City of Encinitas
Development Services Department
505 S. Vulcan Avenue, Encinitas, California 92024-3633

June 7, 2018

Department of Housing and Community Development
Division of Housing Policy Development
Attn: Ms. Robin Huntley
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Re: Public Comments Received on the City of Encinitas Draft Housing Element Environmental Assessment

Dear Ms. Huntley:

Thank you for forwarding correspondence received by HCD on May 30, 2018 from Glen Johnson in reference to the City's Draft Housing Element and the Environmental Assessment. The City's responses are provided below.

Form and Purpose of Environmental Assessment

Pursuant to California Government Code Section 65759, an Environmental Assessment (EA) has been prepared to identify the potentially significant environmental effects from the Housing Element Update and the related General Plan and zoning changes. As required by Section 65759, the EA substantially conforms with the requirements of a draft environmental impact report, and it provides the public and decision makers a detailed analysis of the Housing Element's potential environmental effects.

As noted in the comment letter, the EA identifies potential impacts associated with implementing the Housing Plan Update 2018, and it includes mitigation measures to reduce the effect of impacts to the extent feasible. As is common with programmatic environmental review documents, the EA concludes that some impacts may remain significant and unavoidable, because it is not yet possible to analyze the precise features of every subsequent development project. However, many of the mitigation measure require site-specific analysis and mitigation to further reduce individual project impacts as future projects develop.

The comment letter also states that the Encinitas General Plan (EGP) Circulation Element update is “overdue.” A Circulation Element Update is not necessary to bring the Housing Element into compliance with State Law, thus, is not a proposed discretionary action analyzed in the EA or proposed as part of this project. The EA does include a *Traffic Impact Study* (see EA Appendix G) to analyze the potential traffic impacts associated with the Housing Element, and nothing in the Housing Element or the EA would preclude the City from subsequently updating its Circulation Element.

Updated Mitigation Measure TRF-1

The comment letter notes that the EA revised the mitigation program included in the 2016 Program EIR for the At Home in Encinitas plan. Specifically, Mitigation Measure TRF-27, which required completion of a Nexus Study and adoption of a Housing Element Update (EHU) Fee Mitigation Program, has been deleted and replaced with Mitigation Measure TRF-1, which requires site specific traffic analysis prior to the approval of discretionary permits for subsequent projects and a fair share contribution based on the development's contribution to impacts if the City has adopted a Capital Improvement Program.

The comment letter opines that a Nexus Study and a Traffic Impact Fee would help mitigate traffic impacts. At this time, the timeline for developing and implementing a Nexus Study and Traffic Impact Fee is uncertain, so that approach is not recommended as a mitigation measure. However, a site specific analysis and fair share contribution allows the City to require project contributions to fund traffic improvements before such a program is implemented. Therefore, it is more likely that revised Mitigation Measure TRF-1 will result in a reduction in project-specific traffic impacts.

Traffic Impact Study Data

The comment letter raises general concerns regarding increased traffic volumes in the Project area and cumulative traffic. The baseline for the impact analysis continues to be the adopted Encinitas General Plan, just as it was in the 2016 Program EIR. The EA's impact analysis evaluates the effect of adding the Housing Element Update's future housing units to the General Plan's build-out forecasts. The General Plan 2035 build-out forecasts include traffic associated with existing development, plus the additional development and growth that it would take to effect General Plan build-out. Any new development that has occurred since the 2016 PEIR, including infill development and area growth, is a component of the growth increment that it will take to arrive at the General Plan 2035 build-out condition. Therefore, any traffic increases that may have occurred since 2016 are inherently incorporated into the cumulative traffic analysis.

It is also noted that the traffic forecast for the proposed candidate sites in the EA represents approximately 50% less than the traffic forecast in the 2016 Program EIR, particularly in the areas mentioned. For example, the proposed candidate sites' forecast traffic represents a decrease of 10,000 vehicles per day compared to the 2016 Program EIR in the areas mentioned along Encinitas Boulevard and the 101.

It is noted, the Cumulative Analysis section referenced in this comment (i.e., Section 7.3.11) pertains to Population and Housing- not Transportation and Traffic. The EA correctly identifies that the Housing Element would not result in a cumulatively considerable contribution to Population and Housing Impacts. However, the EA concluded Project implementation would result in significant unavoidable impacts to roadway segments, intersections, and ramp intersection/ramp metering throughout the City and surrounding jurisdictions within the cumulative study area. It was further concluded these significant impacts would likewise represent significant cumulative impacts with respect to traffic.

North 101 Streetscape Improvements Project

The General Plan 2035 forecasts reflect the currently adopted General Plan, including the adopted land uses and circulation network, and therefore, the forecasts do not reflect the North Highway 101 Streetscape Improvements Project. The North Highway 101 improvement project's traffic analysis indicates that with project implementation, traffic volumes on most

Highway 101 segments would decrease by as much as 17% when compared to the No Build scenario, in response to the reduction in lane capacity and implementation of roundabouts. Therefore, by analyzing the Housing Element's impact with the General Plan 2035 forecast, the EA conservatively assumes more traffic than would be expected following implementation of the North 101 project.

It is also noted that the EA concludes project-related traffic along Highway 101 would be 70% to 80% less than the project-related traffic assumed in the 2016 Program EIR.

La Costa Boulevard

The comment letter observes that La Costa Boulevard's level of service (LOS) is projected to change to LOS F. The EA concluded the Project would significantly impact the following two La Costa Avenue segments and recommended mitigation measures (see Mitigation Measure TRF-1 Table A, *Traffic Mitigation Improvements*) that, to the degree feasible, could mitigate impacts:

- North Coast Highway 101 to Vulcan Avenue: Provide additional right-of-way (ROW) and widen to a 4-Lane Collector. Insufficient ROW, therefore, considered infeasible.
- Vulcan Avenue to Sheridan Road: Provide additional ROW and widen to 4-Lane Collector. Considered feasible

The La Costa Avenue (North Coast Highway 101 to Vulcan Avenue) segment recommended improvement was considered infeasible because insufficient ROW exists and the City/Community prefer to retain existing adjacent uses instead of exercising eminent domain. Thus, eminent domain would not be exercised and housing would not be eliminated, as stated in this comment. Therefore, that measure is not feasible to implement.

However, Vulcan Avenue to Sheridan Road improvements are feasible to implement if the City includes them in its CIP. Although the EA conservatively assumes a significant impact because funding for this improvement is not yet certain, it is possible that this improvement would be implemented and impacts to La Costa Boulevard would be less than currently assumed.

Traffic Impact Study Assumptions

The comment letter states the Traffic Impact Study bases its Future Year 2035 forecast traffic on recommended improvements (e.g., Encinitas Boulevard (Balour Drive to Via Cantebria) provided additional ROW and widening to 6-Lane Prime Arterial). However, the LOS in the EA is actually presented for three scenarios: Future Year 2035 Without Project; Future Year 2035 With Project; and Future Year 2035 With Project With Mitigation. Thus, the Traffic Impact Study considered all three scenarios, including impacts without the incorporation of mitigation, not simply the one data point noted in the comment letter.

EA Organizations and Persons Consulted

This comment letter accurately notes the Encinitas Traffic Engineering Department was not included in EA Chapter 10, *Organizations and Persons Consulted*. However, the Encinitas Traffic Engineering Department was consulted during preparation of the Traffic Impact Study and this was an error.

This comment also states no citizen input was solicited in the preparation of the Traffic Impact Study. However, while citizen input was not specifically solicited in the preparation of the Traffic

Impact Study, which is a technical document compiled by professional engineers, public input was solicited concerning the Housing Element overall. The planning processes and community engagement that have occurred since 2016 are discussed on EA pages 3-3 and 3-4 and in Appendix A of the Housing Element.

CALTRANS Work on I-5

This comment letter incorrectly states the effects of CALTRANS work on I-5 were not considered in the Traffic Impact Study. The General Plan 2035 forecasts were developed using the City of Encinitas subarea model. The I-5 North Coast Improvement project was assumed in the model, and therefore the effects of increased use of the freeway in response to the added capacity would be included in the forecasts and the freeway ramp analysis used in the EA.

Increased Rail Traffic and Capacity

This comment states that rail traffic and capacity will increase, which are anticipated to decrease traffic volumes on the I-5, but increasing volumes on the local roadways. Build-out modeling on a regional level does consider transportation facilities and planned improvements, including multi-modal transportation facilities, such as transit and rail terminals, commuter rail improvements, transit corridors, etc. Any surface street or intersection improvements needed to accommodate the vehicular traffic to/from the transportation centers would be the responsibility of the respective agencies. As noted above, the proposed Housing Element represents a decrease in project-generated traffic of 10,000 vehicles per day compared to the 2016 Program EIR in the Encinitas Coaster Station vicinity.

Trip Generation Assumptions

The comment letter asks whether the estimated ADT considered development under R-30/with the increase allowed by Density Bonus. To clarify and as stated on EA page 1-1, the candidate sites' maximum realistic yield (MRY) of 2,494 DU is based on the proposed General Plan, Zoning Code, and Specific Plan Amendments, which would permit a maximum density of 30 DU per net acre; see EA Appendix B, *Candidate Sites Table*. The Project's estimated ADT (14,965-see EA Table 4.13-1) is based on 2,494 DUs on the 17 candidate sites, thus, the estimated ADT considered development at a maximum density of 30 DU per net acre without additional increases due to density bonus. However, to be conservative in its estimates of the potential impacts, the EA assumed a larger potential MRY than HCD considers feasible for each site. Therefore, even if some sites take advantage of state and local density bonus programs, the overall impacts are not likely to exceed those disclosed in the EA. Moreover, if changes to an individual project result in significantly greater impacts than have been disclosed or analyzed, subsequent environmental review could be required.

Concerning the comment that the "traffic peak hours are bursty," residential development trip-making patterns over the course of a typical day are among the most predictable and consistent of all land uses. The peak hour trips associated with a residential development is generally 8% of the total daily trips during the morning peak hour and 9% to 10% during the evening peak hour. These trips are most typically related to work commute trips and morning school trips. Most of the remaining trips associated with each residential unit occur throughout the day and early evening, and are associated with errands, shopping, recreation, and mid-afternoon school trips. A small proportion of residential trips occur during the late-night hours.

Intersection Analysis Worksheets

The comment letter states the Intersection Analysis Worksheets in Appendix A (pages 53-421) add bulk to the report and detract from the EA. However an EA is required to substantially conform to the contents of a draft EIR, and evidence is needed to support each of the conclusions in the EA. The Intersection Analysis Worksheets demonstrate how the EA arrived at its conclusions, and are appropriate to include.

Mitigation Measures

The comment letter states that the proposed roadway segment Mitigation Measures are only to provide additional ROW and widen the roadway, but, more significant mitigation would be needed. However, Mitigation Measure TRF-1 Table A already includes, to the degree feasible, a full list of improvements capable of mitigating impacts.

This comment also states that the proposed Housing Element project is not the only project in Encinitas, and discusses impacts from schools, beach traffic, and parking. This is acknowledged and incorporated into the EA analysis. The increment of growth in traffic between current and General Plan 2035 conditions is the result of the anticipated development of the City's remaining development potential. The General Plan 2035 traffic forecasts anticipate this future development.

School drop-off traffic is a component of the typical morning peak hour drive-time traffic. Afternoon school pick-up traffic generally occurs during the mid-afternoon hours (2:30 to 3:30 PM), before the evening commute peak hour. The Housing Element project does not propose to add any school facilities, but a portion of the typical trip-making from the residential units can be expected to be oriented to/from the schools nearest to each site. This was considered in the project trip-making and trip distribution. Similarly, any congestion regarding beach recreation is included in existing conditions and General Plan forecasts and inherently incorporated into the EA's analysis.

Finally, parking is not a State CEQA Guidelines Appendix G or City of Encinitas threshold for environmental impacts. Notwithstanding, each future development would be subject to compliance with the City's off-street parking standards.

Should you have any further questions or comments, please feel free to contact me directly at 760/633-2712 or bwisneski@encinitasca.gov.

Sincerely,

Brenda Wisneski, AICP
Development Services Director

Flaws In The Environmental Assessment

Glen D. Johnson

30 May 2018

An Environmental Assessment should be a concise public document (giving a lot of information clearly and in a few words; brief but comprehensive) to provide sufficient evidence and analysis regarding the significance of environmental impacts of the proposed action. The EA should also offer alternatives to aid in decision-making.

It is understood that an Environmental Assessment is not required to be as comprehensive as a full Environmental Impact Report. The EA can suggest mitigation of some effects but further study work may be needed to develop a feasible plan, one that can be accepted by the community, especially with respect to items for which the suggested mitigation is too intrusive or costly.

Encinitas is overdue for updating the "Circulation Element" This was promised by our last Mayor to be done as soon as the Measure T "Housing Element" was complete. Now this is way overdue. The Traffic Impact Study in the Environmental Assessment is a step forward but is not a substitute for the traffic studies required for a more detailed Circulation Element.

The comments in this note concern primarily Section 4.13 and Appendix G, the Traffic Impact Study of the May 2018 Kimley-Horn Environmental Assessment for the Encinitas Draft Housing Update, but some references will be made to other sections of the Assessment.

1. page 37 of the Executive Summary concerns transportation and traffic and concludes that there is "significant unavoidable impact". In strikeout type is the proposed mitigation measure TRF-271, which suggests a nexus study by the city. This was replaced with a softened suggestion for a site-specific study for each site but only if the city had adopted a capital improvement program.

We think that a transportation impact fee nexus study can and should help insure that new development pays its fair share of the costs of necessary infrastructure improvements.

2. The Traffic Impact Study for 2035 is based on data from the Chen Ryan April 2016 PEIR. However, over the last two years there has been an increase in traffic in several ways and this was not reflected in the Traffic Impact Study. Additionally, other projects during the implementation period will cause increased traffic.

First, traffic has steadily increased since 2016 due to infill developments within Encinitas. This has worsened the existing level of service values over the 2016 levels. This has been observed especially on Leucadia Blvd., Encinitas Blvd. and 101 (North and South) and also on Rancho Santa Fe Road and Manchester Avenue near I5.

Second, the pattern of commercial use has changed, mostly resulting in increased traffic and more bottlenecks. In one instance, since the Lazy Acres market opened in October 2016 the level of service on Encinitas Blvd has severely degraded. It has at times caused stop-and-go traffic in both directions from 101 through Delphinium Street. Other known bottlenecks have also gotten worse, for instance the Starbucks on Orpheus Avenue has produced a chronic bottleneck at Leucadia Blvd.

Third, Encinitas is encouraging accessory or inclusionary units in single-family homes. As this program becomes more successful both new and remodel projects will increase the number of vehicles beyond the 2016 values.

Fourth, the Cumulative Analysis (Chapter 7.3.11) concluded that infill/redevelopment "would not cumulatively contribute to significant adverse cumulative impacts". We observe that ambient growth in Encinitas often uses density bonus to replace older homes on large lots with even more homes than zoning would otherwise permit. There are many sites in Encinitas that meet this criteria, both in past development and in future potential.

Fifth, cut-through rush hour traffic throughout Encinitas has increased due to new housing developed in Carlsbad and San Elijo Hills. Queues for I5 are longer and evening rush-hour traffic is slower then it was in 2016. Development in those cities is continuing and is not something that Encinitas can control.

3. The Environmental Assessment classifies all of North Coast Highway 101 from Encinitas Blvd to La Costa Avenue as a 4-lane Major Roadway with a capacity of 35,200 ADT. However, the North 101 StreetScape Project aims to trim that to 2 lanes. That's 14,000 ADT at LOS E, anything more is LOS F. Additionally, the 1-lane roundabouts proposed for North Coast Highway 101 cannot handle larger traffic volumes and there is no land available for larger roundabouts.

4. La Costa Blvd. is mentioned as going to LOS "F" unless the city can provide additional right-of-way and widen the roadway to a 4-lane collector. This will require eminent domain and the probable elimination of some existing housing.

5. Kimley-Horn bases their 2035 projections on assumptions such as: "Provide additional right-of-way and widen all of Encinitas Blvd between Via Cantebria and I5 to a 6-lane prime arterial". Encinitas has no funding to widen this street in this way. The reason for the curves and narrow spots in streets such as Encinitas Blvd. and Santa Fe is the rough terrain of the hills between 101 and El Camino Real. The cost and difficulty of cutting into the steep sandstone slopes in such places exceeds the value provided by the widening.

6. Chapter 10 lists the organizations and persons consulted. The Encinitas Traffic Engineering department was not listed a collaborator, nor was CALTRANS. Additionally, no citizen input was solicited in the preparation of this study. This is a fault of many studies where the consulting company wins a contract award and prepares a report without utilizing community expertise. In a city such as Encinitas community involvement is vital to acceptance of the results of a study. Without such an effort many studies end up only collecting dust.

7. The effects of CALTRANS work on I5, both the current Phase 1 and the yet-to-be-funded Phase 2 was not considered in the Assessment. It is reasonable to assume that increased capacity of I5 will increase the use of the freeway ramps in Encinitas, both by locals and cut-throughs, and further increase the ADT number.

8. Rail traffic and capacity will increase. The Coaster is currently constrained by single-tracking, however SANDAG/CALTRANS plan to double-track the entire corridor and construction is under way. When completed this will allow additional Coaster trains, more frequent service, and greater capacity. When we talk about traffic it is important to realize that automobiles are not the only means of moving people. The wrinkle here is that train travel can reduce some of the burden on I5 but getting to and from the Coaster station may increase car traffic on surface streets and require more parking at the transit center.

9. Estimated ADT in the report is based on the assumption of 2,494 new DUs on the 17 sites. I don't know whether that number includes development under R-30 or with the increase allowed by Density Bonus. This needs to be clarified. Addtionally, traffic peak hours are bursty. A large ADT value may be handled if traffic is distributed over the day but more commonly there are rush times in one direction or another at different times of day.

10. Chapter 10 did not indicate any consultation with the Encinitas Traffic Engineer, or CALTRANS, nor the areas of Carlsbad, Rancho Santa Fe, and Solana Beach. There is no indication that any residents of Encinitas participated in this study.

11. The Intersection Analysis Worksheets in Appendix A (pages 53-421) add bulk to the report but they detract from the concise nature of the assessment and provide little understanding. However, since the base numbers are understated the analysis is also incorrect.

12. The proposed Roadway Segment Mitigation Measures are only: "Provide additional right-of-way and widen the roadway". More significant mitigation will be necessary, especially since this is not the only project in Encinitas. For instance, there is in the Planning Department an application for a private school that has the potential to add much traffic to Quail Gardens Drive. Details of mitigation measures are beyond the scope of the Assessment but might include features such as:

* Selected road widening at intersections.
* Features such as roundabouts to slow average speeds while at the same time increasing capacity.
* Citywide synchronization of traffic lights accompanied by selected insertion or removal of some traffic lights.
* Working with CALTRANS to better co-ordinate freeway and local traffic signals.
* Re-striping and new signage and selected lane narrowing.

* Changed transportation patterns, for instance new bus routes.
* One-way streets in selected areas.

Morning and afternoon commute hours are far from the only traffic issues. Regular traffic to and from schools is another source of congestion.

In Encinitas, summer weekends beach traffic is bad and streets are clogged. Improvements at local beaches such South Cardiff State Beach, Moonlight Beach, and Beacons Beach attract traffic.

An issue related to traffic is of course parking. As the number of vehicles on the road increases so does the need to park them both at home and elsewhere in town, whether at shopping centers, beaches, or the transit center. This impact is not covered in this particular Assessment.