4.15 TRANSPORTATION

This section is based in part on the following document:

- LLG 2024a. Traffic Impact Analysis. Santa Ana, CA: LLG. Attached as Appendix L.
- LLG 2024b. Vehicle Miles Traveled (VMT) Analysis for the Hills Preserve Project. Santa Ana, CA: LLG. Attached as Appendix T.

4.15.1 EXISTING CONDITIONS

Regional Setting

The Project Site is located south of Santa Ana Canyon Road and west of Festival Drive in the City of Anaheim within Orange County, California. The Project Site is regionally accessible from the State Route (SR) 91 and Weir Canyon Interchange located approximately 0.63 mile east of the Project Site. The Project Site is also accessible from the SR-91 and Imperial Highway Interchange located approximately 1.86 miles to the west, and the SR-91 and Coal Canyon Interchange located approximately 2.53 miles to the east.

Existing Roadway Network

The Project Site is located immediately south of Santa Ana Canyon Road.

The Project Site consists mostly of undeveloped lands, with no existing on-site buildings. There is a private paved maintenance access road ("Deer Canyon Road") that is located within the western portion of the Project Site that connects to Santa Ana Canyon Road in the north. There are also private dirt access roads throughout the Project Site.

More information on the existing roadway network is available in the Project's Traffic Impact Analysis report, which is provided as Appendix L (LLG 2024a).

Existing Trip Generation

The Project Site is vacant. Therefore, the Project does not currently generate any vehicular trips.

Existing Transit Service

Public transit bus service is provided in the vicinity of the Project Site by the Orange County Transportation Agency (OCTA), with the nearest transit stop located to the east of the Project Site at the Anaheim Hills Festival shopping center. Local Fixed Route 38 provides service from Lakewood to Anaheim near the Project Site. The route traverses the cities of Lakewood, Cerritos, La Palma, Buena Park, Yorba Linda, and Anaheim. During the weekday AM and PM peak hours, Route 38 has approximate headways between 20 and 25 minutes in the eastbound and westbound directions. On the weekends, headways are approximately 45 minutes for AM and PM peak hours.

Bicycle and Pedestrian Facilities

There are currently no sidewalks within the Project Site. Under existing conditions, pedestrians and other users access Deer Canyon Park Preserve through the Project Site via an existing private paved maintenance access road along the western portion of the Project Site.

There are currently no sidewalks along the northern or southern sides of Santa Ana Canyon Road adjacent to the Project Site.

There are existing Class II bike lanes on both sides of Santa Ana Canyon Road near the Project Site.

4.15.2 REGULATORY SETTING

State

As the owner and operator of the State Highway System, the State of California Department of Transportation (Caltrans) implements established State planning priorities in all functional plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact State highway facilities. Pursuant to Section 21092.4 of the Public Resources Code, for projects of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities which could be affected by the Project. The proposed Project would not affect any Caltrans facilities and is not considered a project of Statewide, regional, or area-wide significance.

Senate Bill 743

With the adoption of Senate Bill (SB) 743, the State of California changed the method of transportation analysis required under the California Environmental Quality Act (CEQA) for publicly- and privately-initiated projects. The law changed the way local jurisdictions analyze transportation impacts from development projects and identify mitigation measures to reduce those impacts. The previous practice of evaluating transportation impacts used on-road congestion or level of service (LOS). SB 743 requires the amount of driving and length of trips — as measured by vehicle miles traveled (VMT) — be used to assess transportation impacts on the environment for purposes of evaluating impacts under CEQA. These impacts are reduced or "mitigated" by implementing a range of measures that may include, among others, increasing transit, providing for active transportation such as walking and biking, and participating in mitigation banks. All jurisdictions have the option to tailor such measures to their unique communities within the context of the parameters set forth by CEQA.

Specifically, pursuant to SB 743, on December 28, 2018, the CEQA Guidelines were amended to add Section 15064.3, Determining the Significance of Transportation Impacts, which states that generally, VMT is the most appropriate measure of transportation impacts. In addition to making VMT the preferred metric, as noted above, Section 15064.3(a) also

prohibited the use of delay from being used to determine environmental impacts stating, "Except as provided in subdivision (b)(2) (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact." This prohibition is reinforced by the CEQA Statute, Public Resources Code Section 21099(b)(2), "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, 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 pursuant to this division, except in locations specifically identified in the guidelines, if any." Beginning on July 1, 2020, the provisions of CEQA Guidelines Section 15064.3 and Public Resources Code Section 21099 applied statewide.

Technical Advisory on Evaluating Transportation Impacts in CEQA

The *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory)[1] provides advice and recommendations to CEQA lead agencies on how to implement SB 743. This includes technical recommendations regarding the assessment of VMT, thresholds of significance, VMT mitigation measures, and screening thresholds for certain land use projects. Lead agencies may consider and use these recommendations at their discretion. Key guidance from this document includes the following:

- VMT is the most appropriate metric to evaluate a project's transportation impact.
- OPS recommends tour- and trip-based travel models to estimate VMT but ultimately defers to local agencies to determine the appropriate tools.
- OPR recommends measuring VMT for residential and office projects on a "per rate" basis.
- OPR recommends that a per resident or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. In other words, a residential or office project that generates VMT per resident or employee that it more than 85 percent of the regional VMT average could result in a significant impact. OPR notes that this threshold is supported by evidence that connects this reduction to the State's emission goals.
- OPR recommends that where a project replaces existing VMT-generating land uses, if the replacement would lead to an overall decrease in VMT, the project would lead to a less than significant transportation impact. If the project would lead to a net overall increase in VMT, then the thresholds above should apply.
- Lead agencies have the discretion to set or apply their own significance thresholds.

The Technical Advisory also provides guidance on impacts on transit. Specifically, the Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact. As an example, the Technical Advisory suggests that "an infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and

[1] California Governor's Office of Planning and Research. (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December.

accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network."

On December 18, 2019, California's Third District Court of Appeal published an opinion in *Citizens for Positive Growth and Preservation v. City of Sacramento*, which involved a challenge to the City of Sacramento's adoption of its General Plan based on LOS instead of VMT for transportation impact identification. In reaching its decision in that case, the Court of Appeal applied Public Resource Code Section 21099(b)(2) and stated, "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.'" The Court therefore concluded that the General Plan's policies that included LOS standards could not be used as a threshold to determine whether the project would have a significant environmental impact under CEQA. VMT is used to identify the proposed project's potentially significant transportation impacts for the purposes of this Draft EIR.

Senate Bill 375

Senate Bill (SB) 375 provides guidance regarding reducing emissions from cars and light trucks. There are four major components of SB 375. First, SB 375 requires regional greenhouse gas (GHG) emissions targets. These targets must be updated every eight years in conjunction with the revision schedule of the housing and transportation elements of local general plans. Second, Metropolitan Planning Organizations (MPOs) are required to each create a Sustainable Communities Strategy (SCS) that provides a plan for helping to achieve their respective regional targets. Third, SB 375 requires housing elements and transportation plans to be synchronized on 8-year schedules. Finally, MPOs must use transportation and air emissions modeling techniques that are consistent with the guidelines prepared by the California Transportation Commission. The current SCS for Orange County is the SCAG Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Assembly Bill 1358

Assembly Bill 1358, also known as the California Complete Streets Act of 2008, requires cities and counties to include "Complete Streets" policies in their general plans. These policies address the safe accommodation of all users, including bicyclists, pedestrians, motorists, public transit vehicles and riders, children, the elderly and the disabled. These policies can apply to new streets as well as the redesign of corridors.

Regional

Connect SoCal 2024

On April 4, 2024, SCAG's Regional Council voted to approve and fully adopt Connect SoCal 2024, the 2024-2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (SCAG 2024a). SCAG is one of 18 MPOs in the State of California and is comprised

of the following counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal 2024 is a long-range regional transportation plan that provides a vision for regional transportation investments, integrated with land use strategies, over a 20-year period. Connect SoCal 2024 includes a vision and goals for the region. Key components include a growth forecast and regional development pattern based on population, household, and employment growth projections for the SCAG region through the year 2050 as well as a transportation network including a list of transportation projects and investments. The Plan also identifies Regional Planning Polices and Implementation Strategies that the region could pursue over the Plan horizon. Other components include financial assumptions and expenditures, key transportation investments, and an evaluation of the Plan's performance. As part of Connect SoCal 2024, SCAG developed the Local Data Exchange (LDX) process to form the basis for the regional growth forecast. SCAG developed the LDX process to engage local partners and get information needed to fulfill state planning requirements. This included information on land use, transportation, priority development areas (PDAs), geographical boundaries, resource areas, and growth that was shared and exchanged through a combination of one-on-one meetings and data submissions with local jurisdictions. In consultation with the Technical Working Group (TWG), SCAG developed growth forecast guiding principles to ensure that the regional growth forecast yields a technically robust forecasted regional development pattern which meets its statutory objectives, which are incorporated as part of the SCS.

Local

As described above, while not required by CEQA, some of the policies listed below would support a non-CEQA LOS operational evaluation; therefore, a separate report reflecting this LOS analysis for the proposed project identifying applicable improvements has been prepared by the City's transportation consultant for the City's consideration prior to approval of the Project.

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

This section of the Draft EIR and the Project's VMT Analysis report were prepared consistent with the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis, which was adopted by the City in June 2020. These guidelines describe when a traffic impact analysis is required, and the contents required within a traffic impact analysis. The guidelines include methods and significance criteria for use on projects within the City related to a project's impacts related to VMT, active transportation, and public transit.

City of Anaheim General Plan

Circulation Element

The Circulation Element of the City's General Plan describes the existing circulation system and serves as an infrastructure plan that addresses the mobility of people, goods and services, energy, water, sewage, storm and drainage, and communications. The Element is

purposed towards meeting the current and future needs of Anaheim residents and visitors by creating and improving a circulation system within the City. The City's 'Planned Roadway Network', provided as Figure C-1 of the Circulation Element, provides a visual overview of the City's roadway classifications.

The classifications of the roadways nearest and adjacent to the Project Site boundaries include:

- Weir Canyon Road, Scenic Expressway;
- Santa Ana Canyon Road, Primary Arterial;
- Fairmont Boulevard, Hillside Secondary Arterial;
- Serrano Avenue, Hillside Secondary Arterial;
- Canyon Rim Road, Hillside Secondary Arterial.

As discussed in more detail in Section 4.1, Aesthetics, of this Draft EIR, the Project Site is visible from SR-91, which is designated as a State Scenic Corridor. The Project Site is also within the City's Scenic Corridor Overlay Zone. There are public views of the Project Site from Santa Ana Canyon Road, SR-91, the Santa Ana River Trail, Yorba Regional Park, and Deer Canyon Park Preserve.

More information on Project consistency with policies from the City's Circulation Element is provided in Section 4.10, Land Use and Planning, of this Draft EIR.

Bicycle Master Plan

The Bicycle Master Plan is an appendix to the City's General Plan. The Bicycle Master Plan is the vision for the City's bikeways network. The City's Bicycle Master Plan states that the Anaheim Hills area south of Santa Ana Canyon Road and east of the SR-55 freeway, which includes the Project Site, is a hilly area which can be a hindrance to commuting and recreational cyclists but a welcomed challenge for bicycling enthusiasts. The Bicycle Master Plan identifies "Class II Existing" bicycle lanes on Santa Ana Canyon Road north of the Project Site. The Bicycle Master Plan does not identify any planned bicycle improvements on Santa Ana Canyon Road near the Project Site or within the Project Site itself. More information on Project consistency with bicycle-related policies is provided in Section 4.10, Land Use and Planning, of this Draft EIR.

Know Your Way

"Know Your Way" is a City initiative that provides guidance on primary and secondary evacuation routes in case of wildfire, flood, or earthquake events in the eastern portion of the City. Know Your Way consists of a website that contains maps that cover east Anaheim. The maps designate evacuation zones within east Anaheim as well as primary and secondary evacuation routes for each evacuation zone to use during a typical evacuation event. The maps also designate where APD would typically close or divert traffic; however, APD takes an adaptive approach to evacuations. Therefore, APD may implement different traffic

controls from what is shown in Know Your Way maps during an evacuation event based upon the particular details of that event. Generally, the Know Your Way maps direct motorists to take local arterial streets to get to SR-91, and then to travel west on SR-91.

As part of Know Your Way, students from schools within an evacuation zone would be evacuated to Orange High School during evacuation events to avoid creating additional congestion in east Anaheim that could hinder emergency response and/or evacuation. During future evacuation events, horses and livestock from affected evacuation zones would be temporarily evacuated to the Orange County Fairgrounds or to other stables in the County.

The Project Site is within Know Your Way Evacuation Zone 8, which is also referred to as the "Sycamore" zone.

4.15.3 THRESHOLDS OF SIGNIFICANCE

In accordance with the City of Anaheim's Environmental Checklist, a project would result in significant impacts related to transportation if it would:

Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

a) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
b) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
c) Result in inadequate emergency access.

4.15.4 IMPACT ANALYSIS

a) Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The Project's consistency with programs, plans, ordinances, and policies related to the circulation system, including transit, roadway, bicycle and pedestrian facilities, is evaluated below.

As described more fully in Section 3.0, Project Description, and the Hills Preserve Specific Plan (Specific Plan), the Project would increase vehicular, pedestrian, bicycle and equestrian connectivity throughout the Project Site as well as Project vicinity (e.g., existing Festival Shopping Center commercial area) via installation of trail segments as well as improvements to the existing street network, both on- and off-site.

The locations and alignments of the Project's internal roads and driveways are depicted in the proposed Tentative Tract Map, and are also depicted on Exhibit 3-1. The Project would include a number of street network/intersection improvements to facilitate the Project's

traffic flow. For example, as part of the Project, the median on Santa Ana Canyon Road would be modified to allow left-turn in and out of Project Driveway No. 1. A traffic signal would be installed at Deer Canyon Road and Santa Ana Canyon Road, creating a new signalized intersection. The proposed intersection would also align with the existing driveway of the self-storage business that is located north of the Project Site to the north of Santa Ana Canyon Road, creating a four-way, signalized intersection. The Project would construct a new eastbound deceleration lane on Santa Ana Canyon Road at Deer Canyon Road, subject to obtaining any necessary associated property interests to accommodate the relocated northern section of Deer Canyon Road.

The Project would also construct a new multi-use trail along Santa Ana Canyon Road between the two new proposed intersections. The Project proponent would offer for dedication a public access easement for the multi-use trails, which would ultimately connect to the City's Deer Canyon Park Preserve and would also include signage and entrance improvements for the Preserve at Santa Ana Canyon Road.

"C" Street would be built as a two-lane road with curb and gutter on each side of the road and a sidewalk on the east side of the road. The Project's paving of Deer Canyon Road would occur from the Project entrance to approximately 50-feet beyond the proposed intersection with "C" Street and would enhance access to Deer Canyon Park Preserve up to the southern boundary of the Project, but not the entirety of the existing private road. At this location, the Project's proposed multi-use trail on the south side of Deer Canyon Road would tie into the existing trail.

Alternatively, vehicles entering the Project Site from the proposed intersection of Santa Ana Canyon Road and Deer Canyon Road would have the option to make an immediate left-turn onto the proposed "A" Street, which would provide access to the north, east, and south sides of the proposed multiple-family residential uses, including "B" Street. "A" Street would also provide access to the proposed commercial uses to the east within the Project Site. "A" Street would be built as a two-lane roadway with curb and gutter, a ten-foot-wide landscaped area on the north side of the road, and a sidewalk on the south side of the road. "B" Street would be built as a two-lane roadway with curb and gutter, a sidewalk on the west side of the road, and a graded slope to the east side of the road.

The Project's on-site circulation layout has been designed to provide adequate access for all anticipated users, as detailed in its Transportation Impact Analysis, which is provided as Appendix L.

City of Anaheim

General Plan – Circulation Element:

The Project's consistency with applicable goals and policies from the City's Circulation Element is provided in Table 4.10-3 in Section 4.10, Land Use and Planning.

The Project would partially conflict with Goal 2.1 of the City's Circulation Element, which is: "(To) maintain efficient traffic operations on City streets and maintain a peak hour level of

service not worse than D at street intersections." Through the addition of trip generating land uses, the Project would result in some minor increases in congestion at nearby intersections in exceedance of this target. However, pursuant to SB 743, LOS is no longer considered an environmental impact pursuant to CEQA.

The Project would partially conflict with Goal 2.2, Policy 5 of the City's Circulation Element, which is: "(To) minimize disruptions to traffic and pedestrian/bicycle flow." Through the addition of trip generating land uses, the Project would result in some minor increases in congestion at nearby intersections in exceedance of this target.

Otherwise, the Project's improvements would comply with other goals and policies relating to the Project that are contained in the City's Circulation Element. A full evaluation of the Project's consistency with policies from the City's Circulation Element is provided in Section 4.10, Land Use and Planning.

Given that the two aspects of the City's Circulation Element that the Project conflicts with both relate to vehicular level of service and congestion that would result from the Project, and in accordance with Public Resources Code Section 21099, these partial conflicts with aspects of the City's Circulation Element would not constitute environmental effects pursuant to CEQA.

Bicycle Master Plan

The Project would not conflict with any applicable provisions of the City's Bicycle Master Plan. Consistent with what is shown in the Bicycle Master Plan, the Project would replace/realign the existing Class II bicycle lane that exists along the south side of Santa Ana Canyon Road. The Project would protect or replace wayfinding signage along the Project Site's frontage with Santa Ana Canyon Road.

With implementation of these project design features, the Project would not result in any inconsistencies with any bicycle-related plans, policies, programs, or ordinances.

Pedestrian Facilities

The Project would increase pedestrian connectivity throughout the Project Site as well as Project vicinity (e.g., existing Festival Shopping Center commercial area and Deer Canyon Park Preserve) via installation of trail segments as well as improvements to the existing street network, both on- and off-site.

For example, within the Project Site, the Project would provide pedestrian paths of travel between parking areas and amongst buildings.

The Project would provide improved pedestrian access off-site as well. For instance, it would facilitate enhanced connectivity to the existing transit stop and various land uses within the Anaheim Hills Festival shopping center, which is east of the Project Site. In addition, the Project would facilitate improved access to other nearby open space areas as well as the City's Deer Canyon Park Preserve.

With implementation of the Project's design features, the Project would not result in conflict with any pedestrian-related plans, policies, programs, or ordinances.

Conclusion

The Project would result in a less than significant impact related to this threshold and no mitigation is required.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Significant Unavoidable Impact. A Vehicle Miles Traveled Analysis report (VMT Analysis report) was prepared for the Project, which provides an evaluation of Project's potential environmental impacts pursuant to State CEQA Guidelines Section 15064.3, subdivision (b), which addresses the required approach to determining the significance of transportation impacts pursuant to CEQA (LLG 2024b). As stated therein and explained further above, generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts.

The term VMT refers to the amount and distance of automobile travel that is attributable to a project.

As required by the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis, a complete VMT analysis and forecasting using the OCTAM model was conducted for the Project to determine if they have a significant VMT impact.

The Project's VMT analysis included both "Project-generated VMT" and "Project's effect on VMT" for baseline conditions, baseline plus Project conditions, cumulative no Project conditions, and cumulative plus Project conditions.

CEQA VMT Impact Thresholds

The City's VMT significance criteria as stated in the City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis (June 2020) are detailed below:

1. A project would result in a significant project-generated VMT impact if the baseline project-generated or cumulative project-generated VMT per service population exceeds 15% below the County of Orange baseline VMT per service population.
2. The project's effect on VMT would be considered significant if the baseline or cumulative link-level boundary Citywide VMT per service population increases under the plus project condition compared to the no project condition.

The City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis further states:

- "Please note that the cumulative no project shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence.

Given that the Project would require a zone change, the Project would not be consistent with the SCAG RTP/SCS and a cumulative analysis for the Project was conducted in the VMT Analysis report.

Baseline VMT Per Service Population:

The baseline VMT for the County and for the transportation analysis zone (TAZ) containing the Project Site are provided in Table 4.15-1.

TABLE 4.15-1
BASELINE PROJECT-GENERATED VMT PER SERVICE POPULATION

Baseline County of Orange VMT	147,289,102.45
Baseline County of Orange Service Population	5,726,964
Baseline County of Orange VMT/Service Population	25.72
Baseline County of Orange VMT/Service Population (Threshold)	21.86 (25.72 x 85%)
Baseline Project TAZ VMT	137,880.90
Baseline Project TAZ Service Population	4,966
Baseline Project-Generated VMT/Service Population	27.76
Compared to the City Threshold	21.25% Reduction Needed
Source: LLG 2024b. VMT: Vehicle Miles Traveled; TAZ: Transportation Analysis Zone.	

Cumulative VMT Per Service Population:

The baseline VMT for the County and for the TAZ containing the Project Site are provided in Table 4.15-2.

TABLE 4.15-2
BASELINE PROJECT-GENERATED VMT PER SERVICE POPULATION

Baseline County of Orange VMT	147,289,102.45
Baseline County of Orange Service Population	5,726,964
Baseline County of Orange VMT/Service Population	25.72
Baseline County of Orange VMT/Service Population (Threshold)	21.86 (25.72 x 85%)
Cumulative Project TAZ VMT	143,277.43
Cumulative Project TAZ Service Population	4,952
Cumulative Project-Generated VMT/Service Population	28.93

Compared to the City Threshold	24.44% Reduction Needed
Source: LLG 2024b. VMT: Vehicle Miles Traveled; TAZ: Transportation Analysis Zone.	

Project-Generated VMT Impacts:

Based on the application of the City's VMT significance criteria, the Project would have a significant Project-generated VMT impact for both the Baseline and Cumulative scenarios (i.e., baseline and/or cumulative Project-generated VMT exceeds the City's threshold), as outlined below:

- **Baseline Project-Generated VMT** – The Baseline Project-generated VMT would need to be reduced by 21.25% to meet the City's VMT significance threshold, based on the following calculations and as further detailed below in Table 4.15-3.
    - Baseline Project-Generated VMT/Service Population (SP) = 27.76 (see Table 4.15-1)
    - City's VMT Significance Threshold = 21.86 (see Table 4.15-1)
    - (27.76 – 21.86) / 27.76 = 21.25% VMT Reduction Needed (to mitigate Baseline Project-generated VMT significant impact)

TABLE 4.15-3
BASELINE PROJECT'S EFFECT ON VMT

Baseline No Project link-level 10-mile boundary VMT	28,445,480
Baseline No Project Service Population	2,250,745
Baseline No Project link-level 10-mile boundary VMT/Service Population (Threshold)	12.64
Baseline Plus Project link-level 10-mile boundary VMT	28,478,025
Baseline Plus Project Service Population	2,252,706
Baseline Plus Project link-level 10-mile boundary VMT/Service Population	12.64
Compared to the Threshold	0% (No Change)
Source: LLG 2024b. VMT: Vehicle Miles Traveled.	

- **Cumulative Project-Generated VMT** – The Cumulative Project-generated VMT would need to be reduced by 24.44% to meet the City's VMT significance threshold, based on the following and as further detailed below in Table 4.15-4:
    - Cumulative Project-Generated VMT/SP = 28.93 (see Table 4.15-2)
    - City's VMT Significance Threshold = 21.86 (see Table 4.15-2)
    - (28.93 – 21.86) / 28.93 = 24.44% VMT Reduction Needed (to mitigate Cumulative Project-generated VMT significant impact)

TABLE 4.15-4
CUMULATIVE PROJECT'S EFFECT ON VMT

Cumulative No Project link-level 10-mile boundary VMT	33,496,895
Cumulative No Project Service Population	2,610,691
Cumulative No Project link-level 10-mile boundary VMT/Service Population (Threshold)	12.83
Cumulative Plus Project link-level 10-mile boundary VMT	33,508,121
Cumulative Plus Project Service Population	2,612,667
Cumulative Plus Project link-level 10-mile boundary VMT/Service Population	12.83
Compared to the Threshold	0% (No Change)
Source: LLG 2024b. VMT: Vehicle Miles Traveled.	

Project Effects on VMT:

Given that the Project Site is located on the eastern edge of the City of Anaheim limits and based on direction provided by the City, a 10-mile radius from the proposed Project was used to calculate the Project's Effect on VMT. Using the application of the VMT significance criteria described in this section, the Project would not result in substantial effects on VMT for either the Baseline or Cumulative scenarios. Specifically, the baseline and/or cumulative link-level 10-mile boundary VMT per Service Population would result in no change under the plus project condition when compared to the no project condition. More information on these calculations is provided below:

- **Baseline Project's Effect on VMT** – As shown below, the Baseline plus Project link-level 10-mile boundary VMT per Service Population results in no change, and is equal to the Baseline no Project link-level 10-mile boundary VMT per Service Population threshold:
    - Baseline Plus Project link-level 10-mile VMT/SP = 12.64
    - Baseline No Project link-level 10-mile VMT/SP = 12.64
    - (12.64 – 12.64) / 12.64 = 0.00% (No Change)

As shown above in Table 4.15-3, the Baseline Project-generated VMT would need to be reduced by 21.25% to meet the City's VMT significance threshold. The 0.00% cumulative Project effect on VMT would not achieve the 21.25% reduction needed. Therefore, the Project would result in a significant impact related to baseline VMT prior to mitigation.

Cumulative Project's Effect on VMT – As shown below, the Cumulative plus Project link-level 10-mile boundary VMT per Service Population results in no change, and is equal to the Cumulative no Project link-level 10-mile boundary VMT per Service Population threshold:

- Cumulative Plus Project link-level 10-mile VMT/SP = 12.83
- Cumulative No Project link-level 10-mile VMT/SP = 12.83
- (12.83 – 12.83) / 12.83 = 0.00% (No Change)

As shown above in Table 4.15-4, the Cumulative Project-generated VMT would need to be reduced by 24.44% to meet the City's VMT significance threshold. The 0.00% cumulative Project effect on VMT would not achieve the 24.44% reduction needed. Therefore, the Project would result in a significant impact related to cumulative VMT prior to mitigation.

VMT Mitigation Measures:

Since a significant VMT impact has been identified, mitigation measures to reduce the Project's VMT impact must be identified to reduce the VMT levels to a level at or below the City's thresholds to the extent feasible.

Mitigation measures were evaluated that would potentially reduce the number of vehicle trips and/or that would reduce the length of vehicle trips.

The following mitigation measures have been developed to reduce the Project's VMT impacts to the extent feasible, which consist of the following:

- **MM TRANS-1**: Implement Commute Trip Reduction Marketing
- **MM TRANS-2**: Provide Information Regarding Ridesharing Program
- **MM TRANS-3**: Provide End-of-Trip Bicycle Facilities
- **MM TRANS-4**: Provide Pedestrian Network Improvements
- **MM TRANS-5**: Provide Information Regarding Telecommute and/or Alternative Work Schedule Program; Support Telecommuting for Project Residents

The full text of these mitigation measures is provided below in Section 4.15.6.

Other potential VMT mitigation measures were explored by the City and the Property Owner/Developer that were ruled out for being infeasible. Considerations included, among others, the nature of the proposed uses and the lack of ongoing control the Property Owner/Developer has with respect to implementation. For example, the City explored the opportunity to add a transit shelter with shade on Roosevelt Road; however, the City has learned that OCTA is planning to eliminate OCTA Route 38 between Imperial Highway and Roosevelt Road, effectively cutting bus service to this location in the near future.

Also, unbundled parking was evaluated; however, it would be inconsistent with AMC Section 18.42.030.0203, which addresses residential parking requirements.

According to research conducted by Caltrans and others, the inclusion of affordable housing in new developments can reduce the amount of VMT when compared to a fully market rate housing (Caltrans 2018a, The California Housing Partnership 2015a). Key reasons for this difference in VMT are that individuals living in affordable multifamily housing have lower rates of car ownership and higher rates of transit use and use of bicycling and walking as modes of travel. To reduce the VMT that would result from the Project, the inclusion of affordable housing units into the proposed multiple-family residential portion of the Project Site. However, the Property Owner/Developer determined that affordable housing would not be economically feasible given the substantial costs to acquire and develop the Project Site.

The City considered requiring the Property Owner/Developer to provide a sidewalk on the south side of Santa Ana Canyon Road between Eucalyptus Drive and El Rancho Charter School to allow for improved pedestrian connectivity from the Project Site to the local middle school and to local amenities. However, the City is already working on a roadway improvement project along Santa Ana Canyon Road from west of Lakeview Avenue to east of Weir Canyon Road that will provide sidewalks at this location (i.e., from Eucalyptus Drive to El Rancho Charter School) as part of a separate City initiative. Therefore, this was not incorporated as a mitigation measure.

Also, to reduce the Project's VMT the City considered including a mitigation measure that would reduce the number of parking spaces available on the Project Site by 25 percent. The idea being that a smaller supply of parking would potentially lead individuals living and working at the Project Site to have fewer cars and to carpool, bicycle, walk, and use transit more. However, due to the potential for spillover parking and due to inconsistency with AMC requirements, this measure was ruled out. Also, this measure was ruled out due to the lack of transit near the Project Site, which makes it unlikely in existing conditions that residents and employees would be able to commute by non-vehicular modes to the Project Site.

Finally, the City considered several other measures that would obligate implementation of specified TDM strategies but ultimately determined these could not be feasibly implemented given the nature of the proposed uses and the ultimate lack of control the Property Owner/Developer would have with respect to future implementation. Such TDM measures are typically intended for, and work most effectively in the context of, for example, large employment-generating uses where one employer has the ability to manage and implement measures over time with respect to a large workforce that is commuting from specified locations to one office site. For example, instituting an ongoing shuttle/van service for employees with jobs at the Project's multi-family residential component could not be efficiently implemented given the relatively few number of total on-site employees that the Project's multi-family component is expected to generate. Also, since the Property Owner/Developer would not have the ability to ultimately control whether and/or how various commercial tenants located within the Project or employers of Project residents allow for telecommuting and/or alternative work schedules, this type of measure was determined infeasible.

In summary, the focus of the recommended mitigation measures is to encourage the use of alternative modes of transportation through (1) the installation of multi-use trail facilities

and sidewalks to facilitate connectivity, (2) on-site information provision and assistance with coordination of carpooling, public transit and similar efforts, and (3) economic incentives for those Project users who elect to take advantage of available opportunities for alternative modes. Such focus helps to ensure successful and consistent implementation of these measures, while taking into appropriate account the realistic constraints of TDM strategies given the nature of the proposed uses, etc.

Based on the combined implementation of the recommended VMT mitigation measures described above and detailed below, the Project's VMT impact could be offset by up to 7.51%, which is less than the 21.25% and the 24.44% reductions required to fully offset the Project's VMT impact for baseline and cumulative conditions, respectively. A full accounting of the calculations that have been prepared related to the effectiveness of each of the VMT measures is provided in the VMT analysis provided as Appendix T of this Draft EIR.

Therefore, even with implementation of **MM TRANS-1** through **MM TRANS-5**, the Project would result in a significant impact related to this threshold.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact.

As required under CEQA, the focus of this analysis was whether the Project would introduce geometric design feature(s) or incompatible uses such that it would substantially increase hazards with respect to the transportation network.

See Section 3.0, Project Description, of this Draft EIR and the Specific Plan for a detailed description of the Project's proposed circulation plan, which are summarized in Section 3.10.3 of this Draft EIR.

As part of the Project's Traffic Impact Analysis report, five years of collision history was reviewed via the Statewide Integrated Traffic Records System (SWITRS) for the section of Santa Ana Canyon Road along the Project frontage. Data was reviewed for 2017 through 2023 (LLG 2024a). Review of this data shows that during this 5-year period, a single crash between a motorist and a fixed object occurred due to unsafe speed, which indicates no existing safety condition within proximity of the Project Site. As such, there is no existing safety condition that the proposed Project could in any way exacerbate.

The Project's proposed transportation improvements are summarized in Section 3.10.3, Circulation, of this Draft EIR. All Project circulation improvements have been designed and would be required to be constructed to comply with applicable City standards. These intersections and roadways have been reviewed and preliminarily approved by the City and by Anaheim Fire and Rescue staff, with ultimate review and approval to occur at the final design/site plan review stage.

The Project's Transportation Impact Analysis included a sight distance evaluation for the two proposed Project driveways off of Santa Ana Canyon Road, which determined that both

of these driveways would maintain a substantially clear line of sight between the intersection and drivers along Santa Ana Canyon Road (LLG 2024a). The sight distance evaluation also found that there was adequate vertical sight distance so that drivers would be able to see the upcoming traffic signal with ample time to be able to react.

Therefore, based on the foregoing, the Project would not result in design hazards due to geometric design features such as sharp curves or dangerous intersections.

The Project would consist of residential, commercial, and open space land uses that would not result in abnormal equipment (such as, e.g., slow-moving farm equipment) entering or leaving the Project Site that could present a significant transportation safety hazard.

In addition, the Project would include a sidewalk connection along Santa Ana Canyon Road and other connectivity improvements that would substantially increase pedestrian and bicycle safety.

Therefore, the Project would result in a less than significant impact related to this threshold and no mitigation is required.

d) Would the Project result in inadequate emergency access?

Less than Significant With Mitigation Incorporated. The Project would incorporate primary and second access routes pursuant to applicable requirements. For example, the Project's entry driveway and internal circulation system have been designed and would be required to be constructed to comply with all applicable design and safety standards required by adopted fire codes, safety codes, and building codes.

As described in more detail in Section 4.8, Hazards and Hazardous Materials, in response to threshold (g), access roads to the Project Site would be required to be designed, built and maintained to comply with all applicable Anaheim Fire and Rescue requirements for road widths, vertical clearances, and connectivity. Also, the Project's roads have been designed and would be required to be constructed to allow for sufficient turning radii and slope grade requirements to enable adequate access for fire apparatus and other emergency vehicles. All internal roads have been designed and would be required to be constructed to be all-weather roads with a maximum grade of 10% that are capable of supporting an imposed load of 78,000 pounds in accordance with applicable requirements. Also, any roads that have traffic lights would be required to have approved traffic pre-emption devices (Opticom) compatible with devices on the Fire Apparatus to enable efficient ingress and egress during an emergency. The edges of fire access routes would be fuel modified pursuant to applicable requirements to ensure these areas remain accessible during an emergency event. No parking would be allowed along any of the internal fire access roads in the Project Site. Signage would be required to be installed and vehicles would be towed to ensure adequate access is maintained. The Project Developer/Owner would be required to establish an appropriate funding mechanism to ensure its long term funding and maintenance of internal private roads. The location of the Project Site combined with these Project design features would ensure adequate emergency access to and from the Project Site.

Through the provision of a new traffic signal, improved driveways, and new internal roads within the Project Site, the Project would improve emergency access within the Project Site. Furthermore, the Project would modify the median on Santa Ana Canyon Road to allow for left-turn in and out of Project Driveway No. 1 at Deer Canyon Road and Santa Ana Canyon Road, further enhancing access.

During construction of the Project, there would be a temporary increase in traffic on local roads related to construction employees, material deliveries, and haul trucks when compared to existing conditions. Also, during Project construction, as is typical, there would be limited instances where there would be temporary closures of up to one lane in each direction on Santa Ana Canyon Road. These temporary lane closures would be needed to allow for roadway and utility improvements that are required to accommodate the Project. These typical temporary closures and additional construction traffic could potentially impair implementation of Know Your Way if an evacuation event were to occur during construction. Therefore, as required by **MM HAZ-4**, the Project would be required to minimize, to the extent feasible, potential effects to local circulation and to emergency response times and to evacuation through the preparation and implementation of a Construction Management Plan (approved and enforced by the City) that would specify the methods by which traffic would be maintained and managed along Santa Ana Canyon Road and other local roads throughout the Project's construction process.

As discussed in more detail in Section 4.18, Wildfire, during operation of the Project, due to the additional vehicles that would need to evacuate the Project Site in the event of an emergency, when compared to conditions without the Project, the Project would result in it taking an average of approximately 24 additional minutes for vehicles to evacuate from the Project Site and from nearby neighborhoods during an evacuation event. Rather than under existing conditions without the Project, where it would take approximately 186 minutes to fully evacuate the Project Site and other nearby properties, with the Project, it would take an additional approximately 24 minutes (for a total of approximately 210 minutes) (LLG 2024c). This increased delay would constitute a significant impact pursuant to this threshold if it were to impair emergency access. However, as detailed further in Section 4.18, Wildfire, the delay would not substantially impair emergency access given that, based on reasonable assumptions as detailed in the evacuation modeling, half of Santa Ana Canyon Road would always be open thereby facilitating emergency evacuation efforts. On a related note, as discussed further in Section 4.18, Wildfire, of this Draft EIR, the Project would enhance wildfire resilience for the Project Site as well as the existing nearby neighborhoods. By enhancing the existing street network and providing fuel modification relating to vegetation, and non-combustible construction areas, this should help to prevent wildfire spread to neighboring communities, and thus potentially decrease needs associated with emergency evacuation in the first instance.

Also, during operation of the Project, the Project would result in minor additional vehicular congestion on local streets that would result in lower vehicular levels of service than would occur without the Project. However, as described in the Project's Traffic Impact Analysis, the Project, particularly with its numerous design features that are intended to facilitate traffic flow, is forecast to only add five to six vehicles per minute to the roadways near the Project Site during peak conditions, which would not measurably worsen traffic congestion in the

area as compared to existing conditions given the significant amount of traffic capacity at many of the study intersections.

Therefore, with implementation of **MM HAZ-4** and **MM HAZ-5**, the Project would result in a less than significant impact related to this threshold.

4.15.5 CUMULATIVE IMPACTS

The geographic context for this analysis includes the transportation study area as identified herein, and the rest of the City of Anaheim. Projects considered in the cumulative impact analysis consist of relevant past, present and reasonably foreseeable future projects, including those eight projects that are described in more detail in Table 4-1, Cumulative Projects List (see Section 4.0). This analysis evaluates whether the impacts of the Project, together with the impacts of other cumulative development, could result in a cumulatively significant impact with respect to transportation. This analysis then considers whether incremental contribution of impacts associated with the implementation of the Project would be cumulatively considerable and thus significant. Both conditions must apply for the Project's cumulative effects to rise to the level of significance.

Collectively, the cumulative projects and the proposed Project would result in increased development that would collectively increase demand for local roads (and thus increased congestion generally), as well as transit and use of pedestrian and bicycle facilities, and would result in increased VMT.

The Project, as well as each cumulative project, would be reviewed for consistency with applicable plans, policies, and ordinances relating to the transportation system, including the City's General Plan Circulation Element and the City's Bicycle Master Plan, and would be required to be consistent therewith, including the incorporation of any necessary improvement and/or mitigation measures to address same as they relate to transit, roadway, bicycle and pedestrian facilities. In so doing, this would result in a less than significant cumulative impact. Furthermore, with respect to the Project's contribution to this already less than significant impact, it would not be cumulatively considerable given the nature of the proposed uses and the incorporation of a number of project design features, including those that would facilitate bicycle and pedestrian connectivity.

With respect to VMT, the Project would result in a significant unavoidable impact related to VMT. Other cumulative projects would also result in increased VMT when compared to existing uses as most of these cumulative projects would result in a greater density and intensity of development with a greater level of activity and users as compared to existing conditions. The Project, as well as each cumulative project, would be required to mitigate for their VMT impacts through the implementation of TDM measures to the extent feasible; however, overall the Project and the other cumulative projects would collectively result in VMT that is greater than what was assumed in SCAG's RTP/SCS. As such, the Project, combined with other cumulative projects, would result in a significant cumulative impact in this regard (LLG 2024b).

In terms of the Project's contribution to this significant impact, the Project would be required to incorporate numerous TDM measures that reduce its VMT impact to the extent feasible. However, because it is not feasible to reduce Project-generated VMT below 15% of the County baseline, its contribution would be cumulatively considerable.

The Project, combined with other cumulative projects, would each be appropriately evaluated and considered during the development review process in terms of any geometric design features or incompatible uses that could result in a substantial increase in this regard. To the extent any significant impacts would occur, these would need to be appropriately addressed through modifications to design features or the incorporation of feasible mitigation measures. In addition, the Project, as well as other cumulative development, would be required to adhere to all applicable standards and requirements, which would help further reduce the risk of hazard in this regard. For example, the Project and all other cumulative projects' circulation improvements would be required to be constructed to comply with applicable City standards, such as sight distance, vertical clearance, horizontal clearance, weight loading requirements, grade requirements, etc. Therefore, the Project, combined with other cumulative projects, would not result in design hazards due to geometric design features such as sharp curves or dangerous intersections or incompatible land uses that could present a significant transportation safety hazard, and thus cumulative impacts in this regard would be less than significant. With respect to the Project's contribution to this already less than significant cumulative impact, it would not be cumulatively considerable for the reasons set forth above.

4.15.6 MITIGATION PROGRAM

MM TRANS-1 **Implement Commute Trip Reduction Marketing.** This measure consists of the implementation of a marketing strategy to promote the Project's Commute Trip Reduction (CTR) program that would be available to all employees within the commercial component (through provision of same to the relevant tenants) and multiple-family residential component of the Project. This measure is not applicable to contractors. The intention of this measure is that additional information sharing and marketing as required by this measure shall promote and educate employees about their travel choices to the employment location beyond driving, such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions. 100% of employees (i.e., employees who are employed by tenants housed in the commercial component as well as those who are employed by the Property Owner/Developer to serve the multiple-family component) shall be eligible to participate in the CTR program. Prior to issuance of a certificate of occupancy for the multi-family component or the commercial component of the Project, as applicable, the Property Owner/Developer shall document the provision of designated priority parking to the employees of the commercial or multi-family component, as applicable, in the amount required pursuant to applicable requirements for those employees who carpool and also for those that travel to work using electric vehicles and/or zero emission vehicles. As part of the CTR program, the

Property Owner/Developer shall provide a minimum $50 monthly stipend to each participating employee that bicycles or walks to work an average of three or more days per week each month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the marketing measures that had been implemented in the prior year.

MM TRANS-2 **Provide Information Regarding Ridesharing Opportunities.** Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT and GHG emissions. Prior to issuance of an occupancy permit for the commercial component or the multiple-family residential component in the Project, the Property Owner/Developer shall develop and implement a ridesharing information program for participating employees within the Project Site as part of the CTR program discussed above in **MM TRANS-1**. As part of this measure and implementation of the CTR Program, the Property Owner/Developer shall establish, support, maintain, and fund a transportation demand management (TDM) coordinator, whose role would be to provide information regarding ridesharing opportunities to all employees in the Project Site. The CTR program shall provide information regarding ride-matching opportunities to facilitate committed vanpool groups for employees traveling similar routes at similar times. The CTR program shall also include a minimum $100 monthly stipend per person to each participating employee that carpools to work at least three days per week per month. By February 1 of each year, the Property Owner/Developer shall submit a memorandum to the City describing the measures taken pursuant to this measure to promote ridesharing that had been implemented in the prior year.

MM TRANS-3 **Provide End-of-Trip Bicycle Facilities.** This measure includes the installation and maintenance of end-of-trip facilities for employees of the multiple-family residential and commercial buildings in the Project Site. End-of-trip facilities shall include bike parking, bike lockers, showers, and personal lockers, which will be provided by the Property Owner/Developer. In addition to the provision of showers and/or personal lockers that may be required to be incorporated into the Project pursuant to applicable laws and regulations, the Property Owner/Developer shall provide a total of: (a) 52 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bike stalls for the multiple-family component, and (b) 20 long-term bicycle parking spaces via secure bike lockers and/or storage rooms and two short-term bicycle parking stalls for the commercial component. The facilities discussed in this measure shall be depicted on the relevant Project plans to be reviewed and approved by the City, and the facilities shall be installed prior to issuance of the relevant occupancy permit.

MM TRANS-4 **Provide Pedestrian Network Improvements.** As part of this measure and to ensure implementation of the relevant design features, prior to issuance

of a certificate of occupancy for the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,850 linear feet of a multi-use (pedestrian, bicycle and equestrian) trail along the south side of Santa Ana Canyon Road that would extend from the northwestern limits of the Project Site (approximately 385 feet east of Eucalyptus Avenue) to an existing sidewalk that ends approximately 385 feet west of Festival Drive. Also, prior to issuance of a certificate of occupancy for the commercial and/or multiple-family residential components (whichever comes first), the Property Owner/Developer shall construct approximately 2,950 linear feet of new sidewalk along the north side of Santa Ana Canyon Road from Eucalyptus Avenue to approximately 760 feet west of Festival Drive, if feasible. The Property Owner/Developer shall include a pedestrian crossing at the intersection of Deer Canyon Road and Santa Ana Canyon Road. During final design and prior to issuance of a grading permit as part of the City's Right-of-Way Construction Application Permit, the Property Owner/Developer shall provide the City with updated roadway improvement plans for review and approval that depict the sidewalk improvements described in this measure.

MM TRANS-5 **Provide Information Regarding Telecommute and/or Alternative Work Schedule Opportunities; Support Telecommuting for Project Residents**. Prior to issuance of an occupancy permit for the commercial components in the Project, the TDM coordinator shall provide, as part of the Project's CTR program discussed above under MM TRANS-1, to all tenants of the commercial component available information regarding ways in which employers may consider telecommuting and alternative work schedule opportunities. In addition, the Property Owner/Developer shall provide all Project residents of the multiple-family residential component access to on-site "work-from-home" communal spaces, and shall also consider reasonable opportunities for employees of the multiple-family residential component, taking into due account job responsibilities, to telecommute to work at least one day per work week, and/or to have an alternative work schedule such as a 9/80 or 10/40 schedule to allow for fewer overall trips to the office.

4.15.7 SIGNIFICANCE AFTER MITIGATION

Even with implementation of **MM TRANS-1** through **MM TRANS-5, MM HAZ-4**, **MM HAZ-5**, and **MM HAZ-9** the Project would result in a significant unavoidable impact related to transportation with respect specifically to VMT. The Project would have less than significant impacts related to the other transportation thresholds.