

VEHICLE MILES TRAVELLED ASSESSMENT

SMILAX PROPERTY
County of San Diego, California
July 27, 2020

LLG Ref. 3-19-3067

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VEHICLE MILES TRAVELLED ASSESSMENT

SMILAX PROPERTY

County of San Diego, California

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1.0 INTRODUCTION / PROJECT DESCRIPTION

The report has been prepared to provide a Vehicle Miles Travelled (VMT) Assessment for the proposed Smilax Property project.

The project is located on the west side of Smilax Road, south of SR-78 in the County of San Diego. *Figure 1* shows the general vicinity of the project and *Figure 2* shows a more detailed project area map.

The project proposes to develop the project site with 62 multi-family units and access to the property is proposed via a single driveway to Smilax Road.

Figure 3 shows the conceptual site plan for the project.

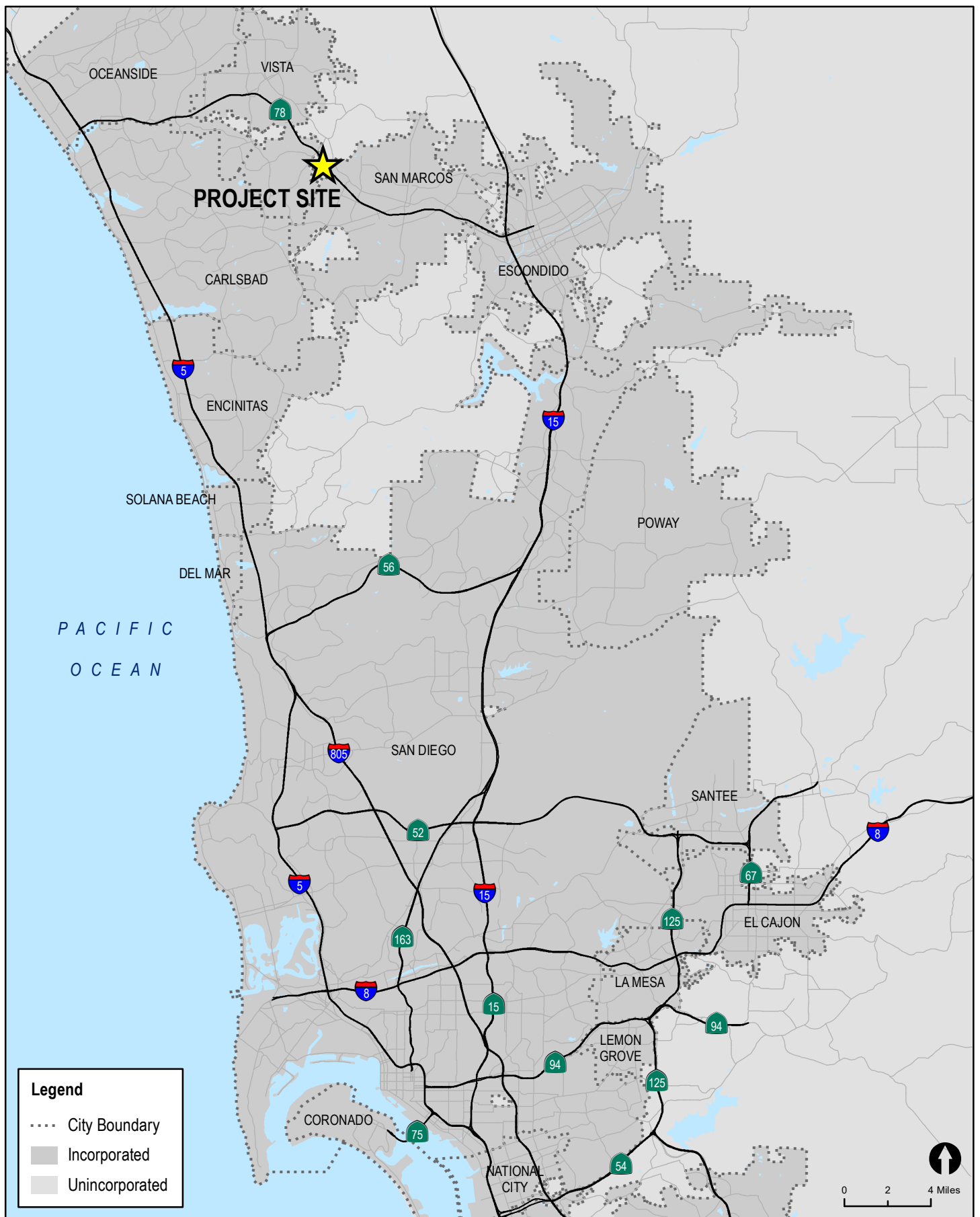


Figure 1

Vicinity Map

SMILAX PROPERTY

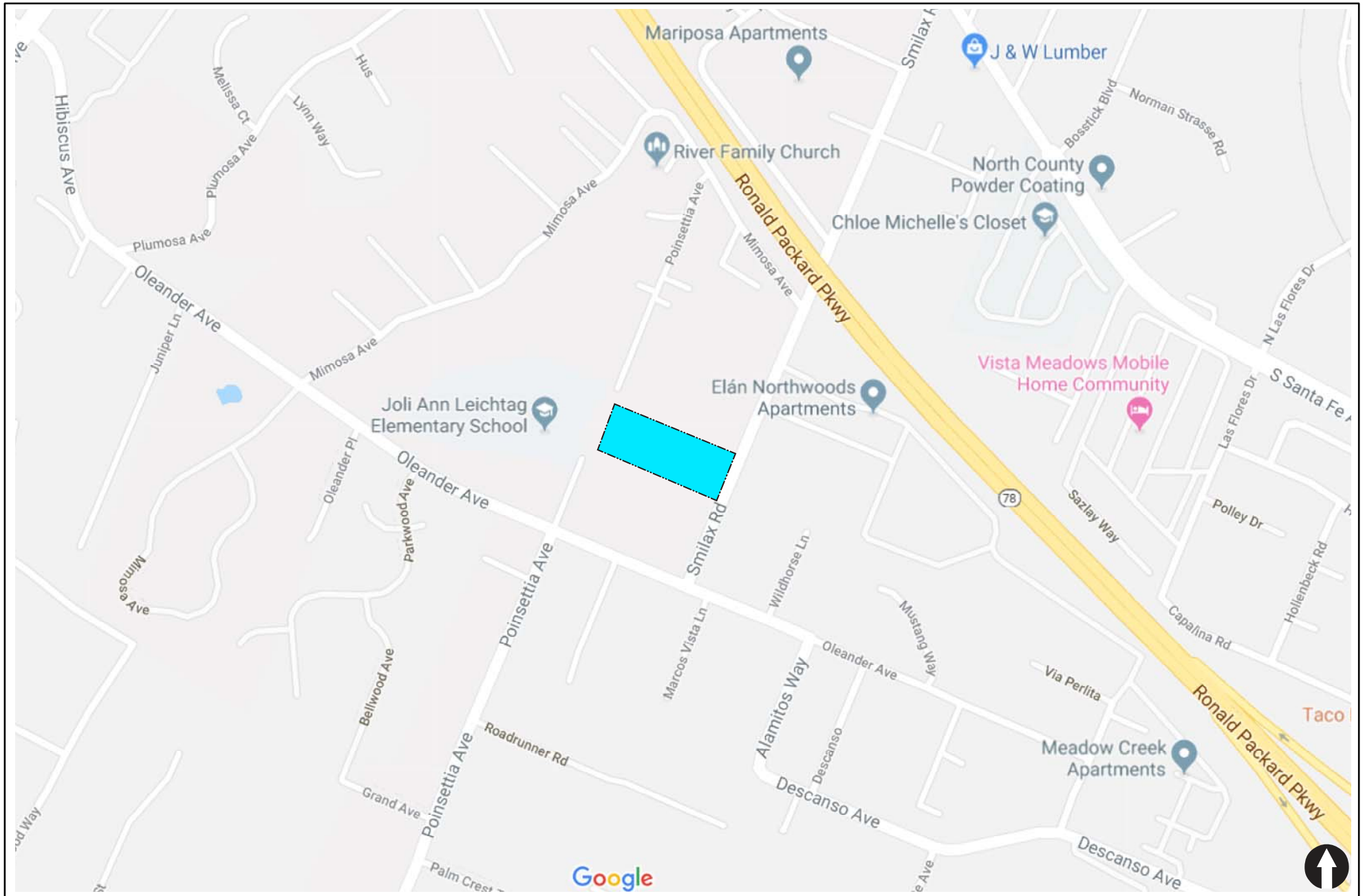
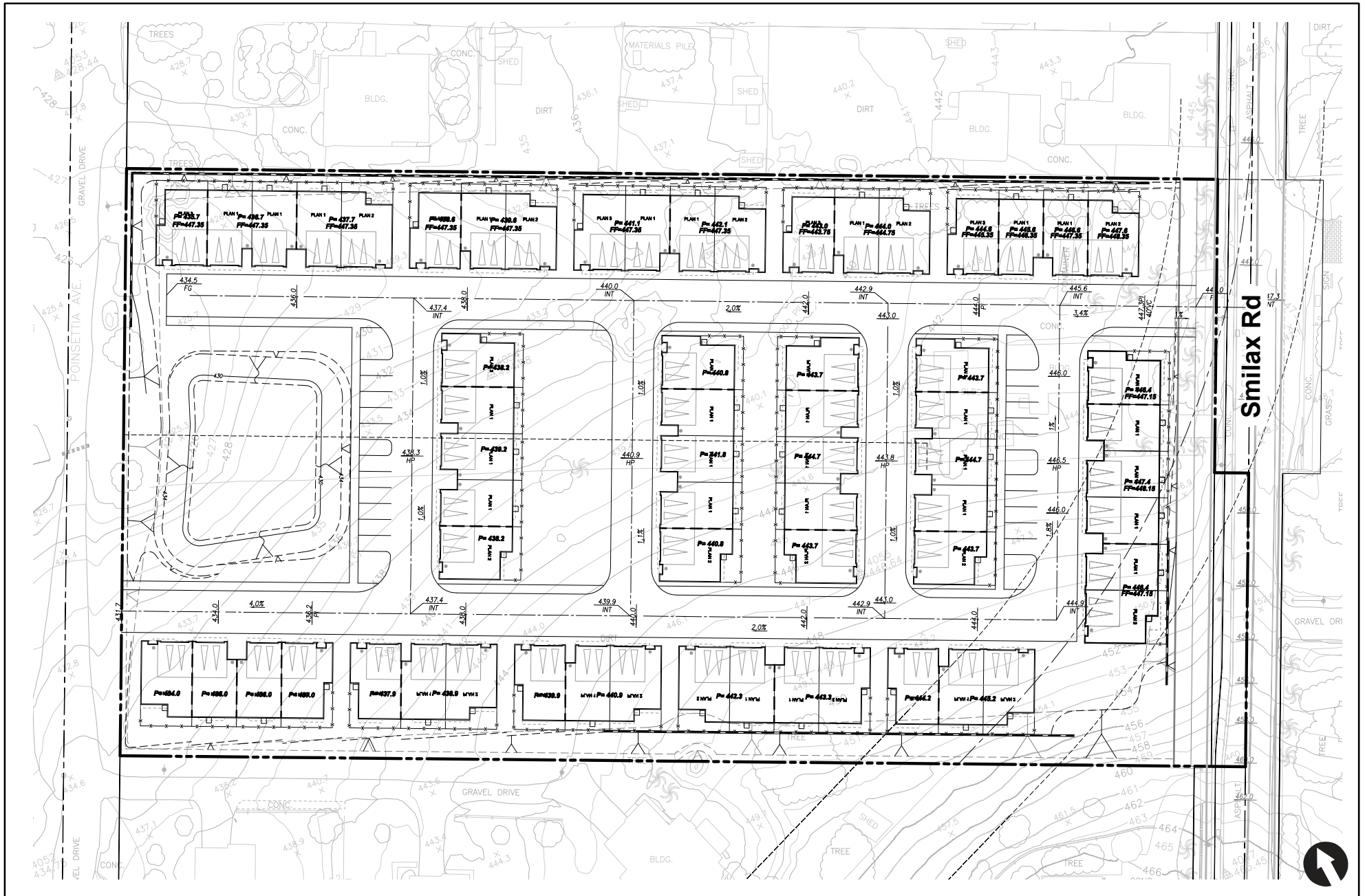


Figure 2

Project Area Map

SMILAX PROPERTY



2.0 COUNTY OF SAN DIEGO TRANSPORTATION GUIDELINES

The County of San Diego has published Draft Transportation Guidelines dated May 2020 and these guidelines are being used to conduct CEQA Transportation studies.

The Board of Supervisors voted on June 24th to adopt the May 2020 Guidelines and selected the “15% below the unincorporated County VMT average” as its threshold. *Appendix A* contains excerpts of the minutes from the June 24th meeting.

Appendix B contains a flow chart from the County Guidelines showing the screening criteria for a CEQA VMT analysis. *Section 3.3.1* of the guidelines provides details regarding the screening criteria. One of the criteria used to determine if a project is screened out is if the project site is located in a VMT efficient area.

“A VMT Efficient Area is an area on the map that modelling data already shows is at least 15% below the unincorporated County VMT average per resident. The unincorporated County VMT average per resident is 32.54. A VMT rate that is 15% below the average is 27.66 VMT per resident.

3.0 ANALYSIS

Appendix C contains maps from the County Guidelines depicting VMT Efficient areas. This appendix also provides a snapshot of the VMT data from a County mapping tool for the project. Both maps show that the project is located in a VMT Efficient area and is therefore screened out of further VMT analysis. “Fifteen percent below the unincorporated County average VMT per resident is 27.66 and the project location has a VMT average of 20.91.”

It should be noted that the project is proposing a General Plan Amendment (GPA) as summarized below:

	<u>GP Designation</u>	<u>Number of Units</u>	<u>Zoning Classification</u>
Current:	VR-2	9 to 10	RR
Proposed:	VR-15	62	RM
VR:	Village Residential		
RR:	Rural Residential		
RM:	Residential Multifamily		

Per OPR guidance and Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).), “a project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact”. Therefore, according to the traffic experts at OPR, the VMT efficiency threshold used herein is the threshold for both a direct transportation impact and cumulative transportation impact.

4.0 CONCLUSIONS

The project site is located in a County determined VMT Efficient area and therefore is screened out of needing to conduct a quantitative VMT analysis. No significant direct or cumulative VMT impact would occur and mitigation measures are not required.

TECHNICAL APPENDICES
SMILAX PROPERTY
County of San Diego, California
July 23, 2020

LLG Ref. 3-19-3067

APPENDIX A

BOARD OF SUPERVISORS MEETING MINUTES, JUNE 24, 2020

**COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
WEDNESDAY, JUNE 24, 2020**

MINUTE ORDER NO. 6

**SUBJECT: NOTICED PUBLIC HEARING:
OPTIONS TO COMPLY WITH SENATE BILL 743 AND IMPLEMENT
VEHICLE MILES TRAVELED IN LOCAL PLANNING AND
ENVIRONMENTAL REVIEW (DISTRICTS: ALL)**

OVERVIEW

In 2013, the State of California passed Senate Bill 743 (SB 743), which changes how jurisdictions, including the County of San Diego (County), analyze transportation impacts from privately- and publicly-initiated projects under the California Environmental Quality Act (CEQA). The CEQA analysis can no longer use road congestion or the amount of time a driver is delayed on the road – commonly measured by level of service (LOS) – when analyzing transportation impacts. SB 743 noted that while automobile delay explains how projects will affect drivers, it does not consider how projects and plans will change the number and length of driving trips and the corresponding effects on the environment. Instead of using LOS, SB 743 identifies Vehicle Miles Traveled (VMT) as the standard to evaluate a project's environmental impacts. VMT measures the amount and distance people drive to destinations. The legislative intent behind SB 743 was to balance the needs of congestion management (traffic) with statewide goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

SB 743 must be implemented by all local jurisdictions no later than July 1, 2020. It applies to any project with a CEQA document that has not been released for public review by July 1, 2020. To assist local jurisdictions in implementing SB 743, the legislature directed the Governor's Office of Planning and Research (OPR) to develop criteria for determining whether transportation impacts of projects are significant under CEQA guidelines. In December 2018, OPR prepared a technical advisory for evaluating the transportation impacts in CEQA as a service to planners, land use officials, and CEQA practitioners. In January 2019, the Natural Resources Agency finalized updates to the CEQA guidelines, including incorporating SB 743 modifications.

Today's recommendations propose transitioning from LOS to VMT in two phases. Phase 1, being considered today, involves consideration by the Board of Supervisors (Board) of a new technical guidance document, the proposed Transportation Study Guide (TSG). The TSG describes the process and procedure for project applicants and their consultants to use when preparing transportation analysis beginning July 1, 2020. The TSG also proposes a methodology to meet a County General Plan requirement for a LOS D (stable flow of traffic) or higher through a Local Mobility Analysis (LMA). Although the LMA would not be part of the CEQA analysis, it provides a methodology to identify impacts to road operations, and safety issues caused by a project, and to ensure adequate transportation infrastructure improvements (widening of a road, traffic signals, etc.) to maintain LOS D with the addition of new projects. While this level of analysis may not affect the environment, it does affect the community in which the project is proposed.

Phase 2, to be considered by your Board in the future, will evaluate options for mitigation programs to address impacts from the VMT analysis. These options include exploring regional mitigation banks, mitigation exchanges, and impact fees. It will also include an analysis of the impact of SB 743 on the

County's Transportation Impact Fee program and the requirement for a LOS D or higher found in Policy M-2.1 of the County General Plan. Phase 2 options will be brought to the Board later this year.

Today's request is for the Board to consider options in addressing changes to the County's CEQA transportation analysis mandated by SB 743, consider a requirement for an LMA, and adopt the draft TSG. This action also includes a suspension of the local component of the Transportation Impact Fee (TIF) for projects subject to VMT analysis, because the current local TIF is based on mitigation of LOS and not VMT impacts.

RECOMMENDATION(S) PLANNING COMMISSION

On May 15, 2020, the County of San Diego Planning Commission considered staff's recommendation to adopt the Transportation Study Guide to establish Vehicle Miles Traveled as a methodology for California Environmental Quality Act (CEQA) transportation analysis in compliance with Senate Bill (SB) 743 and establish a Local Mobility Analysis. The Planning Commission made the following recommendations to the Board of Supervisors:

1. Find that the proposed resolution complies with the CEQA and State and County CEQA Guidelines because the resolution is: (1) not a project as defined in the Public Resources Code section 21065 and CEQA Guidelines section 15378, and is therefore not subject to CEQA pursuant to CEQA Guidelines sections 15060(c); (2) considered ministerial, pursuant to Section 21080(b)(1) of the Public Resources Code, as the County is mandated to comply with Senate Bill 743; (3) separately and independently, categorically exempt pursuant to section 15308 of the CEQA Guidelines because this action will enhance and protect the environment; and (4) subject to the common sense exemption, CEQA Guidelines section 15061(b)(3), because the resolution implements existing law and therefore it can be seen with certainty that there is no possibility that it may have a significant effect on the environment.
2. Recommend that the Board of Supervisors adopt the Resolution: RESOLUTION OF THE COUNTY OF SAN DIEGO BOARD OF SUPERVISORS ADOPTING THE TRANSPORTATION STUDY GUIDE INCLUDING TRANSPORTATION THRESHOLD OF SIGNIFICANCE FOR VEHICLE MILES TRAVELED, DATED JULY 1, 2020, AND SUSPENSION OF LOCAL TRANSPORTATION FEE PURSUANT TO COUNTY CODE 77.216.

DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES

Planning & Development Services concurs with the County of San Diego Planning Commission's recommendations.

FISCAL IMPACT

There is no fiscal impact associated with these recommendations. There will be no change in net General Fund costs and no additional staff years. Vehicle miles traveled impact analysis and mitigations will be implemented through publicly- or privately- initiated projects as those projects are approved and funded. Private development costs will be paid for by the private sector through the entitlement process. Public project costs will be identified during project development and funded in future Operational Plans.

BUSINESS IMPACT STATEMENT

N/A

ACTION 6.1:

A motion was introduced by Supervisor Fletcher to select the following Phase 1 SB 743 Implementation Options for VMT Methodology and Threshold for the Transportation Study Guide (TSG):

1. TSG Component: Significance Threshold
Option A: Establish a Significance Threshold of 15% below the average VMT based on a geographic boundary chosen in decision point 2.
2. TSG Component: Geographic Boundary
Option A. Use the San Diego region (incorporate cities and unincorporated county) to establish average VMT
3. TSG Component: Project Analysis Screening Criteria
Option A: Exclude projects with less than 110 daily vehicle trips.
4. TSG Component: Local Mobility Analysis: Establish the LMA section of the Transportation Study Guide (TSG) component to analyze LOS and ensure consistency with the County's General Plan Goals and Policies.

Motion failed for lack of second.

ACTION 6.2:

ON MOTION of Supervisor Jacob, seconded by Supervisor Gaspar, the Board of Supervisors closed the Hearing and took action as recommended, adopting the following:

1. Found that the proposed resolution complies with the CEQA and State and County CEQA Guidelines because the resolution is: (1) not a project as defined in the Public Resources Code section 21065 and CEQA Guidelines section 15378, and is therefore not subject to CEQA pursuant to CEQA Guidelines sections 15060(c); (2) considered ministerial, pursuant to Section 21080(b)(1) of the Public Resources Code, as the County is mandated to comply with Senate Bill 743; (3) separately and independently, categorically exempt pursuant to section 15308 of the CEQA Guidelines because this action will enhance and protect the environment; and (4) subject to the common sense exemption, CEQA Guidelines section 15061(b)(3), because the resolution implements existing law and therefore it can be seen with certainty that there is no possibility that it may have a significant effect on the environment.
2. Adopted Resolution No. 20-082, entitled: RESOLUTION OF THE COUNTY OF SAN DIEGO BOARD OF SUPERVISORS ADOPTING THE TRANSPORTATION STUDY GUIDE INCLUDING TRANSPORTATION THRESHOLD OF SIGNIFICANCE FOR VEHICLE MILES TRAVELED, DATED JULY 1, 2020, AND SUSPENSION OF LOCAL TRANSPORTATION FEE PURSUANT TO COUNTY CODE 77.216.
3. Adopted the following Phase 1 SB 743 Implementation Options for VMT Methodology and Threshold for the Transportation Study Guide (TSG), as recommended:
 1. TSG Component: Significance Threshold
Adopted Option A: Establish a Significance Threshold of 15% below the average VMT based on a geographic boundary chosen in decision point 2.
 2. TSG Component: Geographic Boundary
Adopted Option B: Use unincorporated county only to establish average VMT.

3. TSG Component: Project Analysis Screening Criteria
Adopted Option A: Exclude projects with less than 110 daily vehicle trips.
4. TSG Component: Local Mobility Analysis: Establish the LMA section of the Transportation Study Guide (TSG) component to analyze LOS and ensure consistency with the County's General Plan Goals and Policies.

AYES: Cox, Jacob, Gaspar, Desmond
NOES: Fletcher

State of California)
County of San Diego) §

I hereby certify that the foregoing is a full, true and correct copy of the Original entered in the Minutes of the Board of Supervisors.

ANDREW POTTER
Clerk of the Board of Supervisors

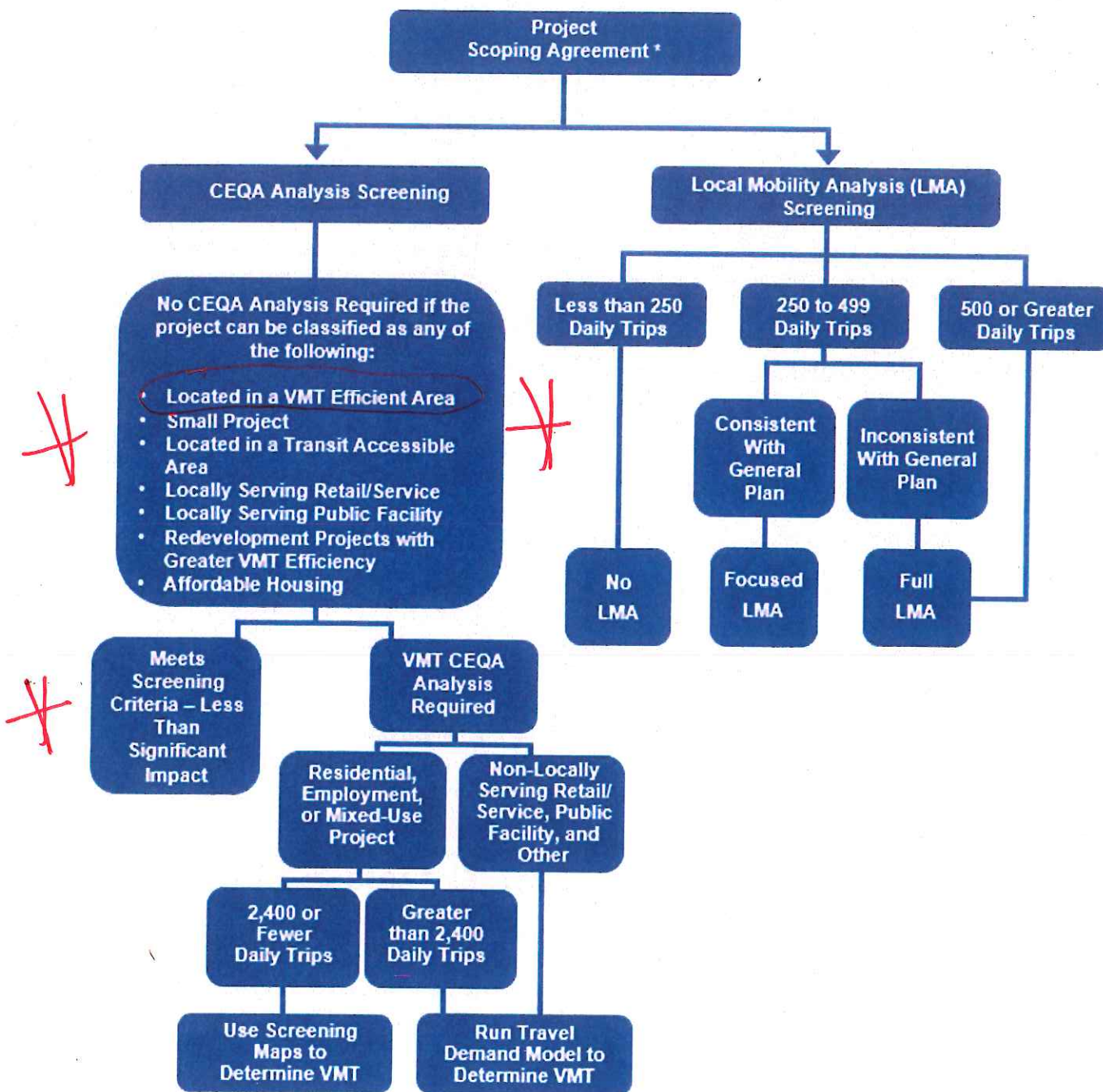


Signed
by Marvice Mazyck, Chief Deputy

APPENDIX B

SCREENING CRITERIA FLOW CHART (COUNTY OF SAN DIEGO TRANSPORTATION GUIDELINES, MAY 2020)

FIGURE 1 – SCOPING FRAMEWORK FOR TRANSPORTATION STUDIES



*A project may require LMA analysis only, CEQA analysis only, LMA and CEQA analysis, or no LMA or CEQA analysis

APPENDIX C

COUNTY OF SAN DIEGO VMT MAPS



