

To: City of Garden Grove  
From: Maryam Javanmardi, Simon Lin, EIT, Meghan Macias, TE  
EPD Solutions, Inc.  
Date: 3/17/2026  
Site: 9822 Russell Ave, Garden Grove, CA  
Subject: Vehicles Miles Traveled (VMT) Screening Analysis for  
9822 Russell Ave, Garden Grove Project  
EPD Project Number 25-142



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## Project Overview

This technical memorandum provides an evaluation of the proposed residential project (the Project) located at 9822 Russell Avenue in the central portion of the City of Garden Grove. The site is approximately 0.12 miles north of State Route 22 (SR-22) and one block west of Brookhurst Street, both of which provide regional access to the site. Local and direct access to the site is provided by Russell Avenue to the north and Kerry Street to the west. The purpose of this analysis is to determine if an in-depth vehicle miles traveled (VMT) analysis (VMT) would be required for the Project, or if it screens out per the City of Garden Grove's VMT Guidelines. This memo evaluates the Project using the City of Garden Grove *Traffic Impact Analysis (TIA) Guidelines for Vehicles Miles Traveled and Level of Service Assessment* (City's TIA Guidelines) (May 2020).

## Project Description

The Project site is identified as Assessor's Parcel Number (APN) 098-081-19 and is located within the United States Geologic Survey (USGS) Anaheim 7.5 Minute Series Topographic Quadrangle and within Section 5, Township 5 South, Range 10. The 1.81-acre Project site is currently developed with a church, preschool, daycare facility, parking lot, and landscaping areas. The church sanctuary is 7,700 square feet, the office and meeting rooms used by the church total 7,892 square feet, and the preschool/daycare is 2,875 square feet, which totals 18,467 square feet of building space on the site. The existing preschool/daycare facility (Orangefield Child Development Center) is for children ages 2 to 6 years and has a licensed capacity for 60 students.<sup>1</sup>

The Project requests approval from the City of Garden Grove to demolish the existing church, preschool, and daycare facility building and associated improvements on the Project site and construct 26 two-story townhome residences with open space/recreation and parking. Each residential unit would have three or four bedrooms, ranging in size from approximately 1,442 square feet to 1,800 square feet, and each unit would have a two-car garage. The 26 residences on the 1.81-acre site would result in a density of 14.4 units per acre. Development of the Project would include parking, open space, ornamental landscaping, and associated infrastructure.

The Project requests the approval of a General Plan Amendment to change the land use from Low-Density Residential (LDR) to Low-Medium Density Residential (LMR), which allows residential densities between 11 and 21 dwelling units per acre. The Project also includes a zone change to change the site zoning from R-1

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<sup>1</sup> California Department of Social Services. (2025). *Facility Detail: Orangefield Child Development Center*. Accessed: <https://www.cclld.dss.ca.gov/carefacilitysearch/FacDetail/304371054>

to Planned Unit Development (PUD) with a general R-2 (Limited Multiple Residential) zoning designation used as the base guiding standards. The proposed Project Site Plan is shown in Figure 1, included at the end of this document.

**Project Trip Generation**

The proposed Project trip generation was calculated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 12th Edition (2025)*. The existing church building was analyzed using the Church land use (ITE Land Use Code 560), the preschool/daycare facility was analyzed using the Day Care Center land use (ITE Land Use Code 565), and the proposed Project was analyzed using the Multifamily Housing land use (ITE Land Use Code 220).

Table 1 presents the trip generation estimates for the existing uses and the proposed Project. The existing uses are estimated to generate approximately 219 daily trips, including 37 trips during the AM peak hour and 38 trips during the PM peak hour. The proposed Project is anticipated to generate approximately 161 daily trips, with 11 trips during the AM peak hour and 14 trips during the PM peak hour. Overall, the Project would result in 58 fewer daily trips, including 26 fewer trips during the AM peak hour, and 24 fewer trips during the PM peak hour.

**Table 1: Project Trip Generation**

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
<b>Trip Rates</b>									
560 Church <sup>1</sup>	1000 Sq. Ft. GFA	6.78	0.23	0.14	0.37	0.18	0.25	0.43	
565 Day Care Center <sup>2</sup>	1000 Sq. Ft. GFA	39.3	5.77	5.11	10.88	5.05	5.7	10.75	
220 Multifamily Housing (Low-Rise) <sup>3</sup>	Dwelling Units	6.21	0.1	0.31	0.41	0.32	0.2	0.52	
<b>Project Trip Generation</b>									
<b>Existing Uses Trip Generation</b>									
Church <sup>1</sup>	15.59	1000 Sq. Ft. GFA	106	4	2	6	3	4	7
Day Care Center <sup>2</sup>	2.88	1000 Sq. Ft. GFA	113	16	15	31	15	16	31
<b>Proposed Project Trip Generation</b>									
Multifamily Housing (Low-Rise) <sup>3</sup>	26	Dwelling Units	161	3	8	11	9	5	14
<b>Total Existing Trip Generation</b>			<b>219</b>	<b>20</b>	<b>17</b>	<b>37</b>	<b>18</b>	<b>20</b>	<b>38</b>
<b>Total Project Trip Generation</b>			<b>161</b>	<b>3</b>	<b>8</b>	<b>11</b>	<b>9</b>	<b>5</b>	<b>14</b>
<b>Total Net New Trip Generation</b>			<b>-58</b>	<b>-17</b>	<b>-9</b>	<b>-26</b>	<b>-9</b>	<b>-15</b>	<b>-24</b>
<sup>1</sup> Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 560 - Church (Average Rate) <sup>2</sup> Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 565 - Day Care Center (Average Rate) <sup>3</sup> Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 220 - Multifamily Housing (Low-Rise) (Average Rate)									

## Vehicle Miles Traveled Screening

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines which states that VMT is the most appropriate measure of transportation impacts and shall apply statewide beginning on July 1, 2020.

The *CEQA Assessment – VMT Analysis* section of the City's TIA Guidelines provides VMT screening thresholds to identify projects that would be considered to have a less-than-significant impact on VMT and therefore could be screened from further analysis. If a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. Transit Priority Area (TPA) Screening.
2. Low VMT Area Screening.
3. Project Type Screening.

The applicability of each criterion to the project is discussed below.

Screening Criteria 1 – Transit Priority Area Screening (TPA)<sup>2</sup>: According to the City's TIA Guidelines, projects located in a TPA may be presumed to have a less-than-significant impact. The City's Guidelines also state that a project may not meet the screening threshold if the following project or location specific criteria are met:

- 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 jurisdiction (if the jurisdiction requires the project to supply parking);
- 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.

The Project site is located approximately 327 feet (0.062 miles) from Bus Stop ID 2187 and 500 feet (0.095 miles) from Bus Stop ID 2208, both served by Orange County Transportation Authority (OCTA) Route 35. This route does not operate at 20-minute or better headways during weekday peak periods (6:00–9:00 AM and 3:00–7:00 PM), thus the area does not qualify as a "major transit stop," and therefore does not meet the definition of a TPA. As a result, the Project does not meet the TPA screening criteria.

Screening Criteria 2 – Low VMT Area Screening: The City's TIA Guidelines use the Orange County Traffic Analysis Model (OCTAM) travel demand forecasting model to determine if a project is located in a low VMT generating area. Per these guidelines, projects located in Zone 1 areas, *Lower Than VMT Threshold*, can be presumed not to have a significant VMT impact and can be screened from VMT analysis.

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<sup>2</sup> A TPA is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor per the definition below:

AB 2553 - The bill defines a major transit stop to mean a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, the intersection of 2 or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods, or other major transit stops that are included in the applicable regional transportation plan.

As identified in Exhibit 4.14-5 of the Focused General Plan Update and Zoning Amendments Draft EIR (included as Figure 2, *Low VMT Area Screening*), the Project site is located within Zone 2, *Lower Than County Average*. Therefore, the site is in an area that has a lower than County average VMT but higher than the City of Garden Grove's VMT Threshold, and cannot be assumed to be less than significant. Therefore, the Project does not meet the Low VMT Area screening criteria.

**Screening Criteria 3 – Project Type Screening:** The City of Garden Grove Traffic Impact Analysis Guidelines identify specific land uses that qualify for Project Type Screening. Residential development is not included among the listed project types; therefore, the proposed townhome development does not qualify for Screening Criteria 3.

However, the Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018, updated January 22, 2019) prepared by the Governor's Office of Planning and Research states that projects replacing existing VMT-generating land uses and resulting in a net decrease in VMT compared to existing conditions would not result in a significant transportation impact.

As shown in Table 1, the Project located in Orange County Transportation Analysis Model (OCTAM) Version 5.1 Transportation Analysis Zone (TAZ) 539 would generate 58 fewer daily trips than the existing uses on the Project site. Table 2 shows that this reduction in trips would result in a decrease of approximately 446 VMT within the Project's TAZ. Therefore, the proposed Project would replace existing VMT-generating land uses and result in a net decrease in VMT. Based on this reduction, the Project would result in a less-than-significant VMT impact, and no additional VMT analysis would be required.

**Table 2: Project Net VMT**

	OCTAM 5.1		Project Site	TAZ 539
	Trips Generated	TAZ Average Trip Length <sup>1</sup>	Total VMT <sup>2</sup>	Total VMT <sup>1</sup>
With Existing Use	219	7.70	1,685	124,325
With Proposed Project	161	7.70	1,239	123,879
	<b>Net VMT</b>		<b>-446</b>	<b>-446</b>

<sup>1</sup> Source: OCTAM 5.1

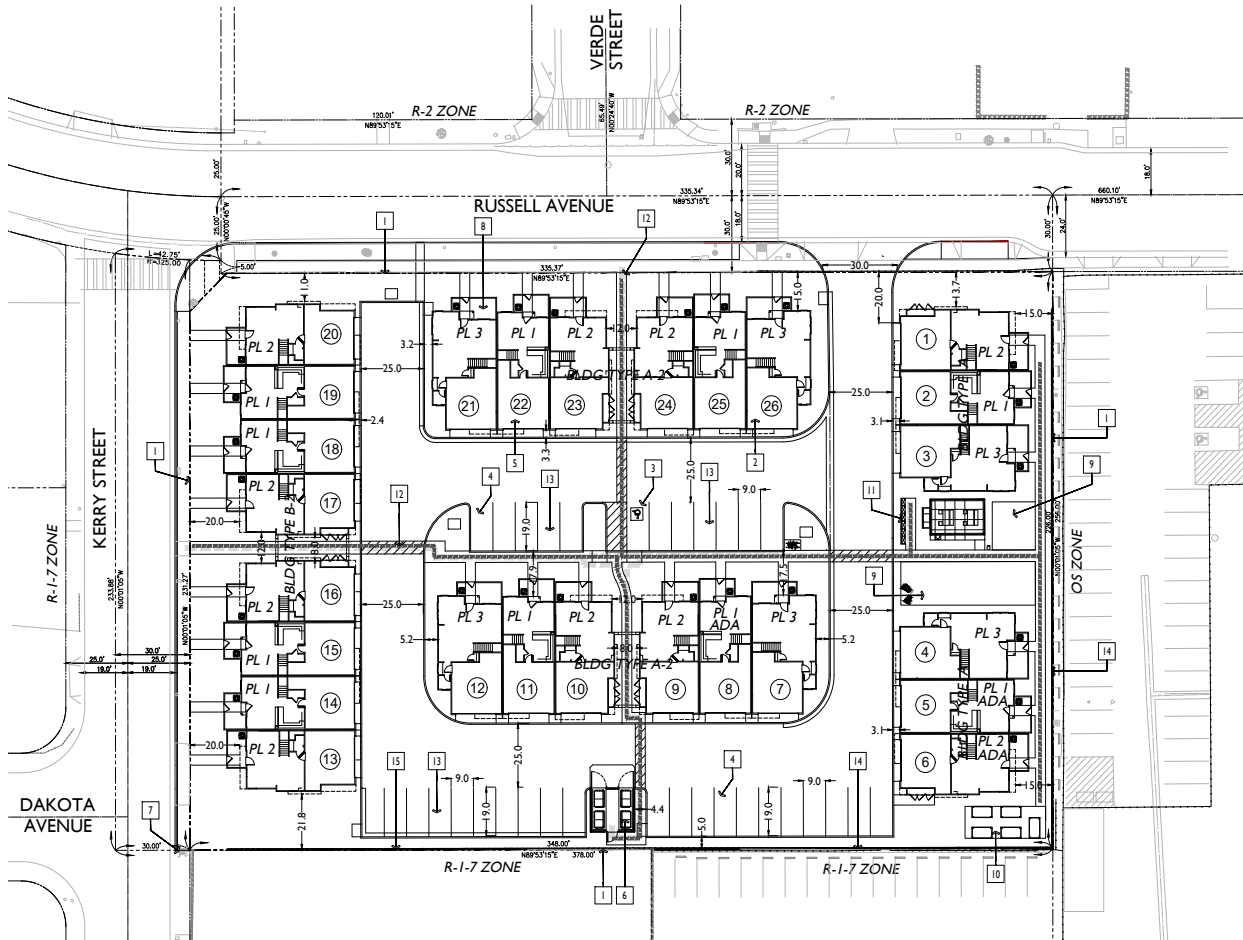
<sup>2</sup> VMT is calculated as Trips Generated\*Average Trip Length

## Summary

The Project was evaluated using the City of Garden Grove's TIA Guidelines to determine the need for a VMT analysis. The Project would replace existing VMT-generating uses and result in a net reduction of 58 daily trips and 446 VMT compared to existing conditions. Based on the Governor's Office of Planning and Research Technical Advisory, the Project would result in a less-than-significant VMT impact, and no additional VMT analysis is required.

If you have any questions about this analysis, please contact us at (949) 796-1180 or [techservices@epdsolutions.com](mailto:techservices@epdsolutions.com).

Figure 1: Proposed Project Site Plan



**PROJECT SUMMARY**

A.P.N. 098-081-119  
 EXISTING G.P. LOW DENSITY RESIDENTIAL (LDR)  
 EXISTING ZONE SINGLE FAMILY RESIDENTIAL (R-1-7)  
 EXISTING G.P. LOW MEDIUM DENSITY RESIDENTIAL (LMDR)  
 PROPOSED ZONE PLANNED UNIT DEVELOPMENT (PUD)

TOTAL UNITS 26 UNITS  
 SITE AREA 78,537 S.F. / 1.8 AC  
 DENSITY 14.4 DU/AC  
 LOT COVERAGE 43.2% (50% ALLOWED)  
 BUILDING HEIGHT 30'

**DWELLING UNIT SUMMARY**

PL	10	1,442 SF	3 BD	PRIV. YD.	111 SF.
PL 2	10	1,652 SF	3BD/LOFT-OPT-4BD		104 SF.
PL 3	6	1,800 SF	4 BD		136 SF.

**PARKING SUMMARY**

GARAGE STALLS (20' X 20', 2 CAR) 52 STALLS  
 GUEST STALLS (9' X 19') 33 STALLS  
 TOTAL PARKING PROVIDED 85 STALLS

3 & 4 BEDROOMS - 325 STALLS/UNIT REQUIRED  
 TOTAL PARKING REQUIRED 84.5 STALLS

**ELECTRIC VEHICLE CHARGING SUMMARY**

REQUIRED = 11 DWELLING UNIT = 26 EV GARAGE STALLS  
 TOWN-HOUSES W/ ATTACHED PRIVATE GARAGES SHALL COMPLY WITH 2025 CGSBC 4.106.4.1.

**LOT COVERAGE**

BLDG TYPE A FOOTPRINT = 3,239 S.F. X 2 = 6,478 S.F.  
 BLDG TYPE A-2 FOOTPRINT = 6,478 S.F. X 2 = 12,956 S.F.  
 BLDG TYPE B-2 FOOTPRINT = 8,364 S.F. X 1 = 8,364 S.F.  
 BUILDING COVERAGE = 27,798 S.F.  
 TRASH ENCLOSURE = 312 S.F.  
 OPEN PARKING STALLS = 5,795 S.F.  
 LOT COVERAGE = 33,905 S.F. / 78,537 S.F. = 0.432 OR 43.2%

**OPEN SPACE SUMMARY (SEE SHEET OS)**

COMMON AREA - ACTIVE 3,695 S.F. (142U)  
 PRIVATE YARDS EXCL. UNITS 13-20 2,106 S.F. (8' MIN. DIM)  
 PASSIVE OPEN AREA (5,802 S.F. X 50%) 2,901 S.F. (10' MIN. DIM)  
 TOTAL OPEN SPACE PROVIDED 8,702 S.F. (335 S.F./UNIT)

**ACCESSIBLE UNIT SUMMARY (MULTISTORY, PRIVATELY FUNDED)**

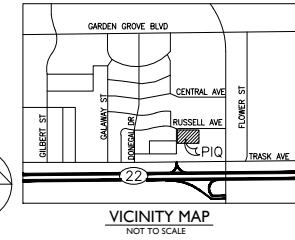
REQUIRED = 10% OF MULTISTORY DWELLINGS PER CBC 1102A.3.1  
 26 DU X 10% = 3 REQUIRED ACCESSIBLE UNIT  
 PROVIDED = 3 ACCESSIBLE UNITS (UNIT NOS. 5, 6 AND 8)

**BUILDING CODE SUMMARY**

CALIFORNIA RESIDENTIAL CODE (2025 CRC)  
 OCCUPANCY TYPE R3U  
 NUMBER OF STORIES 2  
 CONSTRUCTION TYPE V-B  
 FIRE SPRINKLERS NFPA 13D (CRC R313.1)

**KEYNOTES**

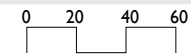
- PROPERTY LINE
- 2-STORY ROW TOWNHOME, TYP.
- ACCESSIBLE PARKING STALL - 9' X 19' (TYP.)
- VAN W/ 8' WIDE STRIPING (PASSENGER SIDE)
- STANDARD OPEN GUEST STALL - 9' X 19' (TYP.)
- 2-CAR GARAGE (9' X 20' MIN.)
- COVERED COMMUNITY TRASH ENCLOSURE
- PUBLIC FIRE HYDRANT
- PRIVATE PATIO, TYP.
- COMMON OPEN SPACE AREA
- COMMUNITY GARDEN AREA
- COMMUNITY MAILBOX LOCATION
- ADA PATH OF TRAVEL
- WATER QUALITY AREA (INFILTRATION CHAMBER) - SEE CIVIL PLANS
- NEW CONCRETE BLOCK WALL - REFER TO LANDSCAPE PLANS
- EXISTING CONCRETE BLOCK WALL TO BE REMOVED AND REPLACED



**GARDEN GROVE**  
 MELIA HOMES  
 9860 Irvine Center Dr  
 Irvine, CA 92618  
 (949) 759-4367

9822 RUSSELL - 2 STORY TOWNHOMES

SITE PLAN



JAN 12, 2026

**SUMMA**  
 ARCHITECTS  
 5256 S. Mission Road, Ste. 404  
 Bonsall, CA 92003  
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Figure 2: Low VMT Area Screening

