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MEMORANDUM

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City of San Diego – Development Services Department

From: Mychal Loomis, P.E., T.E., PTOE, RSP
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Date: December 18, 2020

Subject: Bella Mar Development, PTS #631240, CPA/RZ/SDP/CDP
Transportation VMT CEQA Analysis

Executive Summary

Senate Bill (SB) 743 was approved by the California legislature in September 2013, requiring changes to the California Environmental Quality Act (CEQA) methodology, specifically directing the Governor's Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular "level of service" (LOS) for evaluating transportation projects. OPR published the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) in December 2018 providing recommendations for the preparation of transportation impact analysis under SB 743, suggesting Vehicle Miles Traveled (VMT) to replace LOS as the primary measure of transportation impacts. The Technical Advisory requires updated transportation procedures by July 1, 2020.

The City of San Diego's (City's) Transportation Study Manual (TSM) provides guidance on preparing transportation studies for projects within the City, pursuant to SB 743. The manual addresses the shift from LOS analysis to VMT analysis for CEQA, and updates the LOS methodology that will still be required as part of the Local Mobility Analysis (LMA) for the City.

This memorandum summarizes the VMT CEQA analysis and results for the proposed Bella Mar development located at 408 Hollister Street in the City of San Diego, California, in accordance with the City's TSM. The LMA for this development is provided in a separate document.

Project Information

The proposed project is located at 408 Hollister Street in the Otay Mesa-Nestor Community in the City of San Diego, east of Imperial Beach and south of the City of Chula Vista. The approximately 14-acre site is bounded by Interstate 5 (I-5) to the west and Hollister Street to the east, between Palm Avenue to the south and Main Street to the north, as shown in **Figure 1**. The project site is currently vacant. The site is directly south of the Otay River Valley and north of two vacant adjacent sites. The east side of Hollister Street has an elevated railroad track for the MTS Trolley Blue Line, and a major transit station, the Palm Avenue Trolley Station is located less than ¼ mile south of the Project site on Hollister Street.

The Bella Mar project is proposing to construct 380 multi-family residential units, including 100 affordable units. **Figure 2** shows the proposed project site plan. Access to the site will be established through construction of two unsignalized full-access driveways on Hollister Street.

Methodology

The City's TSM establishes VMT as the performance metric for measuring transportation environmental impacts according to CEQA. The manual provides VMT screening criteria, significance thresholds, analysis methodologies, and mitigation measures for land development and transportation projects under CEQA. This memorandum focuses on the land development project requirements of the TSM.

Initial Screening

Projects are compared against initial screening criteria to determine if the project can be considered less than significant for VMT impact based on project features regarding location, size, and use. The City's screening criteria for determining land development projects as less than significant for VMT include the following:

- **VMT Efficient Location** – Projects located in a VMT Efficient Location per the SANDAG Screening Map
    - Residential or commercial employment – 15% or more below the base year average resident VMT/capita or employee VMT/employee
    - Industrial employment – average or below average base year employee VMT/employee
- **Small Project (Trip-based)** – less than 300 daily unadjusted driveway trips
- **Locally Serving Retail** – 100,000 square feet gross floor area or less and serves a population of roughly 25,000 people or less based on a market area study
- **Locally Serving Public Facilities** – serves the surrounding community such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices, or a public facility that is a passive use such as utility buildings, water sanitation, and waste management
- **Affordable Housing Project** – provides access to transit and meets one of the following criteria: affordable to persons with a household income equal to or less than 50% of the area median, housing for senior citizens, or housing for transitional foster youth, disabled veterans, or homeless persons
- **Mixed Use Project** – can use screening criteria above for each land use
- **Redevelopment Project** - results in a net decrease in total project VMT

If the project does not meet the screening criteria listed above, a detailed VMT analysis is required.

VMT Analysis and Significance Thresholds

If a project is determined to require further VMT analysis after the initial screening, the appropriate VMT analysis methodology is applied per land use type as summarized in **Table 1**. The results of the VMT analysis are compared to the significance thresholds identified for each type of land use also provided in Table 1. If the project is found to have potential significant impacts, mitigation is required.

Mitigation

If the project has a potential significant transportation impact as a result of exceeding the thresholds shown in Table 1, the impacts must be mitigated by reducing the project's resident VMT/capita or employee VMT/employee. Mitigation strategies are intended to reduce the number of automobile trips generated by the project or reduce the average vehicle trip length.

The California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* document or the San Diego Association of Governments (SANDAG) *Mobility Management VMT Reduction Calculator Tool* may be used to quantify percent VMT reductions associated with proposed mitigation strategies.

Bella Mar Project VMT Analysis

The initial screening evaluation for potential VMT impact for the Bella Mar project is summarized in **Table 1**.

Table 1. Bella Mar VMT Analysis: Initial Screening

Screening Criterion	Project Analysis	Pass?
VMT Efficient Location	A screenshot of the screening map at the Project site is provided in **Figure 3**. Based on the screening map, the census tract that contains the Project site (Census Tract 10107) is a VMT efficient area, with 50 to 85 percent of the regional mean VMT per capita. Specifically, the resident VMT per capita for the census tract is 13.7, which is 77.9% of the regional mean.	YES
Small Project	The project generates greater than 300 daily unadjusted driveway trips	No
Locally Serving Retail	Not Applicable	No
Locally Serving Public Facilities	Not Applicable	No
Affordable Housing Project	Provides 100 affordable housing units and provides access to transit via sidewalk connection and new bus stops. The 100 affordable units may be excluded from VMT analysis.	YES
Mixed Use Project	Not Applicable	No
Redevelopment Project	Not Applicable	No

As described in the screening evaluation, the project is located within a VMT Efficient Location per the SANDAG screening map provided in **Figure 3**. The project also provides affordable housing near transit, which would exclude the affordable housing portion of the project from further VMT analysis. As a result, the project is not considered to have significant transportation impacts, and therefore does not require further transportation VMT CEQA analysis.

Conclusion

The City of San Diego's Transportation Study Manual provides a list of screening criteria for land use and transportation projects to determine whether detailed VMT analysis is required. A project would have less than significant transportation impacts per CEQA if the project meets any of the screening criteria.

One of the characteristics in the screening criteria is a residential or commercial project located in a VMT Efficient Location, meaning the area is 15% or more below the base year average household VMT/capita or VMT/employee. Per the manual, the SANDAG screening map was used to determine the VMT/capita for the census tract where the project is located. Based on the SANDAG VMT Screening Tool, the census tract resident VMT per capita is 13.71 which is 77.9% of the regional mean. **As a result, the project is screened out from further VMT analysis, and is presumed to have less than significant transportation impacts per CEQA.**

Figure 1. Project Study Area

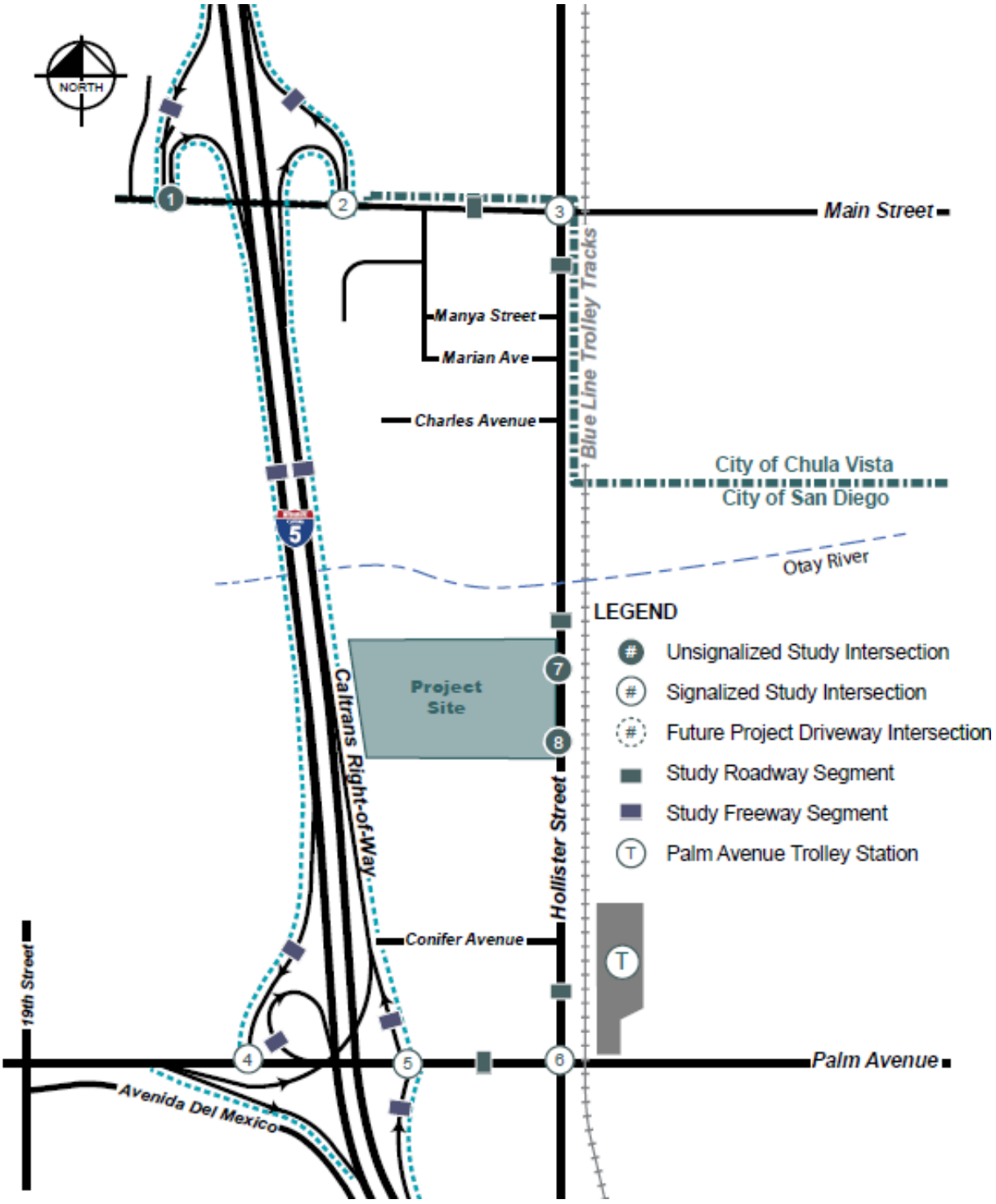
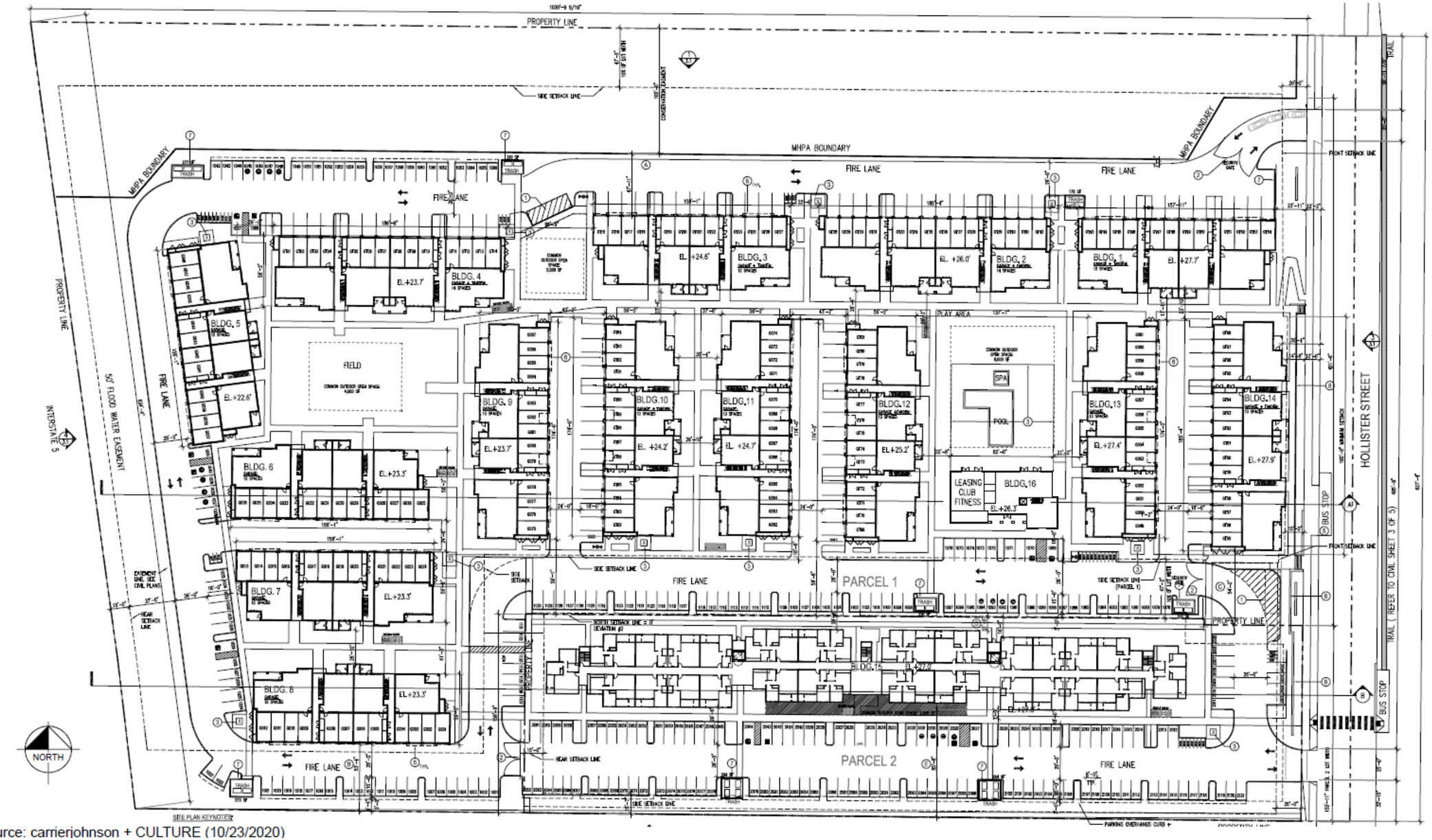
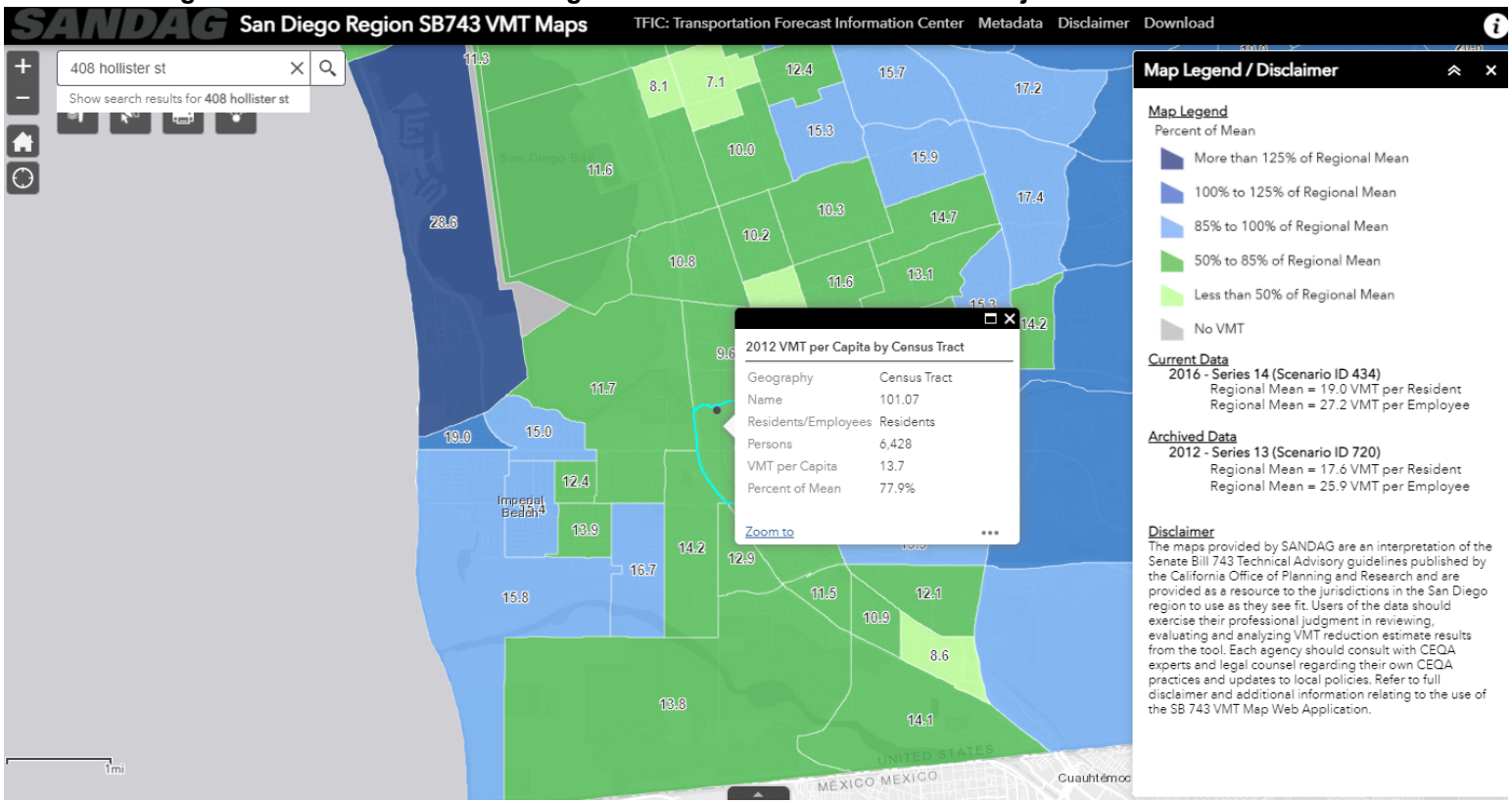


Figure 2. Project Site Plan



Source: carrierjohnson + CULTURE (10/23/2020)

Figure 3. SANDAG VMT Screening Tool – Screenshot of Bella Mar Project Census Tract Location



Attachment A. Significant VMT Thresholds and Analysis Methodologies per Land Use Type

LAND USE TYPE	THRESHOLD FOR DETERMINATION OF A SIGNIFICANT TRANSPORTATION VMT IMPACT **	ANALYSIS METHODOLOGY
Residential	15% below regional average* resident VMT/Capita	**For projects that generate less than 2,400 daily unadjusted driveway trips:** Identify the location of the project on the SANDAG Resident VMT/Capita map. The project's Resident VMT/Capita will be considered the same as the Resident VMT/Capita of the census tract it is located in. Compare the project's Resident VMT/Capita to the threshold to determine if the impact is significant OR input the project into the SANDAG Regional Travel Demand Model to determine the project's Resident VMT/Capita. **For projects that generate greater than 2,400 daily unadjusted driveway trips:** Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's Resident VMT/Capita. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Resident VMT/Capita maps.
Commercial Employment, Hotel	15% below regional average* employee VMT/Employee	**For projects that generate less than 2,400 daily unadjusted driveway trips:** Identify the location of the project on the SANDAG Employee VMT/Employee map. The project's Employee VMT/Employee will be considered the same as the Employee VMT/Employee of the census tract it is located in. Compare the project's Employee VMT/Employee to the threshold to determine if the impact is significant OR input the project into the SANDAG Regional Travel Demand Model to determine the project's Employee VMT/Employee. **For projects that generate greater than 2,400 daily unadjusted driveway trips:** Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's Employee VMT/Employee. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Employee VMT/Employee maps.
Industrial Employment	Regional average* employee VMT/Employee	**For projects that generate less than 2,400 daily unadjusted driveway trips:** Identify the location of the project on the SANDAG Employee VMT/Employee map. The project's Employee VMT/Employee will be considered the same as the Employee VMT/Employee of the census tract it is located in. Compare the project's Employee VMT/Employee to the threshold to determine if the impact is significant OR input the project into the SANDAG Regional Travel Demand Model to determine the project's Employee VMT/Employee. **For projects that generate greater than 2,400 daily unadjusted driveway trips:** Input the project into the SANDAG Regional Travel Demand Model to determine the project's Employee VMT/Employee. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Employee VMT/Employee maps.
Regional Retail, Regional Recreational, Regional Public Facilities, Transportation Projects	Zero net increase in total regional VMT*	Calculate the change to regional VMT using the SANDAG Travel Demand Model. To calculate the change in regional VMT, the regional retail component of the project should be inputted into the travel demand model (year that is used to determine the VMT thresholds). The "with project regional retail" regional VMT produced by the model run is compared to the "no project" regional VMT.

* The regional average and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's Transportation Development Section.
** Projects that exceed these thresholds would have a significant impact.

Source: City of San Diego *Transportation Study Manual Tables 3 and 4 (June 2020)*.