Section 3.12
Transportation

This section describes regulations related to transportation and circulation and the existing transportation systems in the project area, identifies significance criteria for impacts on transportation and circulation, and evaluates potential impacts associated with the proposed project. Discussion in this section is based on the project *Transportation Impact Study* (2020; Appendix O-1) and the *Vehicle Operations and Queuing Analysis* (2020; Appendix O-2) prepared by Chen Ryan. Additional information was obtained from the *City of Encinitas General Plan Circulation Element* (1991). Technical reports were peer reviewed by Michael Baker International and the City of Encinitas.

With implementation of Senate Bill 743, described below under *Regulatory Framework*, automobile delay, as measured by level of service, is not considered a significant effect on the environment. Therefore, in accordance with CEQA, the level of service analysis provided in Appendix O-2 is not addressed in this EIR. However, the analysis provided in Appendix O-2 will be considered by the City's decision-makers when making General Plan findings for the proposed project. These findings pertain to the proposed project's consistency with level of service policies provided in the General Plan's Circulation Element. Pursuant to CEQA, if this EIR is certified by the City's decision-makers, EIR findings pertaining to the level of service policies would not be made.

ENVIRONMENTAL SETTING

Access to the project site is provided from the regional transportation network via Interstate 5 (I-5), Leucadia Boulevard, El Camino Real, Saxony Street, Quail Gardens Drive, and Sidonia Street. Descriptions of these roadways are described below:

- *Interstate 5* - Within the project study area, I-5 is a north-south freeway located approximately 0.68 miles to the west of the project site. Access from I-5 to the study area is provided from the Leucadia Boulevard interchange.

- *Leucadia Boulevard* - In the vicinity of the project site, Leucadia Boulevard is a four-lane roadway with a raised median between Urania Avenue and Garden View Road; a five-lane roadway with a raised median between the I-5 northbound ramps and Urania Avenue; and a six-lane roadway with a raised median between Garden View Road and El Camino Real. The posted speed limit along the length of the roadway varies from 40 to 45 miles per hour (mph). On-street parking is prohibited and sidewalks are present on both sides of the roadway with exception of the segment between Quail Gardens Drive and Garden View Road where a paved path exists along the south side of the roadway.

Additionally, buffered bike lanes protected by plastic pylons were recently installed on Leucadia Boulevard east of I-5 to Quail Gardens Drive. East of Quail Gardens Drive, the pylons end and the bicycle facilities transition to Class II bicycle lanes until the intersection with El Camino Real. Leucadia Boulevard is classified in the City's General Plan as a Four-Lane Major Roadway - Augmented between I-5 northbound ramps and Town Center Place, and a Six-Lane Prime Arterial between Town Center Place and El Camino Real.

- *El Camino Real* - In the vicinity of the project site, El Camino Real is a six-lane roadway with a raised median and a posted speed limit of 45 miles per hour between Calle Barcelona and Town Center Drive. Sidewalks and Class II bicycle facilities are present along both sides of the roadway, and on-street parking is not permitted. According to the City's General Plan, El Camino Real is classified as a Six-Lane Prime Arterial - Augmented.

- *Saxony Street* - Saxony Street is a two-lane roadway with posted speed limits of 30 and 35 miles per hour. Sidewalks are present intermittently along both sides of the roadway; however, bicycle facilities are not present on either side. On-street parking is permitted along the roadway where residential uses front on to the street. The City's General Plan classifies the street as a Two-Lane Local Collector Roadway.

- *Quail Gardens Drive* - Quail Gardens Drive is a two-lane roadway with a raised median between Ranch Road and Leucadia Boulevard. Quail Gardens Drive has a posted speed limit of 35 miles per hour. On-street parking is not permitted. A dirt path exists along the east side of the roadway and sidewalk facilities are present along the west side. Class II bicycle facilities are present along both sides of the road. Quail Gardens Drive is classified in the City's General Plan as a Two-Lane Local Roadway - Augmented.

- *Sidonia Street* - In the project vicinity, Sidonia Street is a two-lane undivided roadway between Guildford Court and Leucadia Boulevard with a posted speed limit of 25 miles per hour. Sidewalk facilities are present along the west side of the roadway; no sidewalk is located along the east side along the project frontage; however, sidewalks on the east side of Sidonia Street are present north of the existing, unused driveway connecting the project site to Sidonia Street. On-street parking is permitted only along the west side of the roadway adjacent to the project, and expands to both sides of the roadway north of the unused driveway connecting the project site to Sidonia Street. Sidonia Street is not classified as a Circulation Element roadway in the City's General Plan.

Within the project vicinity, the North County Transit District (NCTD) Bus Route #304 is the only transit route that operates a bus stop within a half-mile of the project. The closest bus stop to the project site is located at the northwest and southeast corners of Leucadia Boulevard and Sidonia Street (adjacent to the project site). Bus Route #304 provides connection between the

Palomar College Transit Center and the Encinitas Transit Station, operating with 40-minute headways. There are no park-n-ride facilities within close proximity to the project site. The closest major transit station to the project site is the Encinitas Transit Station, located approximately 2.3 road miles to the southwest. The Transit Station provides access to NCTD's COASTER (commuter heavy rail) and NCTD Bus Routes 101, 304, and 309.

North Coast Highway 101 is located approximately 1.3 miles west of the project site and is heavily traveled by bicyclists. The road currently supports both Class II and Class III bicycle facilities. Other roads within the City that offer Class II bicycle facilities include Carlsbad Boulevard, Leucadia Boulevard, Quail Gardens Drive, Nardo Road, Garden View Road, Via Cantebria, El Camino Real, Rancho Santa Fe Road, Manchester Avenue, La Costa Avenue, Mountain Vista Drive, Encinitas Boulevard, and Santa Fe Drive.

The City's planned pedestrian circulation system consists of connecting sidewalks along roadways as well as recreational trails. Sidewalks are currently present along both sides of Leucadia Boulevard and Quail Gardens Drive and along the west side of Sidonia Street.

REGULATORY FRAMEWORK

Federal

Federal rules and regulations affect the City's traffic and circulation system (i.e., I-5) including transportation planning and programming; funding; and design, construction, and operation of facilities. The City complies with all applicable rules and regulations of the Federal Highway Administration, the Federal Transit Administration, the Federal Railroad Administration, the Federal Aviation Administration, and other federal agencies, as appropriate. In addition, the City coordinates with federal resource agencies where appropriate in the environmental clearance process for transportation facilities.

Congestion Management Process

Federal Highway Administration 23 Code of Federal Regulations 450.320 requires that all transportation management areas address congestion management through a process involving an analysis of multimodal metropolitan area-wide strategies that are developed to enhance safety and integrated management of new and existing transportation facilities eligible for federal funding. The San Diego Association of Governments (SANDAG) has been designated as having jurisdiction over transportation management areas in the San Diego region.

Regional

Regional Transportation Improvement Program 2018

SANDAG, acting as the MPO and the Regional Transportation Planning Agency (RTPA), is required to adopt a Regional Transportation Improvement Program (RTIP). Transportation projects funded with federal and state sources and the San Diego transportation sales tax program (TransNet) must be included in an approved RTIP. The programming of locally funded projects may be included at the discretion of the agency. SANDAG adopted the 2018 Regional/Federal Transportation Improvement Program (RTIP/FTIP) in September 2018.

The RTIP/FTIP represents a multibillion-dollar, five-year program of major transportation projects (such as proposed highway arterial, transit, and non-motorized projects) funded by federal and state sources, the local San Diego transportation sales tax (TransNet), and other local and private funding covering fiscal year (FY) 2018/2019 to FY 2022/2023.

The 2018 RTIP is a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation-related air pollution in support of efforts to attain federal and state air quality standards for the region. The 2018 RTIP also incrementally implements the 2050 Regional Transportation Plan (2050 RTP), the long-range transportation plan for the San Diego region, which was approved by the SANDAG Board of Directors in October 2011. The 2050 RTP is referred to as *San Diego Forward: The Regional Plan* (see discussion below).

2050 Regional Transportation Plan and Sustainable Communities Strategy

Regional Transportation Plans are developed to identify regional transportation goals, objectives, and strategies. Such plans are required to be prepared in conformance with the goals of Senate Bill (SB) 375 aimed at reducing regional GHG emissions from automobiles and light-duty trucks through changes in land use and transportation development patterns.

SANDAG serves as the Regional Transportation Agency for the Southern California region and is therefore required to adopt and submit an updated RTP to the California Transportation Commission and Caltrans every 4 to 5 years, based on regional air quality attainment status. Working with local governments, SANDAG is required by federal law to prepare and implement an RTP that identifies anticipated regional transportation system needs and prioritizes future transportation projects.

The 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) provides guidance for investing an estimated $208 billion in local, state, and federal transportation funds anticipated to be available within the San Diego region over the next three

decades. The 2050 RTP plans for a regional transportation system that enhances quality of life, promotes sustainability, and offers varied mobility options for both goods and people. The plan addresses improvements for transit, rail and bus service, express and managed lanes, highways, local streets, bicycling, and walking to achieve an integrated, multimodal transportation system by 2050. In accordance with the requirements of SB 375, the plan includes a Sustainable Communities Strategy that provides regional guidance for reduction of GHG emissions to state-mandated levels over upcoming years. The 2050 RTP/SSCS are components of *San Diego Forward: The Regional Plan*, adopted by SANDAG in 2019.

State

Senate Bill 375

Senate Bill (SB) 375 (codified in the Government Code and the Public Resources Code) took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established by Assembly Bill (AB) 32. SB 375 requires metropolitan planning organizations (MPO) to incorporate a Sustainable Communities Strategy in their Regional Transportation Plans to achieve GHG emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.

SB 375 required the California Air Resources Board (CARB) to set regional targets for reducing GHG from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region in California governed by an MPO. SANDAG is the MPO for the San Diego region. The SANDAG target, as set by CARB, is to reduce the region's per capita emissions of greenhouse gases from cars and light trucks by 7 percent by 2020, compared with a 2005 baseline. By 2035, the target is a 13 percent per capita reduction. SB 375 does not require CARB to set targets beyond 2035. Nevertheless, the Regional Plan also includes a 2050 time horizon to integrate the TransNet Program, which has a 2048 time horizon (very close to 2050).

Senate Bill 743

SB 743 was signed into law September 2013 and includes several changes to CEQA for projects located in areas served by transit (e.g., transit-oriented development, or TOD). Most notably with regard to transportation and traffic assessments, SB 743 changes the way that transportation impacts are analyzed under CEQA (see Public Resources Code Section 21099). SB 743 required the Governor's Office of Planning and Research to amend the CEQA Guidelines to exclude level of service (LOS) and auto delay when evaluating transportation impacts.

With implementation of SB 743, new criteria have been established to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses (OPR 2014). The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Guidelines) provided recommendations for updating the state's CEQA Guidelines in response to SB 743 and contained recommendations for a vehicle miles traveled (VMT) analysis methodology in an accompanying Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory).

The Guidelines, including the Technical Advisory, recommended use of automobile VMT per capita as the preferred CEQA transportation metric, along with the elimination of automobile delay/LOS for CEQA purposes statewide. Public Resources Code Section 21099 and CEQA Guideline Section 15064.3 reflect this change. Under Section 21099, automobile delay, as measured by level of service or similar measures of traffic congestion or vehicular capacity, is not considered a significant effect on the environment.

Local

City of Encinitas General Plan

The City's General Plan is the primary source of long-range planning and policy direction used to guide growth and preserve the quality of life within Encinitas. The General Plan states that a goal of the City is to analyze proposed land uses to ensure that the designations would contribute to a proper balance of land uses within the community. The relevant goals and policies for the project include:

Circulation Element

GOAL 1:	**Encinitas should have a transportation system that is safe, convenient and efficient, and sensitive to and compatible with surrounding community character.**
Policy 1.2:	Endeavor to maintain Level of Service C as a basic design guideline for the local system of roadways understanding that the guideline may not be attainable in all cases.
Policy 1.3:	Prohibit development which results in Level of Service E or F at any intersection unless no alternatives exist and an overriding public need can be demonstrated.
Policy 1.10:	Encourage the design of roads and traffic controls to optimize safe traffic flow by minimizing turning, curb parking, uncontrolled access, and frequent stops.

Policy 1.15: The City will actively support an integrated transportation program that encourages and provides for mass transit, bicycle transportation, pedestrians, equestrians, and carpooling.

Policy 1.17: Standards shall be established and implemented to provide for adequate levels of street lighting, based on criteria of safety and related to volumes of vehicular, pedestrian and bicycle activity and potential points of conflict. Such standards shall be designed to respect different community and neighborhood needs for lighting, different community standards for design and special attention given to preservation of dark sky.

GOAL 2: The City will make every effort to develop a varied transportation system that is capable of serving both the existing population and future residents while preserving community values and character.

Policy 2.2: Require new residential development to have roadways constructed to City standards before the roads can be dedicated to the City.

Policy 2.10: Establish landscaping buffer and building setback requirements along all roads which are local augmented status or larger, except where inappropriate.

GOAL 7: Every effort will be made to have new development, both in the City and in the region, provide for all costs of the incremental expansion of the circulation system necessary to accommodate that development. Costs include, but are not limited to, costs of right-of-way and construction, including costs of moving utilities and structures, and costs for landscaping and intersection improvement.

Although Policies 1.2 and 1.3 are relevant for planning purposes, these level of service policies rely on measurements used for evaluating automobile delay. Therefore, pursuant to CEQA, these policies are not applicable to the environmental impact analysis in this EIR.

City of Encinitas Bikeway Master Plan

The City includes bicycle facilities along Highway 101 and several major roadways. The North Coast Highway 101 corridor is a highly traveled bicycle corridor through the City of Encinitas and regionally within San Diego County and supports both Class II and Class III bike facilities. Class II bicycle facilities are currently provided along Carlsbad Boulevard, Leucadia Boulevard, Quail Gardens Drive, Nardo Road, Garden View Road, Via Cantebria, El Camino Real, Rancho Santa Fe

Road, Manchester Avenue, La Costa Avenue, Mountain Vista Drive, Encinitas Boulevard, and Santa Fe Drive.

Let's Move Encinitas Pedestrian Travel & Safe Routes to School Plan

The City adopted its *Let's Move Encinitas Pedestrian Travel & Safe Routes to School Plan* in March 2015 to address the need for pedestrian travel within the urbanized areas of the City as well as the more rural areas, to plan for safe routes to school, and to provide pedestrian access to the coastal zone. The plan identifies potential improvement locations based on the need for pedestrian facilities and known pedestrian safety issues.

City of Encinitas Active Transportation Plan Administrative Draft April 2018

The City of Encinitas Active Transportation Plan is intended to address not only local travel needs, but crosstown and regional bicycle and pedestrian travel as well. This plan is intended to be responsive to General Plan changes and to bring the document into conformance with the City's latest Climate Action Plan, complete streets policies, and other local goals and objectives. Objectives identified include establishing biking and walking facility types and identifying connections between the City's bikeway system and the regional system.

The document evaluates the City's existing bikeway facility system and its relationship with other systems, including public transit, and recommends access to transit improvements where appropriate. The plan aims to maximize the efficiencies offered by multi-modal connections between public transit, walkways and bikeway, including providing more convenient walking and bicycling facilities for residents who do not have ready access to motor vehicles, as well as encouraging those with access to motor vehicles to consider biking or walking as viable alternatives to driving.

Encinitas City Council Ordinance 2019-24

Ordinance 2019-24 amended both Title 24 and Title 30 of the Encinitas Municipal Code to provide consistent language for the requirements of Pedestrian and Bicycle Connectivity. Connectivity and circulation between adjacent land uses is reviewed on a project-by-project basis with the objective of maintaining and/or enhancing further connectivity and circulation of pedestrian, bicycle and vehicular transport. Furthermore, the amended Municipal Code is applied to all areas and zones within the City; including when a subdivision is or is not requested as a part of a development application.

IMPACT ANALYSIS AND MITIGATION MEASURES

Methodology

The following provides a summary of the methodology used in this analysis. Additional background information and an in-depth discussion as to the technical approach is provided in Appendix O-1 of this EIR.

Screening Criteria

Guidance provided by the Institute of Transportation Engineers (ITE) recognizes that small land use projects, which fall below certain screening thresholds, would not have a significant effect on VMT. Projects that are below these thresholds are presumed to be less than significant. Different levels of analysis are therefore recommended by ITE based on the number of average daily trips (ADT) generated by a land use project.

According to ITE's Regional Guidelines for Transportation Impact Studies in the San Diego Region (Regional TIS Guidelines), any project that generates fewer than 1,000 ADT if consistent with a City's General Plan, or 500 ADT if inconsistent with a City's General Plan, is not required to conduct a VMT analysis.

Under the ITE Regional TIS Guidelines, projects that generate greater than the minimum allowable ADT threshold (500 ADT or 1,000 ADT), but fewer than 2,400 ADT are required to conduct a VMT analysis using the VMT calculation tool generated by SANDAG. Projects that generate greater than 2,400 ADT are required to conduct a VMT analysis using the SANDAG Regional Model, regardless of whether or not the project is consistent with the General Plan; refer to Appendix O-1 for additional discussion.

Analysis Metrics

For land use development projects, the Regional TIS Guidelines require the following metrics be analyzed to determine if a project would result in a significant transportation-related impact:

- *VMT/Capita:* Includes all vehicle-based person trips grouped and summed to the home location of individuals who are drivers or passengers on each trip. This metric includes both home-based and non-homebased trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT/Capita.

- *VMT/Employee:* Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The

VMT for each work location is then summed for all work locations in a particular census tract and then divided by the total number of employees of that census tract to determine the VMT/Employee.

The CEQA Guidelines specify automobile VMT as the most appropriate CEQA transportation metric, along with the elimination of automobile delay/LOS. However, lead agencies have the discretion to select their preferred significance thresholds with respect to what level of VMT increase would cause a significant environmental impact. Lead agencies have the opportunity to choose the thresholds suggested in OPR's Technical Advisory or develop alternative thresholds. The analysis can be conducted by comparing either: 1) the project VMT/capita, or 2) the project VMT/employee to both (1) the San Diego regional average or (2) the average for the city or community in which the project is located.

Per the Regional TIS Guidelines, if the project average is lower than either 85% of the regional average or 85% of the average for the city or community in which the project is located, the VMT impacts of the project can be presumed less than significant. For purposes of this analysis, the VMT Assessment for the proposed project was analyzed against the following VMT thresholds to cover the following geographical areas:

- Average VMT/Capita for the region
- Average VMT/Capita for the City of Encinitas

For residential and employment-based land use developments, a project is considered to have a less than significant transportation related impact if the project VMT/Capita and VMT/Employee is lower than 85% of the regional average or 85% of the average for the area in which the project is located. The significance thresholds are shown in Table 3.12-1.

Table 3.12-1 Significance Thresholds

Land Use	Metric	Average VMT in Miles[a]	Threshold[b]
San Diego Region			
Residential	VMT/Capita	16.4	13.9
Commercial	VMT/Employee	24.9	21.2
City of Encinitas			
Residential	VMT/Capita	18.9	16.1
Commercial	VMT/Employee	27.4	23.3

Notes:
a. Base Year Average (RTIP Year Average)
b. Regional TIS Guidelines recommends threshold is compared against 85% of the Base Year (2012) area average. Regional TIS Guidelines recommends threshold is compared against 85% of the RTIP Year (2020) area average.
Significant impact occurs if the project VMT/Capita or VMT/Employee is over the threshold.
Base Year Area Average (RTIP Year Area Average)
Source: Chen Ryan, 2020 (Appendix O-1)

Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to transportation if it would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

PROJECT IMPACTS AND MITIGATION

CONFLICT WITH AN APPLICABLE PROGRAM, PLAN, ORDINANCE OR POLICY

Impact 3.12-1	**The project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.**

Access to the site would be provided at approximately the existing access point along Quail Gardens Drive. Minor improvements would be made to the entry drive to provide two lanes (one in and one out). Sidonia Street would be widened and improved to meet the City's standards for a local residential street. It is anticipated that the access point at Sidonia Street would remain as a gated emergency access only (no vehicular access for residents); however, the option for Sidonia Street to serve a secondary access road is also evaluated in this EIR.

Although the VMT methodology is now applied in evaluating potential transportation impacts of a project, the City's General Plan identifies standards for maintaining an adequate LOS for City streets and intersections. To evaluate project consistency with the General Plan Circulation Element, a Vehicle Operations and Queuing Analysis was prepared for the project (Chen Ryan 2020); refer to Appendix O-2 for additional discussion. As previously stated, to be consistent with the 2020 CEQA Guidelines, LOS analysis is not required for purposes of this EIR's impact analysis. However, the LOS analysis provided in Appendix O-2 will be considered by the City's decision-makers when making General Plan findings for the project.

The proposed project does not propose any features that are inconsistent with applicable policies of the City's Circulation Element. It should be noted that the proposed project land uses are consistent with those assumed in the City's HEU.

Additionally, the proposed project would be subject to payment of the City's Transportation Fees. No conflict with an applicable program, plan, ordinance, or policy addressing the circulation system would occur with regard to roadways or intersections affected by the proposed project; refer also to Appendix O-2.

The proposed project has been designed to provide access to alternative means of transportation and to encourage residents and visitors to the project site to utilize such modes of travel. As noted above, NCTD Bus Route #304 operates a bus stop located at the northwest and southeast corners of Leucadia Boulevard and Sidonia Street. Bus Route #304 provides connection between the Palomar College Transit Center and the Encinitas Transit Station, thereby allowing for regional connections.

The closest major transit station to the project site is the Encinitas Transit Station, located approximately 2.3 road miles to the southwest. The Transit Station also provides access to NCTD's COASTER (commuter heavy rail) and NCTD Bus Routes 101, 304, and 309.Therefore, residents of the proposed project would have access to both the local and regional transit systems. No changes to the existing bus stop are proposed with the project.

Further, the proposed project would provide connections to existing pedestrian facilities along Leucadia Boulevard and Quail Garden Drive, thereby allowing for access to the existing off-site circulation system. Sidonia Street would be widened and improved to meet the City's standards for a local residential street which would include construction of a sidewalk along the project's frontage with Sidonia Street, consistent with the City's Street Design Manual. This sidewalk would connect to an existing sidewalk on Leucadia Boulevard. Other on-site amenities such as the linear park, on-site trails, edible paseo, and other pedestrian paths are also proposed.

Bike lanes are present along both sides of Leucadia Boulevard and Quail Gardens Drive in the project vicinity. Project implementation would not interfere with the continued use of such bike lanes, with the exception of possible temporary interruption (i.e., relocation) of the southbound bike lane during project improvements at the Quail Gardens Drive entrance. Additionally, bike parking would be provided on-site to encourage residents and visitors to the site to bike instead of driving an automobile, and an electric bicycle (e-bike) share program would be implemented in the community for project residents consisting of 10 electric bikes that would be made available for residents to use.

As such, the proposed project would be in conformance with adopted policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities and would not otherwise

decrease the performance or safety of such facilities. The project would not result in a conflict with the City's General Plan supporting alternative transportation modes. Overall, impacts would be **less than significant**.

Mitigation Measures: None required.

Level of Significance: Less than significant.

CONFLICT WITH CEQA GUIDELINES SECTION 15064.3(B)

Impact 3.12-2 **The project would conflict and be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be significant and unavoidable.**

The VMT calculations for the proposed project were compared to thresholds identified in Table 3.12-1.

The method used to derive and evaluate project VMT is determined based on a project's trip generation. Trip generation rates for the project were developed utilizing SANDAG's *(Not So) Brief Guide to Vehicular Trip Generation* (SANDAG 2002). Table 3.12-2 gives daily project trip generation for the project.

Table 3.12-2 Project Trip Generation

Land Use	Units	Trip Rate	Average Daily Traffic (ADT)
Existing Land Uses			
Flower Mart[1]	18 acres	Driveway Count	-334
Proposed Land Uses			
Apartment	197 DU	6/DU	1,182
Condominiums	53 DU	8/DU	424
Restaurant	3,500 SF	100 KSF	350
Open Space	5.5 acres	2/acre	11
Farm Stand	1,232 SF[2]	40/KSF[3]	50
Nursery[4]	0.07 acres	90/acre	7
		Subtotal	**2,024**
		Total	**1,690**

Source: SANDAG (not so) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002
Notes:
1. Based on driveway counts collected on a midweek day in October 2019.
2. This is net square feet from the 3,213 gross square feet for farm stand.
3. Garden nursery rate, which is also consistent with specialty retail/commercial retail trip generation.
4. Based on the project components in the first project submittal to the City as well as in the project's NOP, a nursery was included in the project trip generation analysis in the Vehicle Operations and Queuing Analysis (Appendix O-2). Although a nursery is no longer proposed as part of the project, the ADT from this use (7 ADT) is included in the analysis in this EIR to be conservative and to over-estimate total trip generation.
DU = dwelling units; SF = square feet; KSF = thousand square feet

As shown, the proposed project would generate 2,024 ADT. Implementation of the proposed project would also replace the existing 334 daily trips associated with the existing agricultural operations, and therefore, the proposed project's net increase is 1,690 ADT.

The proposed project is consistent with the Encinitas General Plan. However, based on the Regional TIS Guidelines, the proposed project does not fall below the ADT screening threshold of 1,000 ADT as discussed above under *Methodology*; therefore, a VMT/Capita and VMT/Employee analysis has been conducted using the SANDAG Series 13 Travel Demand Model.

To calculate the average VMT/Capita and VMT/Employee generated by the proposed project, the project's land uses outlined in Table 3.12-2 were incorporated into the SANDAG Series 13 Travel Demand Models for the Base Year (2012) and RTIP Year (2020). A Select Zone assignment was conducted for the project Transportation Analysis Zone (TAZ) which tracked and calculated the project VMT by user type. The results of the Select Zone assignment are provided in Table 3.12-3. Model output results are presented in Appendix C of Appendix O-1.

The proposed residential uses are anticipated to generate a VMT/Capita of 18.7 miles during the RTIP Year (2020), which exceeds the 85% significance threshold. For the commercial uses, the proposed project's restaurant uses are anticipated to generate a VMT/Capita of 27.6 miles during the RTIP Year (2020), which exceeds the 85% significance threshold for all area averages. Therefore, the project would have a potentially significant VMT related transportation impact.

The proposed project's VMT/Capita and VMT/Employee are not anticipated to fall under the significance threshold as the project site is located in a suburban area that includes single-family homes with higher automobile ownership as compared to the region. While the proposed project is located on an infill site, would contain a mix of uses on-site, includes a suite of project design features to enhance sustainability, would provide for a variety of housing types including "very low" income affordable housing, and is consistent with City's General Plan, Local Coastal Program, Encinitas Ranch Specific Plan, Climate Action Plan, and SANDAG's The Regional Plan, impacts related to VMT/capita and VMT/employee would not be reduced to 85% of the regional average. It is noted this impact is primarily a result of the geographic location of the proposed project in a suburban neighborhood, as trip characteristics of the surrounding residential land uses are used as a surrogate to estimate proposed project trip characteristics, regardless of the inherent differences between the land uses (described above). Therefore, VMT may be overestimated for the project, as the model assumes travel patterns reflective of the surrounding single-family neighborhoods.

Table 3.12-3 VMT Results Impact Analysis

Metric	Proposed Project	Region Average	Project % of Region Average	Significant Impact?[1]	Encinitas Average	Project % of Encinitas	Significant Impact?
VMT/Capita	21.1	17.6	119.9	Yes	20.8	101.4	Yes
VMT/Employee	28.8	25.9	111.2	Yes	29.2	98.6	Yes
VMT/Capita	18.7	16.4	114.0	Yes	18.9	98.9	Yes
VMT/Employee	27.6	24.9	110.8	Yes	27.4	100.7	Yes

1. Significant impact if greater than 85%.
Source: Chen Ryan, 2020 (Appendix O-1).

Additionally, it is worth noting the limitations of the SANDAG model and its inability to capture project features that could reduce the proposed project's VMT (as specified in Table 3.2). SANDAG's Travel Demand Model is built at the regional level, making it limited to capture all the nuances of individual project sites, such as benefits of small mixed uses, affordable housing components, or the proposed travel demand management measures that will be provided by the proposed project.

Nonetheless, the proposed project would have a potentially significant VMT-related transportation impact. To reduce the VMT/Capita and VMT/Employee associated with the proposed project to a less than significant level, VMT reducing measures would need to be implemented. Accordingly, a Transportation Demand Management (TDM) analysis was conducted using the California Air Pollution Control Officers Associates (CAPCOA) resource document "Quantifying Greenhouse Gas Mitigation Measures," August 2010 (CAPCOA Report) to identify the type and magnitude of TDM features the project would need to implement to reduce project VMT to less than significant levels. To quantify the potential reduction in project-generated VMT, the VMT based reduction strategies were applied to the relevant features contained in the proposed project's design and TDM plan. Refer to Appendix D of Appendix O-1 for the CAPCOA Fact Sheets used in this evaluation.

Implementation of the TDM plan is aimed at vehicle trip reduction, increased use of alternative travel modes, and better traffic management in the vicinity of the project area. The TDM program is organized in the following three strategy types: Land Use Strategies, Neighborhood/Site Enhancements, and Commute Trip Reduction Strategies. The majority of the measures are included in the proposed project (refer to Chapter 2.0, Project Description) while enforceable additive measures are listed under mitigation measure **TR-1** at the end of this threshold discussion. TDM measures proposed for the project include:

Land Use Strategies

- "Mix of Uses" - The project provides a mix of land uses, including residential, commercial and recreational uses, so that residents of the proposed project have access to basic amenities without having to travel outside of the project site. This proximity would lower vehicle miles traveled because residents can use non-automobile transportation modes to reach the various uses available within the site.

- "Affordable Housing" - The project provides 40 very-low income affordable housing units, which provide greater opportunity for lower income families to live closer to jobs centers and achieve jobs/housing match near transit and allow a greater number of families to be accommodated within a given building footprint.

Travel and Commute Services for Residents and Employees

Neighborhood/Site Enhancements

- "Pedestrian Connections" - The project would develop a pedestrian network that provides accommodations on-site as well as convenient pedestrian access to Leucadia Boulevard and Quail Gardens Drive.

- "Multi-use Trail" - The project Conceptual Site Plan includes a multi-use path that loops the site. Multi-use trails and paths comprise a total of nearly two miles within the site. The multi-use trails and paths shall be constructed in conformance with that shown on the approved final Conceptual Site Plan.

Commute Trip Reduction Strategies

- "Business Center" - The project would include a resident business center in the community recreation center with Wi-Fi access for residents, printers/scanners, and other office amenities to enable residents to work remotely rather than commuting to work.

- "TDM Marketing Program"

    - Promote and advertise various transportation options, including promoting information and resources regarding SANDAG's iCommute program, which provides support to commuters through a variety of TDM measures, such as carpool matching services, vanpool, and other services.

    - Promote formal and/or informal networks among residents for carpool/ vanpool purposes.

- Promote available websites providing transportation options for residents.
- Create and distribute a "new resident" information packet addressing alternative modes of transportation.

- "School Pool" - The project would coordinate and implement a "school pool" program for project students**.**

Appendix O-1 provides a detailed analysis of the calculated VMT reductions achieved for each of the strategies. When determining the overall VMT reduction associated with the proposed project, the VMT reduction for each individual strategy requires adjustment to reflect the condition that some of the strategies may be redundant or applicable to the same populations. Consequently, the total VMT reduction that would be associated with the TDM measures would be 4.1% for employment related VMT attributable to transit pass subsidies, and 1.0% for residential related VMT (even though the total summation of the VMT reductions for residential-related TDM measures is greater than 1.0%). Table 3.12-4 summarizes the reduction percentages needed to reduce the project's VMT/Capita and its VMT/Employee impacts to less-than-significant levels.

Table 3.12-4 VMT Percentage Reduction Requirements by Geographic Area

Metric	Project TDM VMT Reduction	Region Average		City of Encinitas	
		% Reduction to Mitigate	Mitigated?	% Reduction to Mitigate	Mitigated?
VMT/ Capita	1.0%	40.7	No	19.2	No
VMT/ Employee	4.1%	30.9	No	16.1	No
VMT/ Capita	1.0%	34.5	No	16.1	No
VMT/ Employee	4.1%	30.9	No	18.5	No

Source: Chen Ryan, 2020 (Appendix O-1).

As shown, implementation of the proposed TDM measures would not reduce project related impacts levels below the established thresholds and transportation impacts relative to VMT would remain **significant and unavoidable**.

Mitigation Measures:

TR-1: The following Transportation Demand Measures (TDMs) shall be implemented to further reduce potential effects relative to vehicle miles traveled.

- "E-Bike Share" - The project shall implement an electric bike share program to link to local Encinitas destinations and reduce motorized vehicle trips. The electric bike share program would provide for the availability of 10

electric bikes for the exclusive use of project residents to provide sustainable transportation as a substitute for individual vehicle ownership/use. In addition to the E-Bike program, high quality bike parking would be provided for project residents.

- "Car share dedicated parking" - Two parking spaces west of the community recreation center shall be dedicated to accommodate car sharing opportunities.
- "Transit Passes Subsidies" - NCTD Regional Transit passes shall be offered to the 20 on-site employees as an alternative to parking at the project site.

Level of Significance: Significant and unavoidable. While the proposed project is located on an infill site, would contain a mix of uses on-site, includes a suite of project design features to enhance sustainability, would provide for a variety of housing types including "very low" income affordable housing, and is consistent with City's General Plan, Local Coastal Program, Encinitas Ranch Specific Plan, Climate Action Plan, and SANDAG's The Regional Plan, impacts related to VMT/capita and VMT/employee would not be reduced to 85% of the regional average, even after implementation of mitigation measure **TR-1**.

DESIGN FEATURES

Impact 3.12-3	**The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.**

Increase Hazards

As stated in Impact 3.12-1, minor improvements would be required to ensure adequate access to the project site along Quail Gardens Drive. Sidonia Street would be widened and improved to meet City standards for a local residential street, even though the proposed project would only provide for emergency access through a gate on Sidonia Street. Therefore, the project does not propose any roadway improvements that would result in sharp curves or dangerous intersections either on-site or off-site.

The site would be improved with high visibility driveway ingress and egress along Quail Gardens Drive (and Sidonia Drive if the option for secondary access is implemented). In conformance with City standards, the applicant would be required to prepare a traffic control plan to ensure that adequate circulation is maintained during construction and that no hazardous conditions result from such activities.

Based on comments received during the public scoping meeting, an evaluation of the potential for the project to increase hazards at the Sidonia Street/Leucadia Boulevard and Leucadia Boulevard/Quail Gardens Street intersections was prepared. Traffic collision data was collected for the intersections of Leucadia Boulevard/Sidonia Street and Leucadia Boulevard/Quail Gardens Street for the years 2006 to 2020. A total of 24 collisions were reported at the Leucadia Boulevard/Sidonia Street intersection between 2006 and 2020, with the greatest number of accidents occurring in 2018 with 6 reported collisions. The majority of these collisions were vehicle related, with the primary collision factor being vehicles traveling at unsafe speeds (Chen Ryan 2020; Appendix O-2).

The Leucadia Boulevard/Quail Gardens Drive intersection experienced a total of 41 collisions reported between 2010 and 2020. The greatest number of collisions occurred in 2012 with 7 reported collisions. The primary collision factor of the reported collisions at this intersection was vehicles traveling at unsafe speeds. All collisions involved a vehicle, and one collision involved a pedestrian (Chen Ryan 2020; Appendix O-2). The data suggests that the hazardous condition is an existing condition caused by excessive speeds. This condition would not be degraded by improvements constructed by the proposed project because no off-site improvements are required at either intersection. Further, the City of Encinitas is currently preparing plans to improve the Quail Gardens Drive/Leucadia intersection.

For the Leucadia Boulevard/Quail Gardens Drive intersection under existing conditions, an estimated 545 vehicle trips exit Quail Gardens Drive onto Leucadia Boulevard in the AM peak hour and 354 exit during the PM peak hour. An estimated 90 trips enter Quail Gardens Drive from Leucadia Boulevard in the AM peak hour and 139 enter Quail Gardens Drive during the PM peak hour (refer to Figure 4.2 of Appendix O-2).

For the Leucadia Boulevard/Quail Gardens Drive intersection under existing plus project conditions, an estimated 638 vehicle trips exit Quail Gardens Drive onto Leucadia Boulevard in the AM peak hour and 385 exit during the PM peak hour. An estimated 102 trips enter Quail Gardens Drive from Leucadia Boulevard in the AM peak hour and 254 enter Quail Gardens Drive during the PM peak hour (refer to Figure 4.2 of Appendix O-2). While the proposed project would increase the number of daily turn movements at this intersection, it would not construct or otherwise result in physical alteration of the intersection that would contribute to a substandard design.

Additionally, a queueing analysis was conducted for the project's single driveway and the movements on the Quail Gardens Drive/Leucadia Boulevard intersection to determine if extensive queues would form on the two roadways that would in turn affect project driveway operations. The analysis determined that the southbound left-turn pocket at the Quail Gardens Drive and Leucadia Boulevard intersection queue exceeds the pocket length by one vehicle

length. To accommodate the anticipated full length of the southbound left-turn queue, the existing median could be reconstructed to lengthen the southbound left-turn storage pocket at Leucadia Boulevard and shorten the northbound left-turn pocket at the project driveway since there is sufficient storage to serve the project trips. Such improvements would not impede traffic at the driveways or on the adjacent roadway system. Additionally, this queue spillback is not anticipated to substantially affect traffic on Quail Gardens Drive as it only extends beyond the pocket by one vehicle during the busiest time of the peak hour (refer to Appendix O-2). Therefore, improvements are not recommended as the impacts would be less than significant.

Sidonia Secondary Access Option

The access point at Sidonia Street is proposed as gated emergency access only (no vehicular access for residents), consistent with community feedback received during the NOP scoping period and associated conversations with City staff.

Based on input from City staff, an "option" to retain full secondary access to Sidonia Street has been analyzed in this EIR (described throughout this EIR as the "Sidonia Secondary Access Option"). Analysis and findings herein encompass both access options unless specifically noted. Refer to Appendix O-2 for information on LOS effects on area roadways and intersections under this scenario.

The Leucadia Boulevard/Sidonia Street intersection was analyzed to determine if the selection and implementation of the Sidonia Secondary Access Option would increase the potential for hazards at the intersection. Under existing conditions, an estimated 29 vehicle trips exit Sidonia Street onto Leucadia Boulevard in the AM peak hour and 24 exit during the PM peak hour. An estimated 20 trips enter Sidonia Street from Leucadia Boulevard in the AM peak hour and 50 enter Sidonia Street during the PM peak hour (refer to Figure 4.2 of Appendix O-2).

For the Leucadia Boulevard/Sidonia Street intersection under existing plus project conditions, an estimated 29 vehicle trips exit Sidonia Street onto Leucadia Boulevard in the AM peak hour and 24 exit during the PM peak hour. An estimated 20 trips enter Sidonia Street from Leucadia Boulevard in the AM peak hour and 50 entering Sidonia Street during the PM peak hour (refer to Figure 4.3 of Appendix O-2). Therefore, because the proposed project would not increase the number of turn movements at this intersection, impacts would be less than significant.

Incompatible Uses

The proposed project also includes a 5.4-acre organic farm on the northern portion of the property. Farm operations would require the use of a tractor for occasional soil preparation and hauling of agricultural goods. The equipment would be used intermittently and would not be expected to substantially increase hazards due to an incompatible use (e.g., farm operations). The nearest

sensitive use (residential) would be located over approximately 190 feet to the west of the western edge of the proposed on-site farm area; refer to Figure 2.0-5, Conceptual Site Plan. Therefore, on-site operation of farm equipment would not result in an adverse effect with regard to design hazards.

The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be **less than significant**.

Mitigation Measures: None required.

Level of Significance: Less than significant.

EMERGENCY ACCESS

Impact 3.12-4 **The project would not result in inadequate emergency access. Impacts would be less than significant.**

As indicated above, access to the project site would occur from Quail Gardens Drive, with the potential option for secondary access to be provided off of Sidonia Drive. The access point at Sidonia Street is proposed as a gated emergency access only (no vehicular access for residents), consistent with community feedback received during the NOP scoping period. The City of Encinitas Fire Department has indicated that the provision of a Knox box at the gate on Sidonia Street would ensure sufficient secondary access in case of emergency response. However, the option to retain full secondary access to Sidonia Street is also analyzed in this EIR for consideration by the City's decision-makers and would similarly provide for secondary access acceptable to the Encinitas Fire Department.

Interior circulation is proposed via a two-lane, 26-foot-wide roadway system that would connect east-west through the site. An internal fire access loop road and series of private alleys would provide vehicular access to all residential units; refer to Figure 2.0-5, Conceptual Site Plan.

All project roadway and access improvements have been designed in conformance with City engineering and fire department standards for emergency access and circulation. The proposed project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. A traffic control plan would be prepared to ensure that adequate access and circulation is maintained on all surrounding streets during the project construction phase. The project would not result in inadequate emergency access. Impacts would be **less than significant**.

Mitigation Measures: None required.

Level of Significance: Less than significant.

CUMULATIVE IMPACTS

Impact 3.12-5 **The project would result in a significant cumulative impact related to transportation. Impacts would be cumulatively considerable.**

Geographic Scope

Cumulative projects that would have the potential to be considered in a cumulative context with the project's incremental contribution, and that are included in the analysis of cumulative impacts relative to transportation, are identified in Table 3.0-1 and Figure 3.0-1 in Section 3.0 of this EIR. Additionally, to be conservative, the cumulative analysis includes all 2019 HEU sites to the extent they may contribute to certain issue-specific cumulative effects.

Potential Cumulative Impacts

As indicated above, the proposed project would not contribute to a significant impact resulting from conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities.

Consistency with local and regional bicycle and pedestrian plans, community plans, and other similar plans and policies would be evaluated at a project-specific level to identify conformance requirements with planned systems (i.e., provision of new bike lanes, construction of connecting sidewalks or trails). All cumulative projects would also be required to make payment of the City's Transportation Fees to ensure that transportation facilities continue to be adequately provided and maintained. As the proposed project was determined to have a less than significant impact in this regard, it is not anticipated that it would contribute to a significant cumulative impact due to a conflict when considered with the cumulative projects.

When using an absolute VMT metric (i.e., total VMT, as recommended for retail and transportation projects), analyzing the combined impacts for a cumulative impact analysis may be appropriate. However, metrics such as VMT/Capita or VMT/Employee (i.e., metrics framed in terms of efficiency, as recommended below for use on residential and office projects), cannot be summed because they employ a denominator.

A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact, and vice versa (OPR 2018).

According to ITE's Regional TIS Guidelines, the proposed project does not fall below the ADT screening threshold of 1,000 ADT. The proposed residential uses are anticipated to generate a VMT/Capita of 18.7 miles during the RTIP Year (2020), which exceeds the 85% significance

threshold. For the commercial uses, the proposed project's restaurant uses are anticipated to generate a VMT/Capita of 27.6 miles during the RTIP Year (2020), which exceeds the 85% significance threshold for all area averages. Although mitigation measure **TR-1** would be implemented to reduce the proposed project's VMT, it would remain above established thresholds, resulting in a significant and unavoidable impact. Therefore, the project would result in significant and unavoidable transportation impact related to VMT.

The project is consistent with the City's General Plan, Local Coastal Program, Zoning, and Housing Element Update, and would not conflict with the RTP/SCS; refer also to EIR Section 3.5, Energy Conservation and Climate Change, for additional discussion. Further, specific TDM strategies are required of the proposed project to reduce VMT impacts to the extent feasible.

According to the OPR Technical Advisory (OPR 2018), increased demand on transit systems throughout a region may cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be adequately addressed through a fee program that allocates the cost of improvements not just to projects located near transit, but on a regional level for all projects that may impose a potential burden on the transportation system.

The proposed project would result in the construction of 250 residential units (including 197 apartments) generating an estimated 628 residents, consistent with the HEU. It is not anticipated that the proposed project would therefore create a significant new demand on existing transportation facilities either locally or on a regional level. Further, similar to other cumulative projects considered, the proposed project would be subject to payment of the City's Transportation Impact Fees to ensure that the City's transportation facilities are adequately maintained over the long-term.

All cumulative projects would be evaluated at a project-specific level to identify whether the project has the potential to result in hazardous conditions relative to transportation and circulation. All such projects would be required to demonstrate conformance with the City's roadway and intersection design standards and would be subject to discretionary review to ensure that the potential to contribute to a substantial increase in hazards would not occur. As appropriate, measures would be incorporated to reduce a project's potential to contribute to any such hazardous conditions. The proposed project would be consistent with City design requirements and would not introduce incompatible uses that would increase the risk of hazardous conditions.

All cumulative projects would also be subject to discretionary review to ensure that adequate emergency access is provided during project construction and operation. Such projects would be required to be designed to City roadway and access standards and to consider the potential for development to contribute to adverse effects on the local and/or regional circulation system,

including on maintaining emergency access at all times. Measures (i.e., traffic control plan, design elements) would be implemented as appropriate to ensure that a project does not contribute to a significant impact relative to inadequate emergency access. The proposed project would not have an adverse effect on the ability to provide adequate emergency access, and all such emergency access and on-site circulation has been designed to City standards. The proposed project is therefore not considered to contribute to a significant cumulative impact in this regard.

Based on the reasons discussed above, however, and that project-specific impacts relative to VMT would be significant and unavoidable, even with the incorporation of mitigation measure **TR-1** to reduce project impacts to the maximum extent feasible and other sustainability-related design features, the project's contribution to VMT impacts is considered to be **cumulatively considerable**.

Mitigation Measures: Implement mitigation measure **TR-1**.

Level of Significance: Significant and unavoidable.