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 *Transportation Impact Study* prepared by Intersecting Metrics (2022; see Appendix K) for the project. Additional information was obtained from the City of Encinitas General Plan Circulation Element (2018). 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 (LOS), is not considered a significant effect on the environment. Therefore, in accordance with the California Environmental Quality Act (CEQA), the LOS analysis is not addressed in this EIR; however, it will still be considered by the City's decision-makers when making General Plan findings for the project. These findings pertain to the project's consistency with LOS 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 LOS policies would not be made.

ENVIRONMENTAL SETTING

Access to the project site is provided from the regional transportation network via Interstate 5 (I-5), La Costa Avenue, Leucadia Boulevard, Piraeus Street, and Plato Place. Descriptions of these roadways are provided below:

- *Interstate 5* - Within the project study area, I-5 is a north–south freeway that runs through the San Diego region. Access from I-5 to the project vicinity is via the La Costa Avenue and Leucadia Boulevard interchanges. Within the City of Encinitas, I-5 has four northbound and four southbound general purpose lanes. The posted speed limit on I-5 is 65 miles per hour (mph) (Intersecting Metrics 2022).

- *La Costa Avenue* - Between the I-5 southbound (SB) ramps and El Camino Real, La Costa Avenue is a four-lane roadway with a posted speed limit of 55 mph. Parking is prohibited along both sides of this segment of the roadway. La Costa Avenue has a raised median east of the I-5 northbound (NB) ramps and a painted median between the I-5 SB and NB ramps. Six-foot-wide Class II bike lanes are present on both sides of the roadway. Sidewalks are provided on both sides of the roadway between the I-5 SB ramps and Piraeus Street; however, sidewalks are only provided along the north side of the roadway, along Batiquitos Lagoon, east of Piraeus Street. It should be noted that there are no active land uses on the south side of the roadway for pedestrians to access. Additionally, there

are no active transit services or facilities along La Costa Avenue within the project study area. Between I-5 and El Camino Real, La Costa Avenue is classified as a four-lane major roadway by the City of Encinitas General Plan Circulation Element (2018); thus, it is built to its ultimate classification (City of Encinitas 2018; Intersecting Metrics 2022).

- *Leucadia Boulevard* - Between the I-5 SB ramps and Garden View Road, Leucadia Boulevard is a four-lane roadway, with a raised median and a posted speed limit of 45 mph. Parking is prohibited on both sides of this segment of the roadway. Buffered Class II bike lanes are provided along both sides of the roadway. Sidewalks are provided along both sides of Leucadia Boulevard between the I-5 SB ramps and Quail Gardens Drive. Single-family residences as well as Doug Timmons Golf Course front onto this segment of Leucadia Boulevard. North Coast Transit District (NCTD) bus route #304 runs along Leucadia Boulevard/Olivenhain Road, between Saxony Road and Rancho Santa Fe Road. Leucadia Boulevard is classified as a four-lane major roadway by the City of Encinitas General Plan Circulation Element (2018); thus, it is built to its ultimate classification (City of Encinitas 2018; Intersecting Metrics 2022).

- *Piraeus Street* - Between La Costa Avenue and Leucadia Boulevard, Piraeus Street is a two-lane roadway, divided by a double yellow lane, with a posted speed limit of 45 mph. Parking is prohibited on both sides of this segment of the roadway. Class II bike lanes are provided on both sides of the roadway with exception of the segment between Christine Place and Olympus Street, in which a Class III bike route, designated by sharrows, is provided in the northbound direction, with the Class II bike lanes continuing in the southbound direction. Sidewalks are generally not provided along Piraeus Street with the exception of a 300-foot segment along the east side of the roadway directly north of Normandy Road, as well as along the east side of the roadway between Leucadia Boulevard and Ocean View Way. No transit services or facilities are located along Piraeus Street. The City of Encinitas General Plan Circulation Element does not classify Piraeus Street as a Circulation Element roadway (City of Encinitas 2018; Intersecting Metrics 2022).

- *Plato Place* - Plato Place is a two-lane, undivided roadway with no posted speed limit. Parking is prohibited along both sides of the roadway. No bicycle, pedestrian, or transit facilities are presently located along Plato Place. The road provides a connection point between a single-family neighborhood to the east and Piraeus Street. The City of Encinitas General Plan Circulation Element does not classify Plato Place as a Circulation Element roadway (City of Encinitas 2018; Intersecting Metrics 2022).

There are no transit routes that operate bus stops within the project vicinity. As mentioned above, NCTD bus route #304 operates along Leucadia Boulevard/Olivenhain Road between

Saxony Road and Rancho Santa Fe Road, approximately 1 mile southeast of the project site. The La Costa Avenue park-and ride facility is located approximately 0.3 miles north of the project site, across La Costa Avenue. The closest major transit station to the project site is the Encinitas Transit Station, located approximately 2 road miles south. The 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 0.6 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 (portions of) the eastern side of Piraeus Street directly north of Normandy Road and between Leucadia Boulevard and Ocean View Way; both sides of La Costa Avenue (except along Batiquitos Lagoon where sidewalks are only present along the north side of the roadway); and both sides of Leucadia Boulevard. The project site is located approximately 0.6 miles south of Batiquitos Lagoon, which provides opportunities for passive and active recreation.

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 Metropolitan Planning Organization (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 375 aimed at reducing regional greenhouse gas (GHG) emissions from automobiles and light-duty trucks through changes in land use and transportation development patterns.

SANDAG serves as the RTPA for the Southern California region and is therefore required to adopt and submit an updated RTP to the California Transportation Commission and the California Department of Transportation (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 Senate Bill 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/SCS are components of *San Diego Forward: The Regional Plan*, adopted by SANDAG in 2019.

State

Senate Bill 375

Senate Bill 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 GHG reduction goals established by Assembly Bill 32. Senate Bill 375 requires MPOs 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.

Senate Bill 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 GHGs 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. Senate Bill 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

Senate Bill 743 was signed into law in 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, Senate Bill 743 changed the way that transportation impacts are analyzed under CEQA (see Public Resources Code Section 21099).

Senate Bill 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to exclude LOS and auto delay when evaluating transportation impacts.

With implementation of Senate Bill 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. 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 Senate Bill 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 Guidelines Section 15064.3 reflect this change. Under Section 21099, automobile delay, as measured by LOS 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 LOS 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 and Safe Routes to School Plan

The federal Safe Routes to School Program is implemented by the Department of Transportation to encourage primary, middle, and high school students to walk and bicycle to school and provide safe means of doing so. Each state is apportioned funds, which are distributed to state, local, and regional agencies to finance program-related non-infrastructure activities, such as public awareness campaigns, and infrastructure projects in the vicinity of schools (defined as the approximately 2-mile area within bicycling and walking distance of the school). The City adopted its *Let's Move Encinitas! Pedestrian Travel and 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 multimodal 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 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.

STANDARDS OF SIGNIFICANCE

Methodology

The following summarizes the methodology used in this analysis. Additional background information and an in-depth discussion as to the technical approach is provided in Appendix K of this EIR.

Screening Criteria

OPR's Technical Advisory identifies screening criteria, which, if met, assume that a project would have a less than significant VMT-related impact. Such screening criteria include: small projects, defined as projects generating less than 110 average daily trips (ADT); projects located in a VMT-efficient area or Transit Priority Area; 100 percent affordable housing projects; and locally serving uses. If a project meets any of the screening criteria, a detailed VMT analysis is not required. If a project does not meet the screening criteria, a VMT analysis is required. Refer to Appendix K for additional discussion.

Analysis Metrics

For residential projects, Section E.2 of OPR's Technical Advisory recommends that VMT/capita be analyzed to determine if a project would result in a significant transportation-related impact. The VMT/capita metric 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-home-based 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 determine resident VMT/capita.

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. For the purposes of the project, therefore, the analysis can be conducted by comparing either: 1) the project VMT/capita, or 2) the project VMT/employee to both the San Diego regional average or the average for the city or community in which the project is located.

For residential land use developments, a project is considered to have a less than significant transportation-related impact if the project VMT/capita is lower than 85 percent of the regional average or 85 percent of the average for the area in which the project is located. For purposes of analysis, projected VMT/capita was compared to average VMT/capita for the San Diego region. The significance thresholds for the San Diego region are shown in Table 3.12-1.

Table 3.12-1: Significance Thresholds

Land Use	Metric	Average VMT in Miles[a]	Regional VMT per Capita Threshold (Miles)[b]
San Diego Region			
Residential	VMT/Capita	18.9	16.1

Source: Intersecting Metrics 2022 (see Appendix K).
Notes:
a. SANDAG Series 14 Transportation Forecast (Series ID 458)
b. A significant impact occurs if the project VMT/capita exceeds the stated the threshold.

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 via a proposed drive that would extend through the site and provide access/egress at Piraeus Street and Plato Place. Both entries/exits are intended to serve as emergency/fire access points.

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 Local Transportation Assessment was prepared for the project. As previously stated, to be consistent with the CEQA Guidelines, a LOS analysis is not required for purposes of this EIR's impact analysis. However, the LOS analysis will be considered by the City's decision-makers when making General Plan findings for the project.

The project does not propose any features that are inconsistent with applicable policies of the City's General Plan Circulation Element. Further, the proposed residential use is consistent with that assumed for the subject site in the City's General Plan Housing Element Update, and therefore, the project would not result in a land use considered to be incompatible with surrounding uses.

The project would be subject to payment of the City's transportation fees to ensure continued adequacy of the local and regional transportation systems. No conflict with an applicable program, plan, ordinance, or policy addressing the circulation system would occur with regard to area roadways or intersections affected by the proposed project.

The project has been designed to provide access to alternative means of transportation and to encourage residents and guests to the project site to utilize such modes of travel. As noted above, NCTD bus route #304 operates bus stops 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 enabling regional connections along the route.

The homeowners association (HOA) serving the proposed development would provide information pertaining to available alternative modes of transportation in the area as part of the "new resident" or "new tenant" package. The HOA would also provide residents with transit schedules for the area and would alert residents when new transit services are added or when services are changed. The closest major transit station to the project site is the Encinitas Transit Station, located approximately 2 road miles to the south. The transit station also provides access to NCTD's COASTER (commuter heavy rail) and NCTD bus routes #101, #304, and #309. Therefore, project residents would have access to both local and regional transit systems.

Bike lanes are present along both sides of La Costa Avenue, Leucadia Boulevard, and Piraeus Street 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 northbound bike lane during project improvements at the Piraeus Street entrance. Additionally, the project applicant would work with the City and its bikeshare vendor to expand the electric

bikeshare program to the project site. Such efforts are intended to provide users with on-demand access to electric pedal-assist bikes for short-term rentals and to encourage a shift from the use of vehicles to bicycles.

As described above, in 2015, the City of Encinitas adopted its *Let's Move Encinitas! Pedestrian Travel and Safe Routes to School Plan*, which identifies opportunities to implement traffic improvements near schools and to encourage students to bike or walk to school. In the project area, students in kindergarten through sixth grade would attend Capri Elementary School, located at 941 Capri Road, approximately 0.4 miles southeast of the project site (EUSD 2022). Project components would support implementation of the plan by providing direct access to bicycle lanes along Piraeus Street and La Costa Avenue and new sidewalks along the project's frontage on Piraeus Street and Plato Place, thus supporting bike and pedestrian travel in urban areas of the City and providing safe pedestrian and bicycle travel in the vicinity of Capri Elementary School. The project does not propose improvements or developments that would hinder implementation of the *Let's Move Encinitas! Pedestrian Travel and Safe Routes to School Plan*; would not remove bicycle lanes or sidewalks; and would not result in unsafe conditions in the vicinity of Capri Elementary School.

As such, the 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. Impacts in this regard 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 method used to derive and evaluate a project's VMT is determined based on a project's trip generation. Trip generation rates for the proposed project were developed utilizing SANDAG's *(Not So) Brief Guide to Vehicular Trip Generation in the San Diego Region* (SANDAG 2022). Table 3.12-2, Project Trip Generation, identifies the estimated daily trip generation for the project.

Table 3.12-2: Project Trip Generation

Proposed Land Use	Units	Trip Rate	Average Daily Traffic (ADT)
Multi-Family Units (20+ DU/acre)	149 DU	6/DU	894

Source: Intersecting Metrics 2022 (see Appendix K).
DU = dwelling units

The project site is currently undeveloped and does not produce daily vehicle trips. As shown, the project as proposed (149 residential units) would generate an estimated 894 ADT.

As described above, OPR's Technical Advisory identifies screening criteria, which, if met, assume that the project would have a less than significant VMT-related impact. The project does not meet these criteria (i.e., does not generate less than 110 ADT), and therefore, an analysis of VMT per capita was conducted using the SANDAG Series 14 Regional Growth Forecast (ABM2+) and associated San Diego Region SB-743 VMT Maps, which provide the most current VMT/capita data by Traffic Analysis Zone (Intersecting Metrics 2022). The results of the ABM2+ VMT output are provided in below Table 3.12-3, VMT Impact Analysis; refer also to Appendix K for additional discussion.

The proposed residential uses are anticipated to generate a VMT/capita of 23.7 miles, which exceeds the 85 percent significance threshold of 16.1 miles by 7.6 miles. Therefore, the project would have a potentially significant VMT related transportation impact.

As shown in Table 3.12-3, the project would require a 32.1 percent (or 7.6 mile) reduction in VMT/capita for VMT-related impacts to be less than significant. The project's VMT/capita is 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 project would implement an electric bikeshare program and provide access to existing off-site bicycle lanes; would include a suite of project design measures 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, Climate Action Plan, and SANDAG's The Regional Plan, project impacts related to VMT/capita would not be reduced to less than 85 percent of the regional average.

It is noted that this impact is primarily a result of the geographic location of the proposed project in a suburban neighborhood; trip characteristics of the surrounding residential land uses were 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 Impact Analysis

Metric	Regional VMT Per Capita Average (in Miles)	Project Site VMT per Capita (in Miles)	Regional VMT Per Capita Threshold in Miles (85% of Regional Average)	Project % of Regional Average	Difference (in Miles)	Significant Impact?[1]
VMT/Capita	18.9	23.7	16.1	32.1	7.6 miles over	**Yes**

Source: Intersecting Metrics 2022 (see Appendix K).

[1] Significant impact if project VMT is greater than 85 percent of the regional average.

To reduce the VMT/capita associated with the project to a less than significant level, VMT reducing measures are required. Accordingly, a Transportation Demand Management (TDM) analysis was conducted using the California Air Pollution Control Officers Association's (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (GHG Handbook) to identify the type and magnitude of TDM features the project would need to implement to reduce project VMT to less than significant levels (Intersecting Metrics 2022). To quantify the potential reduction in project-generated VMT, the VMT-based reduction strategies were applied to relevant project features and identified in the TDM plan. Refer to Table 3.2 of Appendix K for a complete list of the TDM measures outlined in CAPCOA's GHG Handbook.

Implementation of the TDM plan is aimed at vehicle trip reduction, increased use of alternative travel modes, and better traffic management in the project area. The TDM program calculates both potential reduction and assumed reduction of VMT-related impacts related to the project. Assumed reduction is a more conservative estimate and was therefore the only calculation used for the purposes of CEQA analysis. Proposed TDM measures are summarized in Table 3.12-4, TDM Reduction Calculation, as will be implemented as part of the required conditions of approval for the project.

Table 3.12-4: TDM Reduction Calculation

#	Measure	Potential Reduction (%)	Assumed Reduction (%)	Description	Feasible?	Reduction Taken?
T-1	Increase Residential Density	30	0	This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of dwelling units (du) compared to the average residential density in the U.S. Increased densities affect the distance people travel and provide greater options for the mode of travel they choose. Increasing residential density results in shorter and fewer trips by single-occupancy vehicles and thus a reduction in VMT. This measure is best quantified when applied to larger developments and developments where the density is somewhat similar to the surrounding area based on underlying research being founded in data from the neighborhood level.	*Yes* - The project would have a net density of 21.7 dwelling units per acre. This is well above the residential density of a typical development cited in the CAPCOA Handbook of 9.1 units per acre. Note: VMT reductions associated with increased density may be already accounted for in ABM2+, in which the project VMT per capita was calculated.	Up to a 30 percent reduction can be assumed for the project; however, since it is unknown how much of this reduction is captured by ABM 2+, no reduction is assumed.
T-4	Integrate Affordable and Below Market Rate Housing	2.86	2.86	This measure requires below market rate (BMR) housing. BMR housing provides greater opportunity for lower-income families to live closer to job centers and achieve a jobs/housing match near transit. It is also an important strategy to address the limited availability of affordable housing that might force residents to live far away from jobs or schools, requiring longer commutes. The quantification method for this measure accounts for VMT reductions achieved for multifamily residential projects that are deed-restricted or otherwise permanently dedicated as affordable housing.	*Yes* - Of the 149 residential homes proposed in the community, 134 would be market-rate homes and 15 (10 percent) would be very low-income affordable residential homes.	N/A

Table 3.12-4, continued

#	Measure	Potential Reduction (%)	Assumed Reduction (%)	Description	Feasible?	Reduction Taken?
T-18	Provide Pedestrian Network Improvement	0	0	This measure would increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT and GHG emissions.	*Yes* – The project would construct over 1,100 linear feet of new sidewalk facilities on both Piraeus Street and Plato Place, along the project frontage.	The project would implement over 1,100 linear feet of sidewalk facilities; however, due to the existing lack of sidewalk facilities within the area, no reduction can be assumed.
T-23	Provide Community-Based Travel Planning	2.3	2.3	This measure would target residences in the plan/community with community-based travel planning (CBTP). CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single-occupancy vehicles, thereby reducing household VMT.	*Yes* - It is assumed that the HOA for the project would provide information about alternative modes of transportation to residents and tenant as a part of the "New Resident" or "New Tenant" package. The HOA would also provide residents with transit schedules within the area, and alert residents when new transit services are added, or services are charged. The HOA would also act as Travel Advisor, providing new residents and tenants with information regarding how members of households can travel in alternative ways that meet their needs.	N/A
	Total[a]	**33.6**	**5.1**	**--**	**--**	

Source: Intersecting Metrics, 2022 (see Appendix K).

Notes:

a. As per the CAPCOA GHG Handbook, the dampening effect should be applied to all measures when adding them together. Therefore, the totals reflect the formula 1-[(1-T1) x (1-T-4) x (1-T8)…].

As shown in Table 3.12-4, if all potential TDM measures were fully realized, the project's VMT would be reduced by 33.6 percent. However, assuming the full reduction for some of the measures identified may not be appropriate, as implementation is not feasible or cannot be guaranteed. To be conservative, a 5.1 percent reduction was assumed, thereby reducing the project's VMT per capita to 22.5 miles (Intersecting Metrics 2022). Appendix K provides a detailed analysis of the calculated VMT reductions achieved for each of the measures identified.

Table 3.12-5: VMT-Related Impact After Mitigation

Regional VMT Per Capita Threshold (in Miles)	Project Site Base VMT Per Capita (in Miles)	Feasible VMT Reduction Through Mitigation	Project Site VMT Per Capita With Mitigation (in Miles)	Significant Impact After Mitigation?
16.1	23.7	5.1%	22.5	**Yes**

Source: Intersecting Metrics 2022 (see Appendix K).

As described above, the project would require a 32.1 percent reduction in VMT to result in a less than significant impact. However, the assumed reduction of VMT with the proposed TDM measures is expected to be 5.1 percent, since several of the TDM measures may not be appropriate for the proposed project. Therefore, with the achieved reduction of 5.1 percent, VMT per capita for the project with mitigation incorporated would be 22.5 miles, and therefore, would still exceed the established threshold; refer to Table 3.12-5, VMT-Related Impact After Mitigation.

As discussed, implementation of the proposed TDM measures would not reduce project-related VMT impacts below the established threshold. As there are no additional quantifiable VMT reducing measures that the project can feasibly implement, transportation impacts relative to VMT would remain **significant and unavoidable**.

Mitigation Measures: No feasible mitigation is identified.

Level of Significance: Significant and Unavoidable. While the project proposes sidewalks along Piraeus Street and Plato Place; includes project design measures 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, Climate Action Plan, and SANDAG's The Regional Plan, impacts related to VMT/capita would not be reduced to 85 percent of the regional average, even after incorporation of TDMs as a required condition of project approval. As there are no additional quantifiable VMT-reducing measures that the project can feasibly implement, the project's VMT-related impacts would remain significant and unavoidable.

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.**

As stated under Impact 3.12-1, minor improvements would be required to ensure adequate access to the project site along Piraeus Street and Plato Place. The project design includes a two-way, 26-foot-wide interior drive that would extend through the project site, providing connection between Piraeus Street and Plato Place. The interior driveway would also connect to several 24-foot-wide internal/emergency access drives that would provide vehicular access to residences and recreational amenities (refer to Figure 2.0-3, Conceptual Site Plan). All project roadway and access improvements have been designed in conformance with City engineering design standards and are subject to City and Fire Department review and approval to minimize potential hazards or effects on public safety. Therefore, the project does not propose any roadway improvements that would result in sharp curves or dangerous intersections either on-site or off-site.

Additionally, in conformance with City requirements, the project applicant would prepare a traffic control plan to ensure that adequate circulation on surrounding local roadways is maintained during the construction phase. Implementation of the traffic control plan would ensure that no hazardous conditions are created that would interfere with public safety and/or emergency vehicle movement during project construction.

Based on the above discussion, the 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 Piraeus Street and Plato Place. Both access points would be designated as emergency/fire access way entrances to ensure that emergency access/egress for the development can be adequately accommodated.

Interior circulation is proposed via a two-lane, 26-foot-wide interior roadway that would extend through the site and provide connection between Piraeus Street and Plato Place. The main roadway, along with internal/emergency access drives, would provide vehicular access to the residential units and recreational amenities. Emergency vehicle turnarounds are proposed on-site to ensure that adequate movement of emergency vehicles can be accommodated. Additionally, signage would be installed along on-site roadways/drives to prohibit parking, thereby ensuring that emergency access is maintained at all times; refer to Figure 2.0-3, 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 project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. As stated above, 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.

For the reasons above, 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 Housing Element Update sites to the extent they may contribute to certain issue-specific cumulative effects; refer to Table 3.0-2.

Potential Cumulative Impacts

As indicated above, the 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 (e.g., provision of new bike lanes, construction of connecting sidewalks or trails). All cumulative projects would also be required to pay 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 other 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). As previously indicated, the proposed residential uses are anticipated to generate a VMT/capita of 23.7 miles, which exceeds the 85 percent significance threshold of 16.1 miles, and therefore, a significant impact would occur. Although TDMs to reduce the project's VMT would be implemented as part of the project conditions of approval, project VMT would remain above established thresholds, resulting in a significant and unavoidable impact. Therefore, the project would result in a significant and unavoidable transportation impact relative to VMT.

The project is consistent with the City's General Plan, Local Coastal Program, Zoning Ordinance, 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 project would result in the construction of 149 residential townhomes. According to the City's General Plan Housing Element Update, the subject site could be developed with up to 206 base residential units (without application of a Density Bonus). Therefore, the project would be consistent with future development as identified in the Housing Element Update and it is not

anticipated that the project would create a significant new demand on existing transportation facilities, either locally or on a regional level, due to the limited project scale. Similar to other cumulative projects considered, the project would be subject to payment of the City's transportation impact fees to ensure that area transportation facilities are adequately maintained over the long term.

All cumulative projects would be evaluated at a project-specific level to identify whether a 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 project as proposed would be consistent with City design requirements and would not introduce incompatible land 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 (e.g., 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 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 project is therefore not considered to contribute to a significant cumulative impact in this regard.

However, based on the reasons discussed above, and that project-specific impacts relative to VMT would be significant and unavoidable, even with incorporation of sustainability related design features aimed at reducing project impacts to the maximum extent feasible, the project's contribution to a significant cumulative impact relative to VMT is considered to be **cumulatively considerable**.

Mitigation Measures: No feasible mitigation is identified.

Level of Significance: Significant and unavoidable.

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