



VEHICLE MILES TRAVELED (VMT) TECHNICAL MEMORANDUM

To: Mr. Sibley Simon, Managing Director
Clocktower Center, LLC

Date: October 28, 2024

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LLG Ref: 2.24.4879.1

Subject: ***Vehicle Miles Traveled (VMT) Screening Assessment for the Proposed Clocktower Center, Santa Cruz***

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As requested, Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Screening Assessment Memorandum for the proposed Clocktower Center Project (hereinafter referred to as “Project”), located in the City of Santa Cruz, Santa Cruz County, California. This VMT Screening Memorandum presents the VMT screening criteria, assessment methodology, and conclusion. It should be noted that the approach and methodology outlined in this Screening Memorandum are consistent with the *SB 743 Implementation Guidelines City of Santa Cruz (dated May 12, 2022)*, which provides additional detail on the language and analysis procedures described in this Screening Memorandum.

PROJECT DESCRIPTION

The Project site is located at 2020 North Pacific Avenue and 113 Knight Street in the City of Santa Cruz, Santa Cruz County, California. The existing Project site is currently occupied by a 7,827 Square Foot (SF) bank building and a 2,698 SF realtor office and Bar, which will be demolished. The Project applicant is proposing to construct 7,757 SF of commercial/retail space and 221 apartments as shown below:

- 98 Units (1 Bedroom 1 Bathroom)
- 9 Units (1 Bedroom with Den)
- 1 Units (2 Bedroom 1 Bathroom)
- 22 Units (2 Bedroom 2 Bathroom)
- 5 Units (3 Bedroom 2 Bathroom)
- 86 Units (Studio)

The proposed Project will include 49 parking spaces. Access to the Project site will be provided via driveways located along North Pacific Avenue and Knight Street.

Figure 1 presents the vicinity map that illustrates the general location of the Project site and surrounding street system while **Figure 2** displays the existing site aerial of

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the current site layout. **Figure 3** presents the conceptual site plan for the proposed project, prepared by *Workbench*.

PROJECT SCREENING CRITERIA

Project screening is used to determine if a project will be required to conduct a detailed VMT analysis. A detailed CEQA transportation analysis will not be required for land use elements of a project that meet one of the screening criteria. The following section discusses the various screening methods outlined in the *SB 743 Implementation Guidelines City of Santa Cruz (dated May 12, 2022)*, and outlines whether the Project will screen-out, either in its entirety, or partially based on individual land uses. It should be noted that in order to be screened out of a detailed VMT analysis, the proposed Project has to only satisfy one of the criteria.

Small Projects¹ Screening

The *SB 743 Implementation Guidelines City of Santa Cruz (dated May 12, 2022)* states:

“Expected to cause a less-than-significant impact:

- *Project generation is less than 110 trips per day*

CEQA transportation analysis required if:

- *It is inconsistent with the Sustainable Communities Strategy as determined by the City of Santa Cruz”*

Based on the *Trip Generation, 11th Edition, Institute of Transportation Engineers (ITE) [Washington, D.C. (2021)]*, the proposed Project will generate 1,003 daily trips for the residential component and 422 daily trips for the retail component, as shown in **Table 1 – Project Trip Generation Rates and Forecasts**.

The trips generated for both residential and retail land components will exceed the threshold of 110 daily trips. Thus, the proposed Project will not screen out under this criteria since both residential and retail components for the proposed Project will generate more than 110 daily trips.

Projects Near High Quality Transit² Screening

The *SB 743 Implementation Guidelines City of Santa Cruz (dated May 12, 2022)* states:

“Expected to cause a less-than-significant impact:

- *Within a ½ mile of an existing major transit stop.*

¹ 2018 OPR Guidance, page 12

² 2018 OPR Guidance, page 13

- *Maintains a service interval frequency of 15 minutes or less during the morning and afternoon peak commute periods.*

CEQA transportation analysis required if:

- *Has a Floor Area Ratio (FAR) of less than 0.75*
- *Includes more parking for use by residents, customers, or employees of the project than required by the City of Santa Cruz*
- *It is inconsistent with the Sustainable Communities Strategy as determined by the City of Santa Cruz*
- *Replaces affordable residential units with a smaller number of moderate- or high-income residential units”*

Figure 4 presents the Bus Routes within half-mile of Project site (*Bus Map dated September 2024*) within the City of Santa Cruz. Based on the figure, there is an existing major transit stop, River Front Transit Center, within a ½ mile of the proposed Project site, and Bus Routes 1, 18, 19, 2, 3, 11, 35, 90x, 4, 16, 17, 20, 40, and 41 are operating within this transit center. Among them, Bus Route 1, 18, and 19 maintains a service interval frequency of 15 minutes during the morning and afternoon peak commute period.

Floor Area Ratio (FAR) Assessment

Floor Area Ratio (FAR) is the measurement of a building's floor area in relation to the size of the lot/parcel that the building is located on and is derived by dividing the total area of the building by the total area of the parcel. According to the Site Plan in *Figure 3*, the proposed Project will have a building gross area of 174,850 SF and the Project lot is 27,673 SF. Therefore, the FAR for the proposed Project can be calculated as follows:

$$FAR = \frac{174,850 \text{ SF}}{27,673 \text{ SF}} = 6.32$$

Based on the above calculation, the proposed Project has a FAR more than 0.75. Thus, this criteria is not satisfied for requiring the CEQA transportation analysis.

Parking Assessment

Per *City of Santa Cruz Municipal Code Chapter 24.12.240 – Number of Parking Spaces Required*, the following parking requirements have been applied to the proposed Project:

Table 2 - Number of Parking Spaces Required Rates

Use	Spaces Required
Retail stores, shops, service establishments, including shopping centers other than furniture and appliance stores	1 for each 250 square feet of floor area
Community housing projects, townhouses, and multifamily projects of 5 units or more	Efficiency: 1.0 1 Bedroom: 1.0 2+ Bedroom: 2.0 In addition to meeting above residential parking requirements, guest parking spaces shall be provided at a rate 10% of the above standards. Fractional spaces will be rounded up to the next whole number.

Application of the above City parking requirements and the Project's proposed and provided parking is summarized in the table below:

Table 3. Number of Parking Spaces Required and Provided

Description	Required Per Code	Provided Parking Space
98 Units (1 Bedroom 1 Bathroom)	98	16 Standard Spaces 3 Accessible Spaces (Including 1 Van Space) 30 Tandem Stacker Spaces 6 EV Ready
9 Units (1 Bedroom with Den)	9	
1 Units (2 Bedroom 1 Bathroom)	2	
22 Units (2 Bedroom 2 Bathroom)	44	
5 Units (3 Bedroom 2 Bathroom)	10	
86 Units (Studio)	86	
Guest Parking	25	
7,757 SF Retail	31	
Total	305	49

As shown above, the proposed Project will provide less parking spaces than the required by the City. Thus, this criteria is not satisfied for requiring the CEQA transportation analysis.

Sustainable Communities Strategy Assessment

As shown in *Figure 3*, the proposed Project is located in the Zoning District "CBD – Central Business District" and the general plan designation is "RVC – Regional Visitor Commercial". The proposed Project is a mixed-use project as well as a redevelopment project and it will construct 221 apartments. As envisioned in Santa Cruz County's Sustainability Update, sustainable communities include attractive, healthy and walkable neighborhoods with housing available to all income levels; a vibrant economy; and transportation choices that enhance the



quality of life and reduce greenhouse gas emissions. Development is focused within urban areas to protect the environment and open space.

Based on our understanding, the Project is consistent with the Sustainable Communities Strategy, thus this criteria is not satisfied for requiring the CEQA transportation analysis.

Replacing Affordable Housing Assessment

This assessment is not applicable for the proposed Project since it is not replacing affordable housing.

Projects Near High Quality Transit Screening Conclusion

Based on the above, the proposed Project will screen out under this criteria and will not require the CEQA transportation analysis.

Local-Serving Retail³ Screening

The *SB 743 Implementation Guidelines City of Santa Cruz* (dated May 12, 2022) states:

“Expected to cause a less-than-significant impact:

- *No single store on-site exceeds 50,000 square feet*
- *Project is local-serving as determined by the City of Santa Cruz*

CEQA transportation analysis required if:

- *If the nature of the service is regionally focused as determined by the City of Santa Cruz”*

As described in the Project description, the retail component of the proposed Project is 7,757 SF, which is less than the threshold of 50,000 SF. Additionally, as determined by the City of Santa Cruz, it is local-serving retail and not regionally focused.

This criteria is not applicable to the residential component of the proposed Project.

Based on the above, the proposed Project will partially screen out under this criteria since the retail component of the proposed Project can be screened out, but is not applicable for the residential component.

³ 2018 OPR Guidance, page 16

Affordable Housing⁴ Screening

The *SB 743 Implementation Guidelines City of Santa Cruz* (dated May 12, 2022) states:

“Expected to cause a less-than-significant impact:

- *A high percentage of affordable housing is provided as determined by the City of Santa Cruz*

CEQA transportation analysis required if:

- *The percentage of affordable housing is determined by the City of Santa Cruz to not be high in relation to the residential element of a project”*

The proposed Project is not a 100% affordable housing project. As shown in *Figure 3*, the jurisdiction requires inclusionary housing at the following percentage of base 111 units: 20.0% (22 units) reserved for lower-income households. The proposed Project complies with inclusionary housing requirements by providing 10 moderate-income units, 6 lower-income units, and 16 very-low-income units for a total of 32 units.

This criteria is not applicable to the retail component of the proposed Project.

Thus, the proposed Project will not screen out under this criteria since the since it does not provide a high percentage of affordable housing as required by the jurisdiction.

Local Essential Service⁵ Screening

The *SB 743 Implementation Guidelines City of Santa Cruz* (dated May 12, 2022) states:

“Screening allowed if:

- *Day care center*
- *Public K-12 School*
- *Police or Fire facility*
- *Medical/Dental office building*
- *Government offices (in-person services such as post office, library, and utilities)*
- *Supportive Housing Types (assisted living, permanent supportive housing, memort care, etc)*

⁴ 2018 OPR Guidance, page 14. As described, “Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence.”

⁵ Based on assumption that, like local-serving retail, the addition of necessary local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their non-discretionary nature.

CEQA transportation analysis required if:

- *If the nature of the service is regionally focused as determined by the City of Santa Cruz”*

Based on the above, the proposed Project will not screen out under this criteria since it is not a local essential service project.

Map-Based Screening⁶

The *SB 743 Implementation Guidelines City of Santa Cruz* (dated May 12, 2022) states:

“Expected to cause a less-than-significant impact:

- *Area of development is under threshold as shown on screening map as allowed by City of Santa Cruz*

CEQA transportation analysis required if:

- *Represent significant growth as to substantially change regional travel patterns as determined by the City of Santa Cruz”*

For the residential component of the proposed Project, the VMT is 5.7, which is below the threshold of 8.9 and the retail component qualifies for the local retail exemption, as confirmed by the City.

Based on the above, the proposed Project will screen out under this criteria since they are under the thresholds and will not require the CEQA transportation analysis.

Redevelopment Projects⁷ Screening

The *SB 743 Implementation Guidelines City of Santa Cruz* (dated May 12, 2022) states:

“Expected to cause a less-than-significant impact:

- *Project replaces an existing VMT-generating land use and does not result in a net overall increase in VMT*

CEQA transportation analysis required if:

- *Project replaces an existing VMT-generating land use and results in a net overall increase in VMT”*

This screening analysis has not been conducted since the Project screens out in its entirety under two screening criteria.

⁶ 2018 OPR Guidance, page 12

⁷ 2018 OPR Guidance, Page 18

CONCLUSION

Based on the *SB 743 Implementation Guidelines City of Santa Cruz (dated May 12, 2022)*, the VMT screening methodology, criteria, analysis and results outlined in this Technical Memorandum, the proposed Project will screen out since it is within a TPA and satisfies the Map-Based Screening criteria. Therefore, the proposed Project is exempt from the preparation of any further VMT analysis and may be presumed to have a less than significant CEQA related transportation impact.

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We appreciate the opportunity to provide this Technical Memorandum. Should you have any questions regarding the Technical Memorandum, please contact us at (949) 825-6175.





TABLE 1
PROJECT TRIP GENERATION RATES AND FORECAST⁸

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Trip Generation Rates:</u>							
▪ 221: Multifamily Housing Mid Rise (Not Close to Rail) (TE/DU)	4.54	23%	77%	0.37	61%	39%	0.39
▪ 710: General Office Building (TE/TSF)	10.84	88%	12%	1.52	17%	83%	1.44
▪ 822: Strip Retail Plaza Less Than 40K (TE/TSF)	54.45	60%	40%	2.36	50%	50%	6.59
▪ 911: Walk-In Bank (TE/TSF) ⁹	--	--	--	--	44%	56%	12.13
▪ 912: Drive-In Bank (TE/TSF)	100.35	58%	42%	9.95	50%	50%	21.01
▪ 975: Drinking Place (TE/TSF)	--	--	--	--	66%	34%	11.36
<u>Existing Project Trip Generation Forecast:</u>							
▪ Bank (7,827 SF)	785	45	33	78	42	53	95
Pass-By (Daily: 25%, AM: 29%, PM: 35%) ¹⁰	<u>-196</u>	<u>-13</u>	<u>-10</u>	<u>-23</u>	<u>-15</u>	<u>-18</u>	<u>-33</u>
Existing Bank Subtotal	589	32	23	55	27	35	62
▪ Realtor Office (1,349 SF)	15	2	0	2	0	2	2
▪ Bar (1,349 SF) ¹¹	150	--	--	--	10	5	15
Existing Project Total [A]	754	34	23	57	37	42	79
<u>Proposed Project Trip Generation Forecast:</u>							
▪ Apartments (221 DU)	1,003	19	63	82	52	34	86
▪ Retail (7,757 SF)	422	11	7	18	26	25	51
Pass-By (Daily: 10%, AM: 10%, PM: 40%) ¹⁰	<u>-42</u>	<u>-1</u>	<u>-1</u>	<u>-2</u>	<u>-10</u>	<u>-10</u>	<u>-20</u>
Retail Subtotal	380	10	6	16	16	15	31
Proposed Project Total [B]	1,383	29	69	98	68	49	117
Total Net Proposed Project Trip Generation Forecast [B] – [A]	629	-5	46	41	31	7	38

Notes:

- TE/DU = Trip End per Dwelling Unit
- TE/TSF = Trip End per Thousand Square Feet

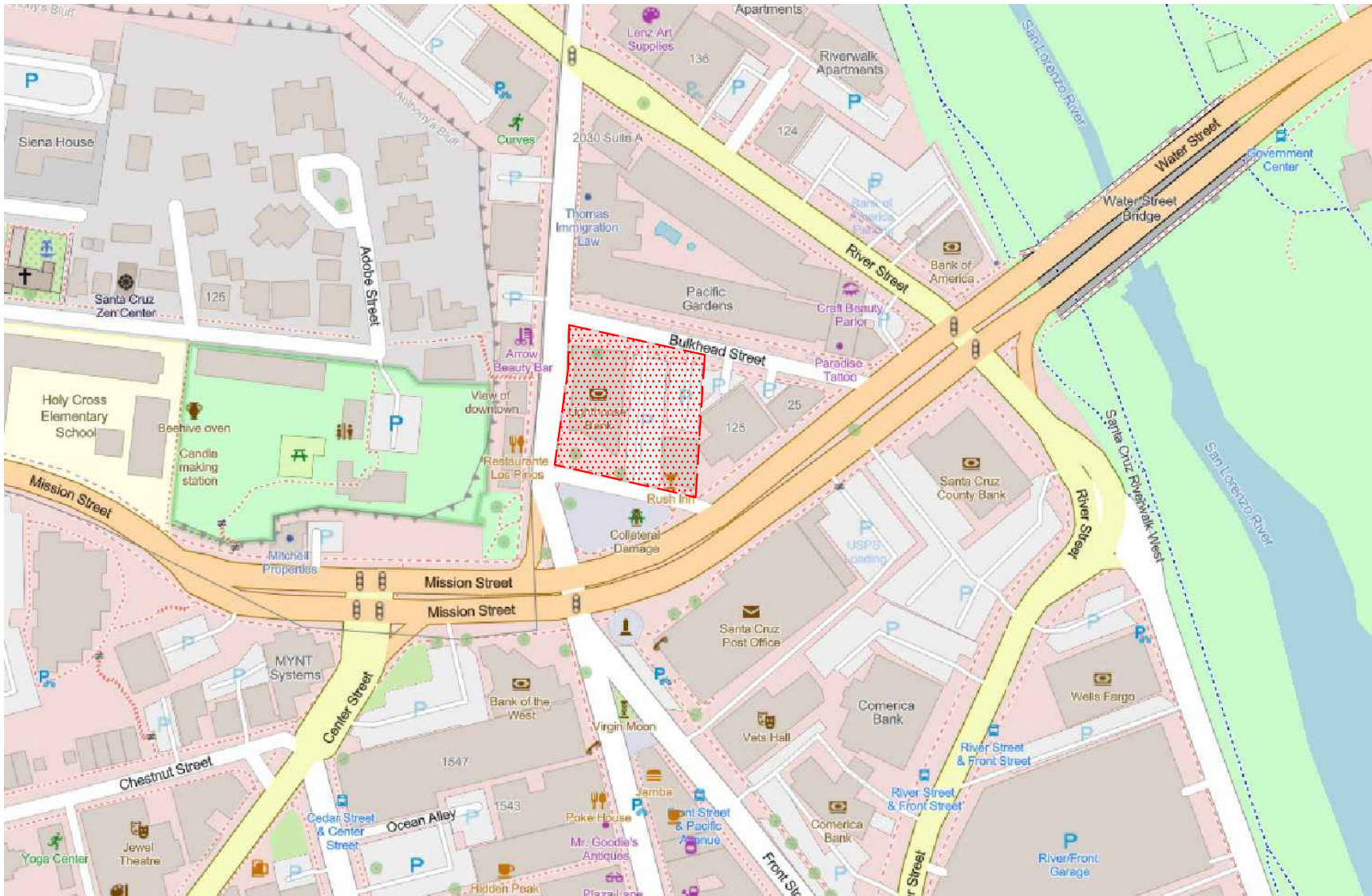
⁸ Source: *Trip Generation, 11th Edition*, Institute of Transportation Engineers, (ITE) [Washington, D.C. (2021)].

⁹ It should be noted that the *Trip Generation Manual, 11th Edition, ITE 2021* does not provide Daily and AM rates for ITE Land Use 911: Walk-In Bank therefore, ITE Land Use 912: Drive-In Bank Daily and AM rates were applied to calculate the Daily and AM trips for the existing bank.

¹⁰ Pass-By Trips are trips made as intermediate stops on the way from an origin to a primary trip destination. Pass-by trips are attracted from traffic passing the site on adjacent streets, which contain direct access to the generator. For this analysis, the following pass-by reduction factors were used (Source: *Trip Generation Manual, 11th Edition, ITE 2021*):

- 822: Strip Retail Plaza: Daily/AM Peak Hour/PM Peak Hour = 10% (assumed)/10% (assumed)/40% (assumed)
- 912: Drive-In Bank: Daily/AM Peak Hour/PM Peak Hour = 25% (assumed)/29%/35%

¹¹ It is assumed that the PM Peak Hour trips for the bar are 10% of Daily trips.



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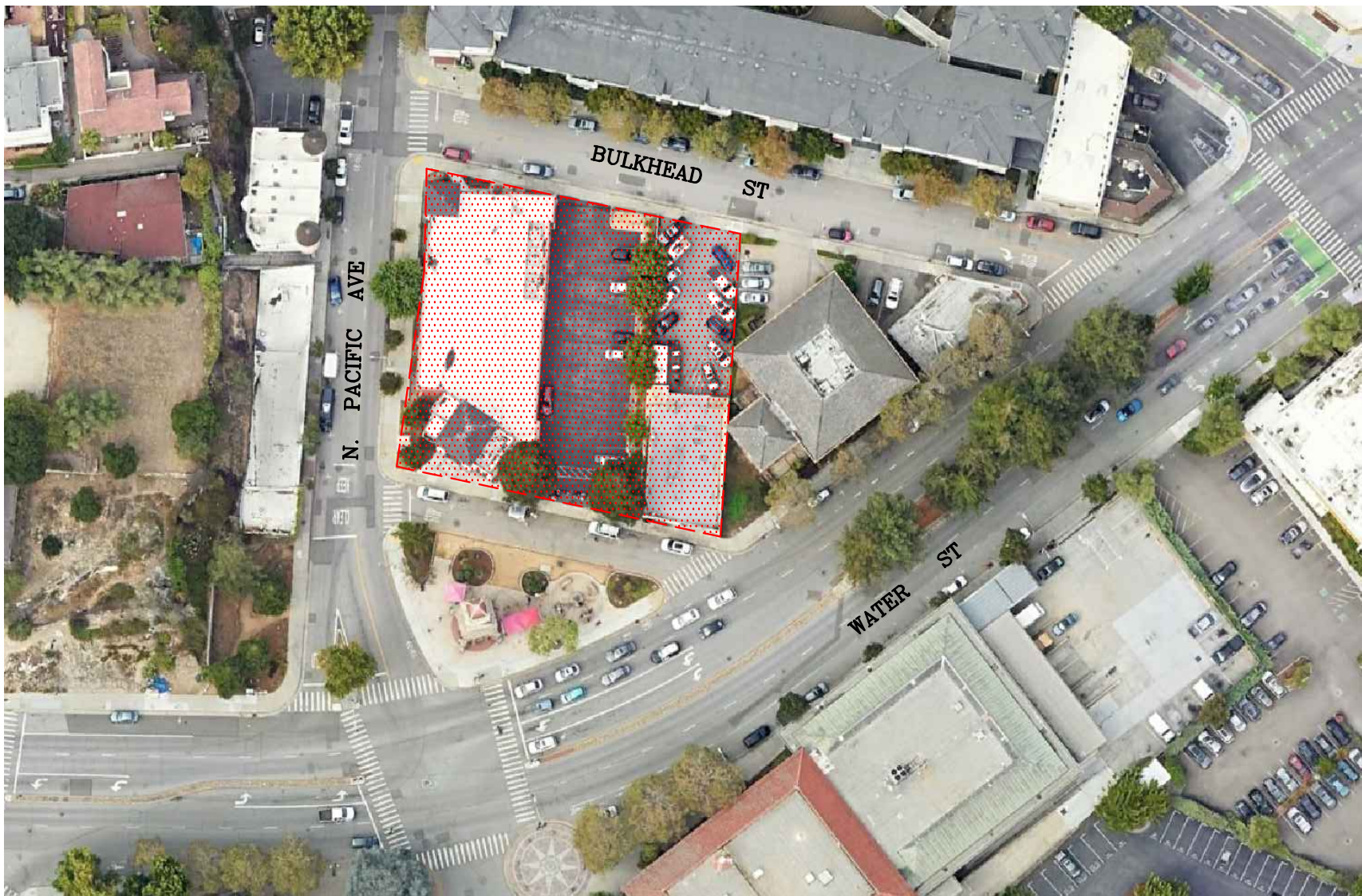
SOURCE: OPEN STREETS

KEY

 = PROJECT SITE

FIGURE 1

VICINITY MAP
CLOCKTOWER CENTER, SANTA CRUZ



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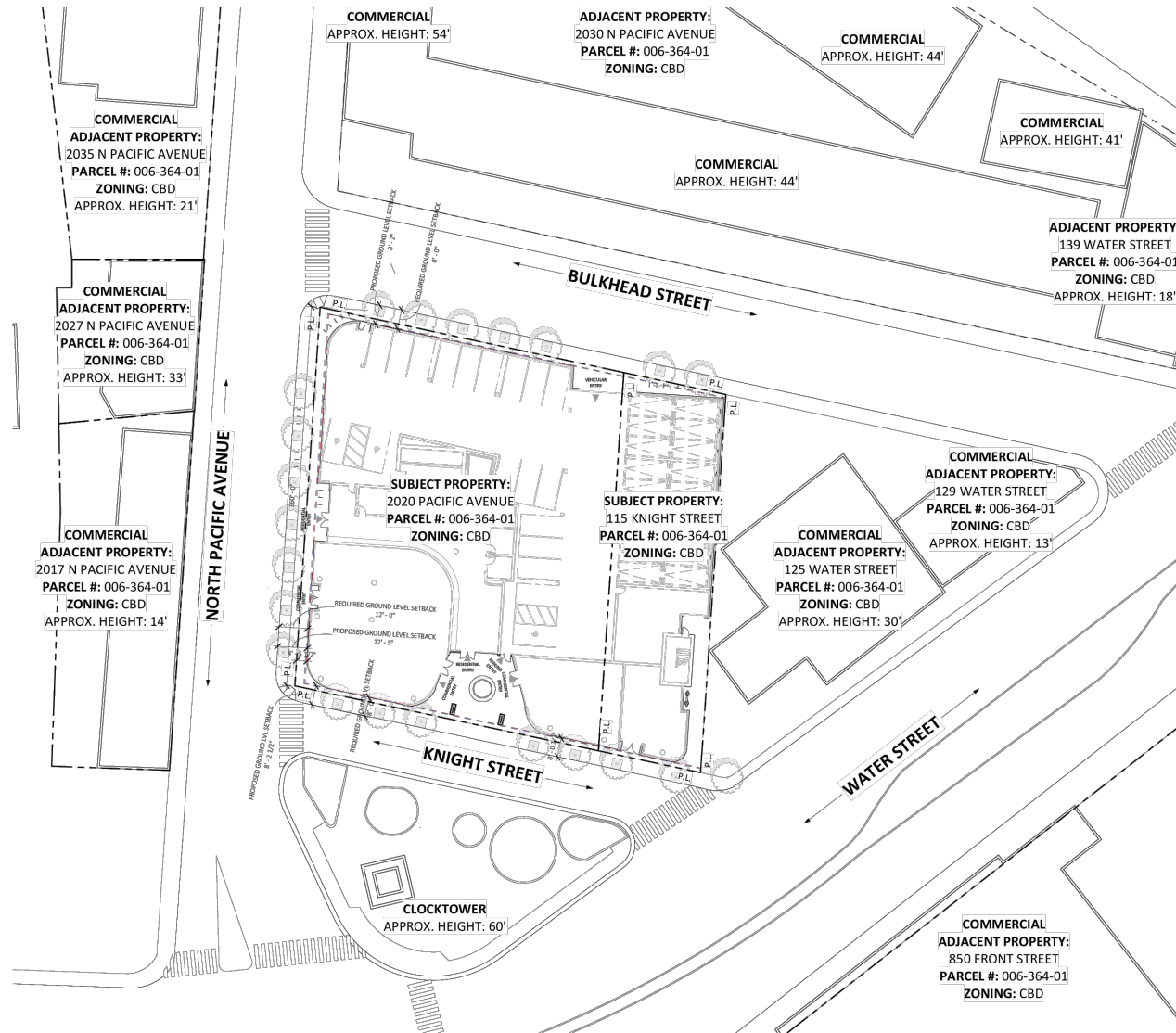
SOURCE: GOOGLE

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 = PROJECT SITE

FIGURE 2

EXISTING AERIAL PHOTOGRAPH
CLOCKTOWER CENTER, SANTA CRUZ



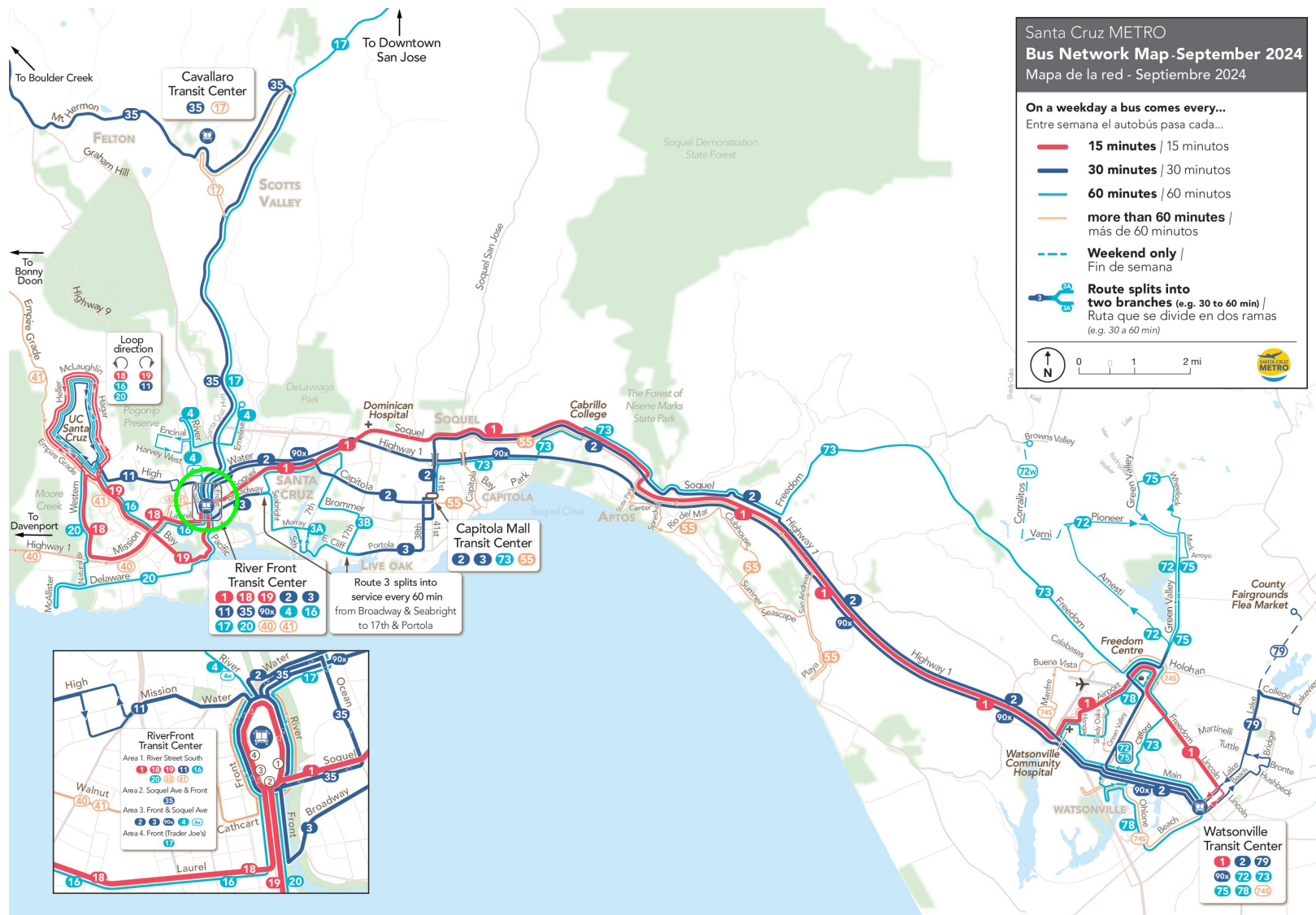
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SOURCE: WORKBENCH



FIGURE 3

CONCEPTUAL SITE PLAN
CLOCKTOWER CENTER, SANTA CRUZ



SOURCE: SANTA CRUZ METRO

KEY

○ = HALF-MILE RADIUS



FIGURE 4

BUS ROUTES WITHIN HALF-MILE OF PROJECT SITE
 CLOCKTOWER CENTER, SANTA CRUZ