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WHERE EXPERIENCE AND PASSION MEET

To:	City of Orange
From:	Sina Salehipour, Mark Polunin, Chad Karns, EPD Solutions Inc.
Date:	9/29/2025
Site:	2375 North Tustin Street, Orange
Subject:	Level of Service (LOS) Screening Analysis - North Tustin Street Residential Project - EPD#25-032

This technical memorandum provides an evaluation of the development located at 2375 North Tustin Street (APN:372-642-31) (Project), in the City of Orange. The purpose of this analysis is to determine whether a level of service (LOS) analysis would be required for the proposed Project. This memo will evaluate the proposed Project using the City of Orange Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (LOS), July 2020.

Project Description

The existing site area is 4.235 gross acres and is fully developed and currently contains a vacant 45,676 square foot (SF) Best Buy retail store building, surface parking lot, and landscaping. The existing onsite improvements were constructed in 2007. The entire site is relatively flat and is accessible via the existing driveway to North Tustin Avenue. The proposed Project will demolish the existing structure and improvements on the Project site and then develop 71 paired and detached residences, open space/recreation, and parking. The residential structures would be three-stories in height and range in size from approximately 2,000 square foot three-bedroom units to 2,066 square foot four-bedroom units that would be developed above two-car garages for each of the units. The 71 residences on the 4.235-acre site would result in a density of 16.76 units per acre. The Project site plan is shown in Figure 1.

The Project site has a General Plan land use designation of General Commercial (GC) that allows a maximum Floor Area Ratio (FAR) of 1.0 and is zoned Limited Business Tustin Redevelopment Project Area (C-TR). The General Plan states that the GC land use designation provides for a wide range of retail and service commercial uses and professional offices. Regional shopping centers, mid- and high-rise office projects, corridor shopping districts, and neighborhood corner stores are all permitted uses. The Limited Business Tustin Redevelopment Project Area zoning designation is intended to provide for limited commercial uses for a wide variety of goods and services.

Project Trip Generation

The trip generation for the proposed Project was analyzed in accordance with the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021). For the existing land use, ITE Land Use Code 863 (Electronics Superstore) was applied to represent the former Best Buy store. Although no trip credit was applied for the existing use in the LOS screening analysis, it was included to illustrate the number of trips previously generated by the site when the Best Buy was operational. Table 1 presents the trip generation for the former Best Buy store. As shown in Table 1, the Best Buy store was estimated to generate 1,875 daily trips, 16 AM peak hour trips, and 194 PM peak hour trips.

The proposed 71 dwelling units (DU) were analyzed using ITE Land Use Code 215, Single-Family Attached Housing. Table 2 presents the trip generation for the proposed Project. As shown in Table 2, the proposed

Project is expected to generate a total of 511 daily trips, including 34 AM peak hour and 40 PM peak hour trips.

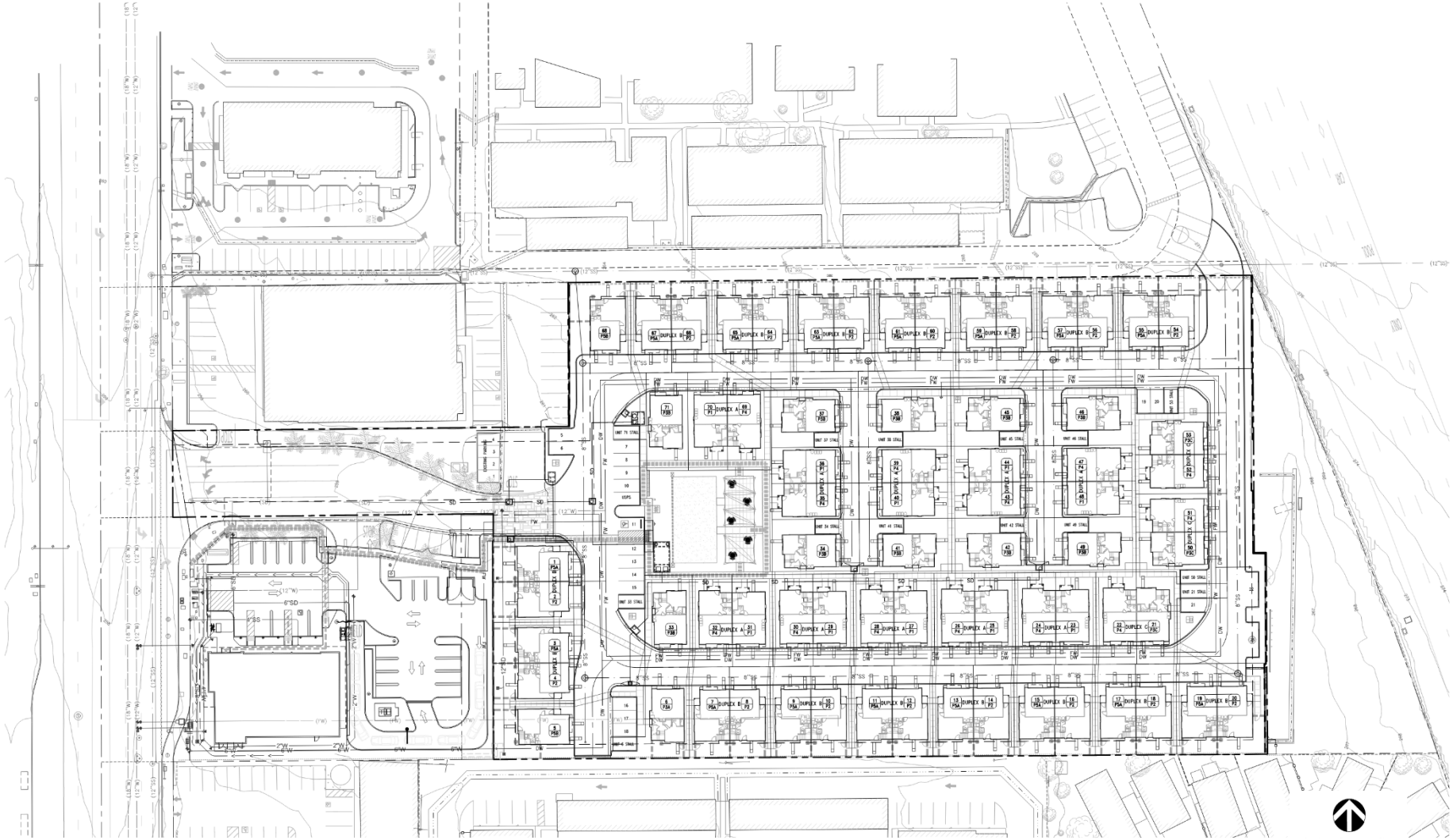
Level of Service (LOS) Screening

Based on City's guidelines outlined on page 4, an LOS analysis is required when the project generates more than 100 total peak hour vehicle trips during either the AM or PM peak hour. As shown in Table 2, the proposed Project would be expected to generate 34 AM peak hour trips and 40 PM peak hour trips. Therefore, per the City's TIA Guidelines, a full LOS analysis is not required for the proposed Project.

TIA Screening Results

The proposed Project was evaluated according to the City's TIA guidelines to determine if the Project would require an LOS analysis. The proposed Project is anticipated to generate 34 AM peak hour trips and 40 PM peak hour trips, which is below the 100 peak hour trips threshold. Therefore, a LOS analysis would not be required for the proposed Project.

Figure 1: Project Site Plan



Source: C & V Consulting

Table 1: Former Best Buy Store Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
863 Electronics Superstore[1]		1000 Sq. Ft. GFA	41.05	0.25	0.09	0.34	2.13	2.13	4.25
Project Trip Generation									
1 Vacant Ex-Best Buy[1]	45.676	1000 Sq. Ft. GFA	1875	12	4	16	97	97	194
Pass By (Daily 0%, AM 0%, PM 40%)			0	0	0	0	-39	-39	-78
Total Electronics Superstore Trip Generation			1875	12	4	16	58	58	116
Total Project Trip Generation			**1875**	**12**	**4**	**16**	**97**	**97**	**194**

[1]Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 863 - Electronics Superstore (Average Rate)

Table 2: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
215 Single-Family Attached Housing[1]		Dwelling Units	7.20	0.15	0.33	0.48	0.32	0.25	0.57
Project Trip Generation									
1 Single-Family Attached Housing[1]	71	Dwelling Units	511	11	23	34	23	17	40
Total Project Trip Generation			**511**	**11**	**23**	**34**	**23**	**17**	**40**

[1]Institute of Transportation Engineers, Trip Generation Manual, 11th Edition, 2021. Land Use Code 215 - Single-Family Attached Housing (Average Rate)