



## FINAL MEMORANDUM

Date: May 11, 2020  
To: Alexa Washburn, National Community Renaissance  
From: Paul Herrmann, P.E.  
Jessica Johnson  
**Subject: Mountain View Affordable Housing Community Transportation Assessment**

*OC19-0668*

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This memorandum documents a transportation assessment conducted by Fehr & Peers for the proposed Mountain View Affordable Housing Community project (Project) located at 24551 Raymond Way in Lake Forest, California.

In the first part of this assessment, Fehr & Peers provides a review of proposed trip generation of the Project. The second part of this assessment reviews Vehicle Miles Traveled (VMT) in compliance with Senate Bill 743 (SB 743). This VMT analysis is consistent with requirements of the Office of Planning and Research's (OPR's) technical advisory.

The results of the assessment conclude that the proposed Project is anticipated to generate fewer total trips than the existing land use and would result in a less-than-significant transportation impact. The Project is also presumed to result in a less-than-significant transportation impact related to VMT as it is a 100% affordable housing project.

### PROJECT DESCRIPTION

The Project proposes the development of a 71-unit affordable housing apartment building, with 12 of the 71 units (approximately 15%) being developed as Permanent Supportive Housing (PSH) units (PSH units serve people who are homeless or at risk of homelessness). The project will replace an existing approximately 31,000 square feet (SF) office building on 1.96 acres. The Project is located within a quarter mile of the Orange County Transportation Authority bus route 89 (El Toro-Raymond) transit stop on El Toro Road.



## PROJECT TRIP GENERATION

Trip generation rates from *Trip Generation, 10<sup>th</sup> Edition* (Institute of Transportation Engineers [ITE], 2017) and affordable housing rates from the *Transportation Assessment Guidelines* (Los Angeles Department of Transportation [LADOT], 2019) were used to estimate the number of trips associated with the Project. ITE trip generation rates for General Office (ITE Code 710) were used for the existing office building(s). Since ITE does not distinguish trip generation rates for market-rate housing and affordable housing, trip generation rates from the LADOT *Transportation Assessment Guidelines* were used to estimate the number of trips associated with the affordable housing and PSH units.

Affordable housing trip generation rates differ from market-rate housing rates due to the potential limited access to private vehicles and higher use of public transit of affordable housing residents. The affordable housing and PSH trip generation rates are based on vehicle trip count data collected in Los Angeles in 2016. LA’s Transportation Assessment Guidelines identify different trip generation rates according to type of housing and proximity to high quality transit. High quality transit is transit with 15-minute headways or less. The Project is located within a quarter mile of a transit stop with 30-minute headways. As the Project is not located within a half mile of a transit priority area (TPA) with high quality transit, rates for outside of a TPA were used. **Appendix A** includes the LADOT trip generation rates for affordable housing projects. The trip generation rates used are presented in **Table 1** below:

**Table 1: Trip Generation Rates**

Land Use	ITE Code	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Affordable Housing (Family) - (Outside of TPA) <sup>2,3</sup>	-	4.15	40%	60%	0.55	55%	45%	0.43
Permanent Supportive Housing - (Outside of TPA) <sup>2,3</sup>	-	1.50	71%	29%	0.09	49%	51%	0.16
General Office <sup>1</sup>	710	9.74	86%	14%	1.16	16%	84%	1.15

Source: 1. *Trip Generation, 10<sup>th</sup> Edition* (Institute of Transportation Engineers [ITE], 2017)  
 2. *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines* (LADOT, 2019)  
 3. TPA refers to transit priority area

As presented in **Table 2**, the Project is expected to generate approximately 263 daily trips, including approximately 33 trips (14 inbound/19 outbound) during the AM peak hour, and approximately 27 trips (15 inbound/12 outbound) during the PM peak hour. To estimate a conservative scenario, no additional transit credits were applied to the trip generation estimates. Compared to the existing



office, the Project would generate approximately 39 less daily trips, including approximately 3 less trips during the AM peak hour and approximately 9 less trips during the PM peak hour.

**Table 2: Project Trip Generation Estimate**

Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Project								
Affordable Housing (Family) <sup>2</sup>	59 DU	245	13	19	32	14	11	25
Permanent Supportive Housing <sup>2</sup>	12 DU	18	1	0	1	1	1	2
Project Total		<b>263</b>	<b>14</b>	<b>19</b>	<b>33</b>	<b>15</b>	<b>12</b>	<b>27</b>
Existing								
General Office <sup>1</sup>	31 KSF	<b>302</b>	<b>31</b>	<b>5</b>	<b>36</b>	<b>6</b>	<b>30</b>	<b>36</b>
<b>Net New Total Trips</b>		<b>(39)</b>	<b>(17)</b>	<b>14</b>	<b>(3)</b>	<b>9</b>	<b>(18)</b>	<b>(9)</b>

Notes: DU = dwelling units  
 KSF = 1,000 square feet

Source: 1. *Trip Generation, 10<sup>th</sup> Edition* (Institute of Transportation Engineers [ITE], 2017)  
 2. *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines* (LADOT, 2019)

## VEHICLE MILES TRAVELED (VMT) ASSESSMENT

SB 743, signed by the California Governor in 2013, changed the way transportation impacts are identified. Specifically, the legislation has directed the Office of Planning and Research (OPR) to look at different metrics for identifying transportation as an impact under California Environmental Quality Act (CEQA). The Final OPR guidelines, released in November 2017, identify VMT as the preferred metric for traffic impact analysis moving forward. The City of Lake Forest has not adopted thresholds of significance related to VMT, so this assessment was conducted consistent with the Technical Advisory<sup>1</sup> prepared by OPR.

According to the Technical Advisory, agencies such as Lake Forest may “use ‘screening thresholds’ to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.”

<sup>1</sup> *Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor’s Office of Planning and Research, State of California, December 2018.* [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)



There is a presumption of less-than-significant impact for residential development as “infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. Further, low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available. In areas where existing jobs-housing match is closer to optimal, low income housing nevertheless generates less VMT than market-rate housing. Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development”

Since the proposed Project is 100 percent affordable housing, it is presumed to result in a less-than-significant transportation impact related to VMT.

## CONCLUSION

The Project is anticipated to generate less trips during the AM and PM peak hours as compared to the existing office building. Project traffic distribution is assumed to assign traffic in all directions. Therefore, the Project traffic would result in intersection operations equal to or better than existing operations in the vicinity of the Project site.

Consistent with the Technical Advisory provided by OPR, the proposed Project is presumed to result in a less-than-significant transportation impact related to VMT since it is 100 percent affordable housing.