



**DECEMBER 30, 2025**

Mr. Matt Hamilton  
HAMILTON LAND DEVELOPMENT, INC.  
100 Spectrum Center Drive, Suite 1400  
Irvine, CA 92618

**SUBJECT: FLETCHER AVENUE SINGLE-FAMILY RESIDENTIAL PROJECT REVISED VEHICLE MILES TRAVELED (VMT) SCREENING ANALYSIS, CITY OF ORANGE**

Dear Mr. Hamilton:

**INTRODUCTION**

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this Revised Vehicle Miles Traveled (VMT) Screening Analysis for the proposed Fletcher Avenue Single-Family Residential Project (hereinafter referred to as “project”).

The purpose of this study is to utilize the *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment*, dated July 2025 (City's TIA & VMT Guidelines) which establishes uniform analysis methodologies and thresholds of significance for determining LOS as well as VMT impacts under the California Environmental Quality Act (CEQA), to determine if the project will require a detailed VMT modeling analysis.

**PROJECT DESCRIPTION**

The project site is located at 705 & 715 West Fletcher Avenue, in the City of Orange. The project was previously occupied by Bill’s Sweeping Service for 30+ years but ceased operations approximately 3 years ago. Based on information provided by the client, the prior business was supported daily by approximately 30 employees. The site has remained vacant since. The proposed project consists of constructing fifteen (15) single-family detached dwelling units (14 market-rate and 1 affordable).

Access to the project site is proposed via one (1) existing full-access unsignalized driveway located along Fletcher Avenue.

**Exhibit A** shows a location map of the project site. **Exhibit B** shows the project’s proposed site plan.

## VEHICLE MILES TRAVELED (VMT) SCREENING ASSESSMENT

The City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, dated July 2025, (City's VMT Guidelines) provides recommendations in the form of thresholds of significance and methodologies for identifying VMT related impacts. The proposed project is subject to a VMT screening analysis and will adhere to the recommendations and practices described in the City's guidelines.

The City of Orange has developed three types of screening criteria that can be applied to effectively screen projects from project-level assessment. The screening steps are identified below:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

### **Step 1: Transit Priority Area (TPA) Screening**

According to the City's VMT Guidelines, "Projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary." However, this presumption may not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for than required by City requirements;
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate or high-income residential units.

A transit priority area is defined as a half mile area around an existing major transit stop or a high-quality transit corridor. A major transit stop refers to a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor refers to a corridor with fixed route bus service intervals no longer than 15 minutes during peak commute hours.

Based on RK's assessment of the bus stops located within a half-mile radius of the project site, the Project is not located within a transit priority area. As such, the Project does not meet the Step 1: Transit Priority Area (TPA) Screening Criteria.

**Step 2: Low VMT Area Screening**

Per the City's VMT Guidelines, residential and office projects located within a low VMT-generating area are presumed to have a less than significant impact absent substantial evidence to the contrary.

To identify if the project is in a low VMT-generating area, the City of Orange VMT Guidelines recommend utilizing the North Orange County Collaborative (NOCC+) VMT Screening Tool, which is an excel-based tool developed using the Orange County Transportation Analysis Model (OCTAM) 5.0. As such, the NOCC+ tool has been utilized to determine if the project is in a low VMT-generating area which is shown in **Appendix A**.

As shown in Appendix A, the proposed project is located within OCTAM TAZ #420, and the NOCC+ tool specifies to review the reference maps included with the tool to determine if the project is located within a low-VMT generating area. Therefore, Appendix A also includes the map that shows the OCTAM Model's daily total OD VMT per service population for base year 2016 in comparison to the city average. As a result, it shows that the project is located within a zone where the VMT is more than 15% below the city average. In addition, it has been confirmed the project is consistent with the surrounding land uses within the TAZ (i.e., single-family detached).

**Therefore, the proposed project satisfies the low VMT area screening criteria and may be presumed to have a less than significant impact on VMT under CEQA. As such, no additional VMT analysis is required.**

**Step 3: Project Type Screening**

The City's VMT Guidelines specify that certain project types are eligible to screen from a project-level VMT assessment because they can be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature. These types of projects include:

- Local-Serving K-12 schools
- Local parks
- Day Care Centers
- Local Serving Retail Less than 50,000 square feet, including:
  - Gas stations
  - Banks
  - Restaurants
  - Shopping Center
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects on or adjacent to college campuses

- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (Public libraries, fire stations, local government)
- Affordable, supportive or transitional housing
- Assisted living facilities
- Senior housing (as defined by HUD)

As previously discussed, the proposed project consists of constructing fifteen (15) single-family detached dwelling units (14 market-rate and 1 affordable). Market rate single family housing is not a land use type identified for this screening criteria. As such, the project does not meet the Step 3: Project Type Screening Criteria.

**CONCLUSIONS**

RK Engineering Group, Inc. has completed this Revised Vehicle Miles Traveled (VMT) Screening Analysis for the proposed Fletcher Avenue Single-Family Residential Project.

The proposed project is screened out from a full VMT analysis based on the low VMT area screening criteria and may be presumed to have a less than significant impact on VMT under CEQA. Therefore, no additional VMT analysis is required.

RK Engineering Group, Inc. appreciates this opportunity to work with the HAMILTON LAND DEVELOPMENT, INC. on the Fletcher Avenue Single-Family Residential Project. If you have any questions regarding this review, or need further clarification, please contact us at (949) 474-0809.

Sincerely,

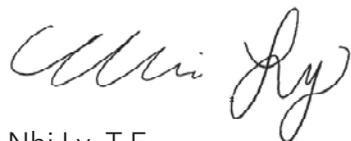
**RK ENGINEERING GROUP, INC.**



Justin Tucker, P.E., T.E.  
Principal




Sabrina Ayala  
Engineer I

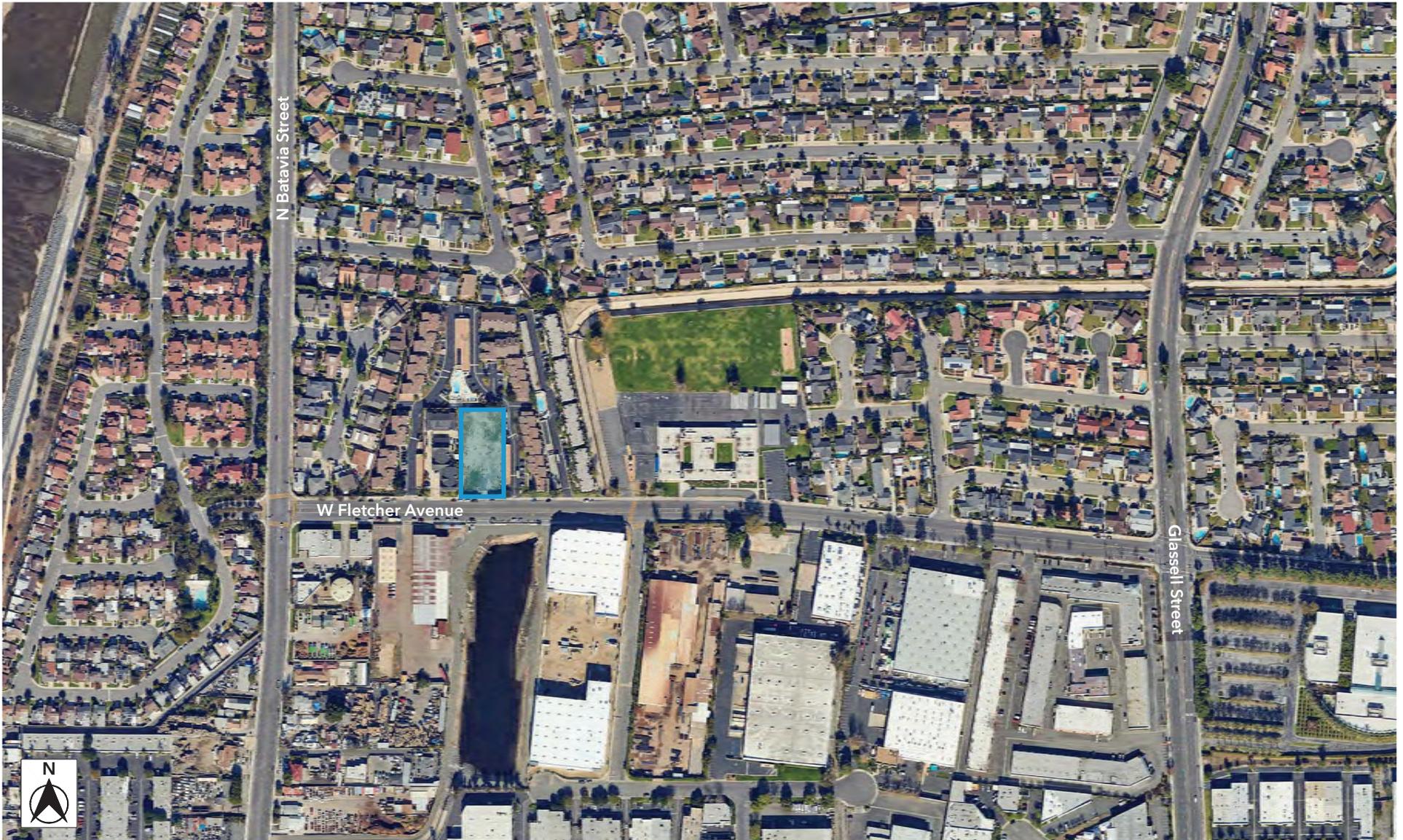


Nhi Ly, T.E.  
Engineer III

Attachments



# Exhibits

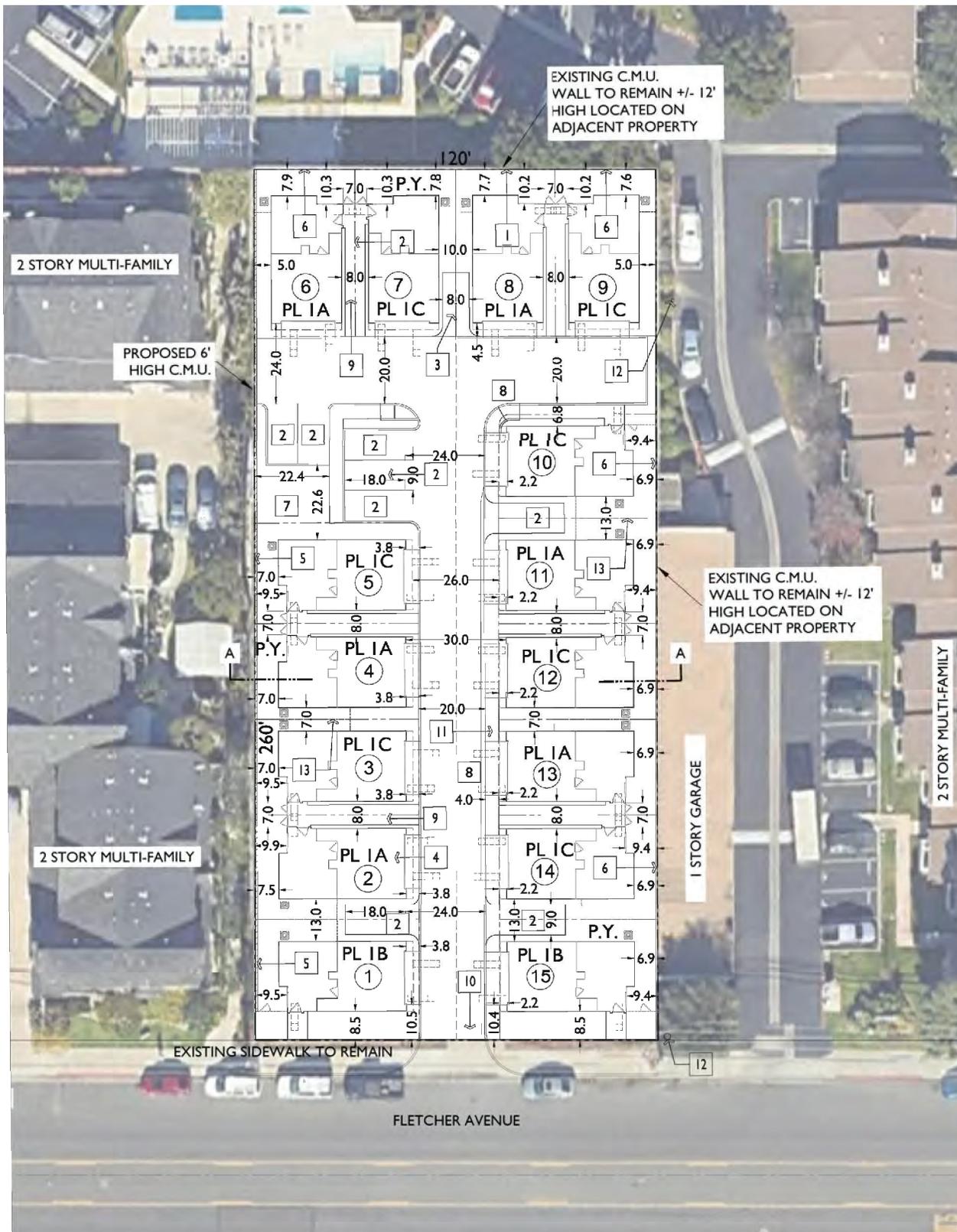


## Legend

 = Project Site Boundary

# Exhibit A

## Location Map



# Exhibit B

## Site Plan

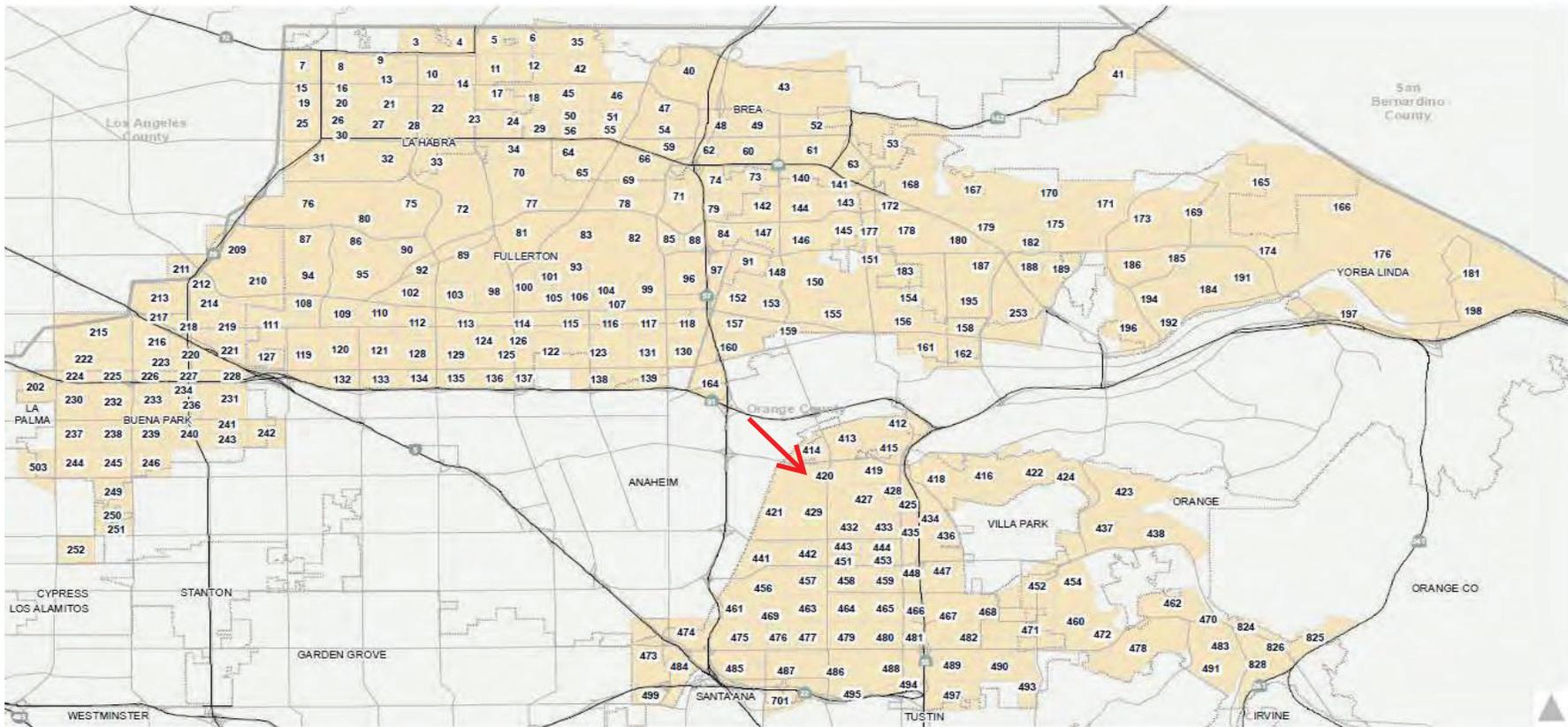


# Appendices



# Appendix A

## NOCC+ VMT Screening Tool



- Traffic Analysis Zone (TAZ)
- County Boundary
- City Limits



OCTAM Model  
North Orange County Traffic Analysis Zone (TAZ)



## North Orange County Collaborative VMT Traffic Study Screening Tool

### Project Information

|                                                   |              |
|---------------------------------------------------|--------------|
| Project Name                                      | Opening Year |
| Fletcher Avenue Single-Family Residential Project | 2027         |
| Parcel Number ( OCTAM TAZ#420 )                   |              |
| 374-261-10, 374-261-11                            |              |

### Screening Criteria for Orange

|                                                                                                        |        |
|--------------------------------------------------------------------------------------------------------|--------|
| Is the project location in a Transit Priority Area?                                                    | No     |
| Is the project location in a low VMT generating zone?                                                  | Review |
| Is the Project one of these land use types?<br>(show land use types)                                   | No     |
| Does the project generate fewer than 110 daily trips?<br>(enter project land use in the section below) | Yes    |

**The Project can be considered for screening from additional analysis.**  
Please refer to the 'secondary screening checks' table in the User Guide.

### Project Land Use Information

|                                   |       | Unit              |
|-----------------------------------|-------|-------------------|
| Residential : Single Family Homes | 15    | Dwelling Units    |
| Residential : MultiFamily Homes   | 0     | Dwelling Units    |
| Office                            | 0.000 | 1,000 Sqaure Feet |
| Retail                            | 0.000 | 1,000 Sqaure Feet |
| Industrial                        | 0.000 | 1,000 Sqaure Feet |
| Private School                    | 0     | Students          |
| University                        | 0     | Students          |
| Entertainment                     | 0.000 | 1,000 Sqaure Feet |
| Hotel                             | 0     | Rooms             |

### Project Trips and VMT Information

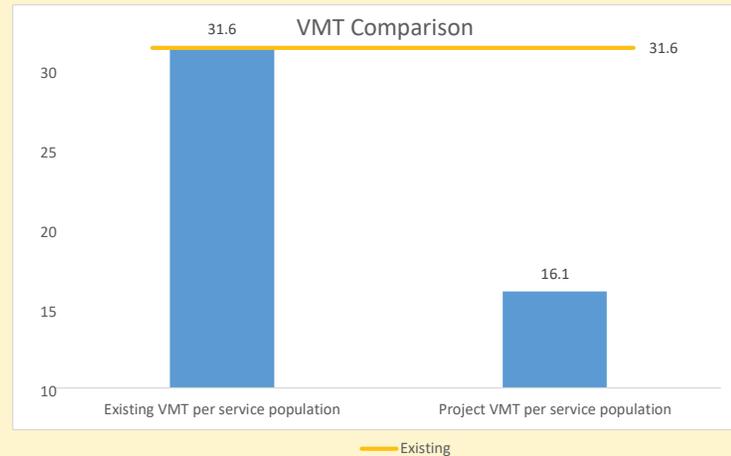
VMT Methodology

Daily Trips: 97 Average Trip Length: 7.5 Service Population: 45

VMT per service population 16.1

### Project VMT Thresholds Comparison

- OPR Guidance (15% Below Existing)
- GHG Reduction Targets (14.3% Below Existing)
- Below Existing
- Better than General Plan Buildout



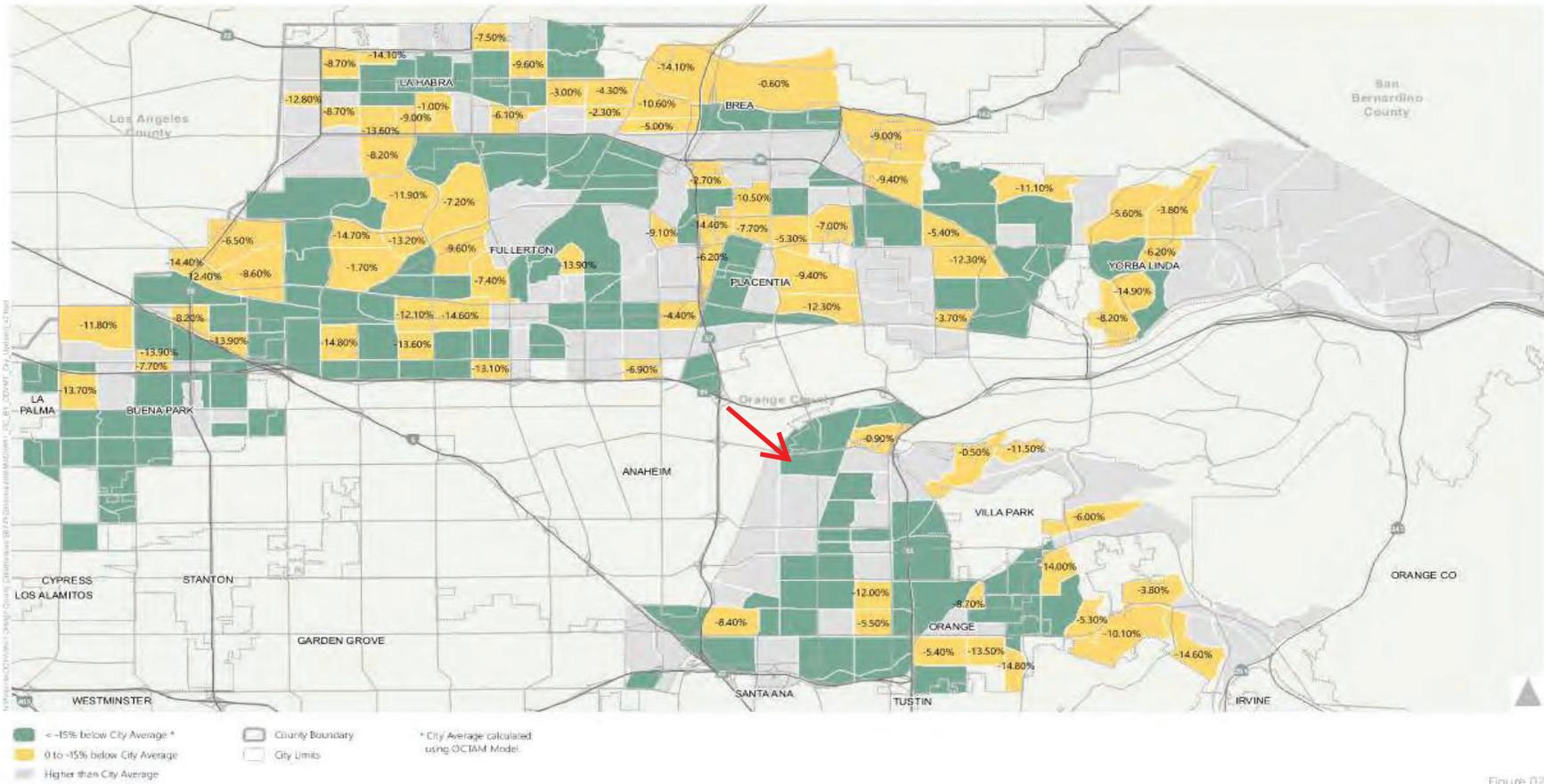


Figure 02

OCTAM Model  
Daily Total OD VMT per Service Population for Base Year 2016  
Comparison to City Average

