

MEMORANDUM

DATE: June 24, 2024

To: Bryan Miranda, LaTerra Development, LLC

FROM: Ken Wilhelm, LSA

SUBJECT: Trip Generation/Vehicle Miles Traveled Assessment for 25802 & 25831 Victoria Boulevard, Dana Point, California

This memorandum analyzes the potential for a proposed self-storage project, located at 25802 & 25831 Victoria Boulevard, Dana Point, California to result in significant transportation impacts according to thresholds established by the State of California, County of Orange, and City of Dana Point (City).

PROJECT DESCRIPTION

The proposed project is the addition of two 3-story self-storage buildings totaling 141,688 square feet (sf). The existing site includes boat storage (approximately 222 spaces) and 6,778 sf office use.

TRIP GENERATION

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*, 11th Edition (2021). ITE Land Use 151 (Mini-Warehouse) identifies trip generation rates for the proposed uses. In addition, the proposed project would remove approximately 222 Boat storage spaces and 6,778 sf office use on site. The project's trip generation for the Boat storage spaces was forecast by employing site-specific trips surveyed for a similar use. RV/Boat/Vehicle storage facilities in Chino and Ontario, California were used to identify the existing trip generation on site. The trip characteristics of these facilities are similar to the project site, as customers store their boats or vehicles and extract them for recreational purposes when needed. Trip generation surveys for these facilities are provided as an attachment. Trips for the RV/Boat/Vehicle storage spaces were calculated using average trip rates derived from the collected trip generation surveys at both facilities. 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 Rates ¹									
Mini-Warehouse (151)	–	TSF	1.45	0.05	0.04	0.09	0.07	0.08	0.15
General Office (710)	–	TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44
RV/Boat/Vehicle Storage ²	–	Space	0.48	0.02	0.01	0.03	0.02	0.02	0.04
Trip Generation									
Existing Uses to be Demolished									
RV/Boat Storage	222	Spaces	107	4	2	6	4	4	8
Office Use	6.778	TSF	73	9	1	10	2	8	10
Subtotal			180	13	3	16	6	12	18
Proposed Project									
Mini-Warehouse	141.688	TSF	205	7	6	13	10	11	21
New Trip Generation			25	-6	3	-3	4	-1	3

¹ Trip rates are referenced from the Institute of Transportation Engineers Trip Generation Manual, 11th Edition (2021).

² The daily, total a.m., and p.m. peak-hour trips are based on survey data collected at the existing similar facilities in Chino and Ontario (2021). 50% inbound and 50% outbound is assumed for the peak hours of RV/Boat storage.

ADT = average daily trips

TSF = thousand square feet

As shown in Table A, the anticipated net trip generation for the project is 25 daily trips, of which there would be 3 fewer trips in the a.m. peak hour and 3 new trips in the p.m. peak hour.

Because the project is anticipated to generate a nominal number of new peak hour trips, a traffic impact study would not be required.

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 released the *Technical Advisory for Evaluating Transportation Impacts under CEQA* (2018).

The State's technical 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 in transit priority areas, projects in low VMT areas, and certain project types that are local-serving or generate a small number of trips. Per the State's guidelines:

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.

Certification of revised CEQA guidelines occurred on December 28, 2018. As part of this certification, a deadline of July 1, 2020, was established for jurisdictions to adopt thresholds for evaluation of transportation impacts according to VMT. The City of Dana Point did not prepare revised traffic impact guidelines or separate VMT analysis guidelines by the July 1, 2020, deadline. However, State CEQA Guidelines Section 15064.7(c) states the following:

When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency is supported by substantial evidence.

While the City has not adopted specific VMT thresholds, the County of Orange (County) adopted the *County of Orange Guidelines for Evaluating Vehicle Miles Traveled under CEQA* (County Guidelines). The County Guidelines establish screening criteria for land use projects that would not exceed an applicable threshold of significance. One of the screening criteria is for small projects. The County Guidelines establish a screening criteria of 500 average daily trips based on the substantial evidence that this traffic volume correlates to greenhouse gas emissions below the typical emissions threshold of 3,000 metric tons of carbon dioxide equivalent.

As shown in Table A (above), the proposed self-storage project is expected to generate 205 ADT. Taking credit for the existing uses, the project would generate a small number of daily trips (25 net new ADT). Because the project would generate fewer than 500 ADT based on the County's guidelines, and fewer than 110 daily net vehicle trips based on the State's guidelines, the project meets the criteria for a less than significant VMT impact. Therefore, the proposed project would result in a less than significant transportation impact, and a project-level VMT quantified analysis is not required.

CONCLUSION

Because the proposed project would not generate a significant number of a.m. or p.m. peak-hour trips, a traffic impact analysis should not be required. In addition, the proposed project would be assumed to have a less than significant impact on transportation according to the State and County guidance on evaluating transportation impacts under CEQA. This conclusion would support a CEQA (Class 32) Exemption.

Attachment: RV/Boat storage trip generation surveys

RV/Boat Storage Trip Generation Surveys

1 Chino Location:	292	spaces	
Date	AM Peak Hour	PM Peak Hour	Daily
15-Jun	13	11	134
16-Jun	10	16	115
17-Jun	4	15	121
Average	9	14	123

Rate (trips per parking space)	0.03	0.05	0.42
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2 Ontario Location:	815	spaces	
Date	AM Peak Hour	PM Peak Hour	Daily
15-Jun	23	33	435
16-Jun	22	35	438
17-Jun	24	31	432
Average	23	33	435

Rate (trips per parking space)	0.03	0.04	0.53
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Average Rate between both sites			
Location	AM Peak Hour	PM Peak Hour	Daily
Chino	0.03	0.05	0.42
Ontario	0.03	0.04	0.53
Average Rate (Trips per Space)	0.03	0.04	0.48