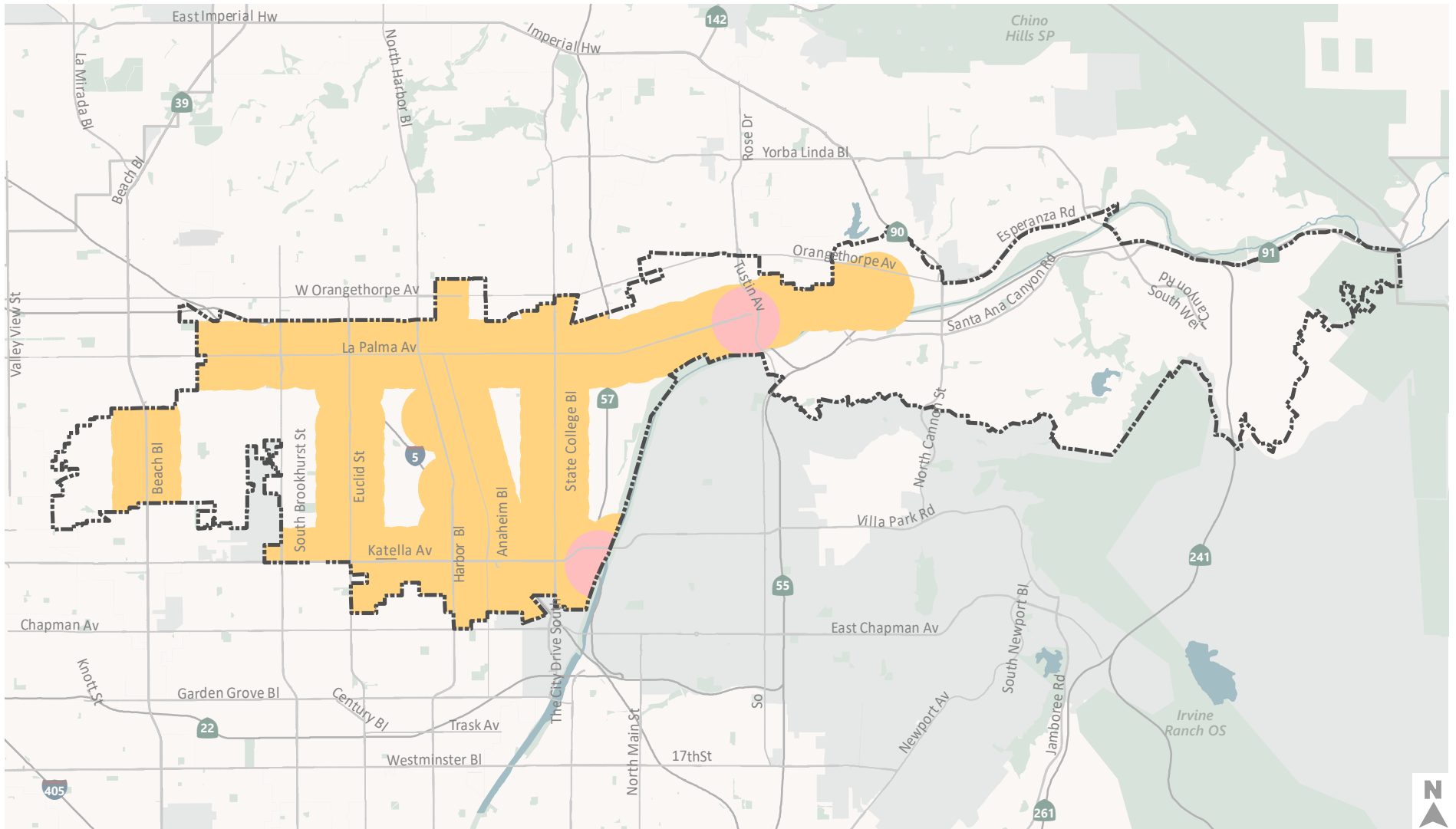
CONCLUSION




Because the proposed project would not generate 100 or more a.m. or p.m. peak-hour trips and does not have the potential to add 51 or more peak-hour trips to any CMP-monitored intersection or to add 1,600 daily trips to the CMP system, LSA does not believe that the proposed project meets the criteria for requiring a TIA. In addition, the proposed project would be assumed to have a less than significant impact on transportation according to State guidance on evaluating transportation impacts under CEQA. The City’s recently adopted guidelines for evaluating CEQA impacts also screen the proposed project from more detailed VMT analysis.

Attachment: Transit Priority Areas (TPAs) in Anaheim

ATTACHMENT A

TRANSIT PRIORITY AREAS (TPAS) IN ANAHEIM



-  Anaheim
-  Metrolink Stations
-  HQT Bus Stops Buffer(0.5 mile)

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

