

VEHICLE MILES TRAVELED ASSESSMENT

**TORREY PINES U-STOR-IT
SELF-STORAGE FACILITY**

PTS# 697502

City of San Diego, California

September 2022

LLG Ref. 3-22-3533

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EXECUTIVE SUMMARY

Linscott, Law & Greenspan, Engineers (LLG) has prepared this Vehicle Miles Traveled (VMT) Assessment for the Torrey Pines U-STOR-IT Self-Storage Facility (hereby referred to as the “Project”). The Project (Project #697502) proposes to demolish an existing vacant two-story building and construct a new three-story self-storage building with 166,313 total gross square footage (sf). The Project does not require or propose a Community Plan Amendment or a rezone.

Based on the City of San Diego *Transportation Study Manual (TSM)* (dated September 29, 2020), the Project is required to evaluate transportation impacts under the California Environmental Quality Act (CEQA) using a Vehicle Miles Traveled (VMT) metric, pursuant to guidance from the Governor’s Office of Planning and Research (OPR) in December 2018 (*Technical Advisory on Evaluating Transportation Impacts in CEQA*).

Per Appendix B of the City’s TSM, the proposed Project is an “Industrial / Agricultural Employment” land use. Therefore, the SANDAG Series 14 ABM 2+ (Base Year 2016), VMT per Employee data was reviewed to assess the Project’s VMT. Per the SANDAG Series 14 ABM 2+ (Base Year 2016) screening map, the commute VMT per Employee for Census Tract 83.39 is reported as 25.1 and the regional average commute VMT per Employee is 18.9. Therefore, the Project site is approximately 132.9% of the regional average. Using this data and the screening criteria outlined in the TSM, the Project is not screened out from the requirement to evaluate the VMT attributable to the Project.

The Project falls under the “Industrial / Agricultural Employment” land use type and is calculated to generate 337 average daily trips (ADT). Therefore, per the TSM standards for Industrial or Agricultural Employment projects generating less than 2,400 ADT, the Project’s “VMT per Employee will be considered the same as the VMT per Employee of the census tract in which it is located.”

As stated above, the Project is in a census tract with 25.1 commute VMT per Employee, or 132.9% of the regional average. The Project would have a significant VMT impact based on the significance threshold for an Industrial or Agricultural Employment project of equal to or less than the regional average VMT per Employee. Therefore, mitigation is required to reduce the Project’s VMT impact to the greatest extent feasible.

Although the Project is within the Coastal Overlay Zone and not yet subject to the Complete Communities: Mobility Choices ordinance (effective January 8, 2021 outside the Coastal Zone), the Project has chosen to participate in the City of San Diego’s Complete Communities Mobility Choices Program and will rely upon the Findings and Statement of Overriding Considerations (SOC) from the Complete Communities: Housing Solutions and Mobility Choices Final Program Environmental Impact Report (PEIR) as mitigation to the extent feasible for the Project’s significant unmitigated VMT transportation impact.

The San Diego Municipal Code (SDMC) Ordinance Number O-21274, provides the development regulations for the Mobility Choices portion of the Complete Communities program. According to the ordinance, a site where any of the premises is located either partially or entirely in a TPA is defined as Mobility Zone 2. As stated in *Section 2.1*, the Project is located within a TPA, and is therefore located in Mobility Zone 2. Per SDMC Section 143.1103(b)(1) development in Mobility Zone 2 shall include either VMT reduction Measures totaling at least 5 points per the *Land Development Manual Appendix T (Mobility Choices Regulations: Implementation Guidelines)* or payment of the Active Transportation In Lieu Fee per SDMC Section 143.1103(b)(5).

The Project will pay the “Active Transportation In Lieu”, to be established during the building permit review phase. Therefore, the Project will mitigate its significant VMT transportation impact to the extent feasible by opting in to the Mobility Choices program regulations and relying upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR.

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VEHICLE MILES TRAVELED ASSESSMENT

TORREY PINES U-STOR-IT SELF-STORAGE FACILITY

San Diego, California

September 2022

1.0 INTRODUCTION

Linscott, Law & Greenspan, Engineers (LLG) has prepared this Vehicle Miles Traveled (VMT) Assessment for the Torrey Pines U-STOR-IT Self-Storage Facility (hereby referred to as the “Project”). The Project (PTS #697502) proposes to demolish an existing vacant two-story building and construct a new three-story self-storage building with 166,313 total gross square footage (sf). The Project does not require or propose a Community Plan Amendment or a rezone.

This VMT Assessment has been prepared to evaluate the effects of the Project using VMT, as proposed by the California Governor’s Office of Planning and Research (OPR) to implement California State Law Senate Bill (SB) 743. The analysis methodology contained in this report utilizes the City of San Diego’s latest *Transportation Study Manual* (September 2020).

The report is organized as follows:

<i>Section 1.0</i>	Introduction
<i>Section 2.0</i>	Project Description and Trip Generation
<i>Section 3.0</i>	Report Approach
<i>Section 4.0</i>	VMT Significance Criteria & Methodology
<i>Section 5.0</i>	Project VMT Assessment
<i>Section 6.0</i>	VMT Impact Summary and Mitigation

2.0 PROJECT DESCRIPTION

2.1 Project Location

The Project site is located at 11391 Sorrento Valley Road, in the Torrey Pines Community Plan area within a Transit Priority Area (TPA) and the IL-3-1 zone. A vacant two-story building is currently developed on the Project site.

Regional access to the site is provided via Interstate 5 (I-5), Interstate 805 (I-805), Sorrento Valley Boulevard and Sorrento Valley Road.

Figure 2–1 shows the vicinity map. *Figure 2–2* shows a more detailed Project area map.

2.2 Project Description

The Project proposes to demolish an existing vacant two-story building and construct a new three-story self-storage building with 166,313 total gross sf. Direct access to the site would be via an existing driveway from Sorrento Valley Road.

Figure 2–3 depicts the conceptual site plan.

2.3 Project Trip Generation

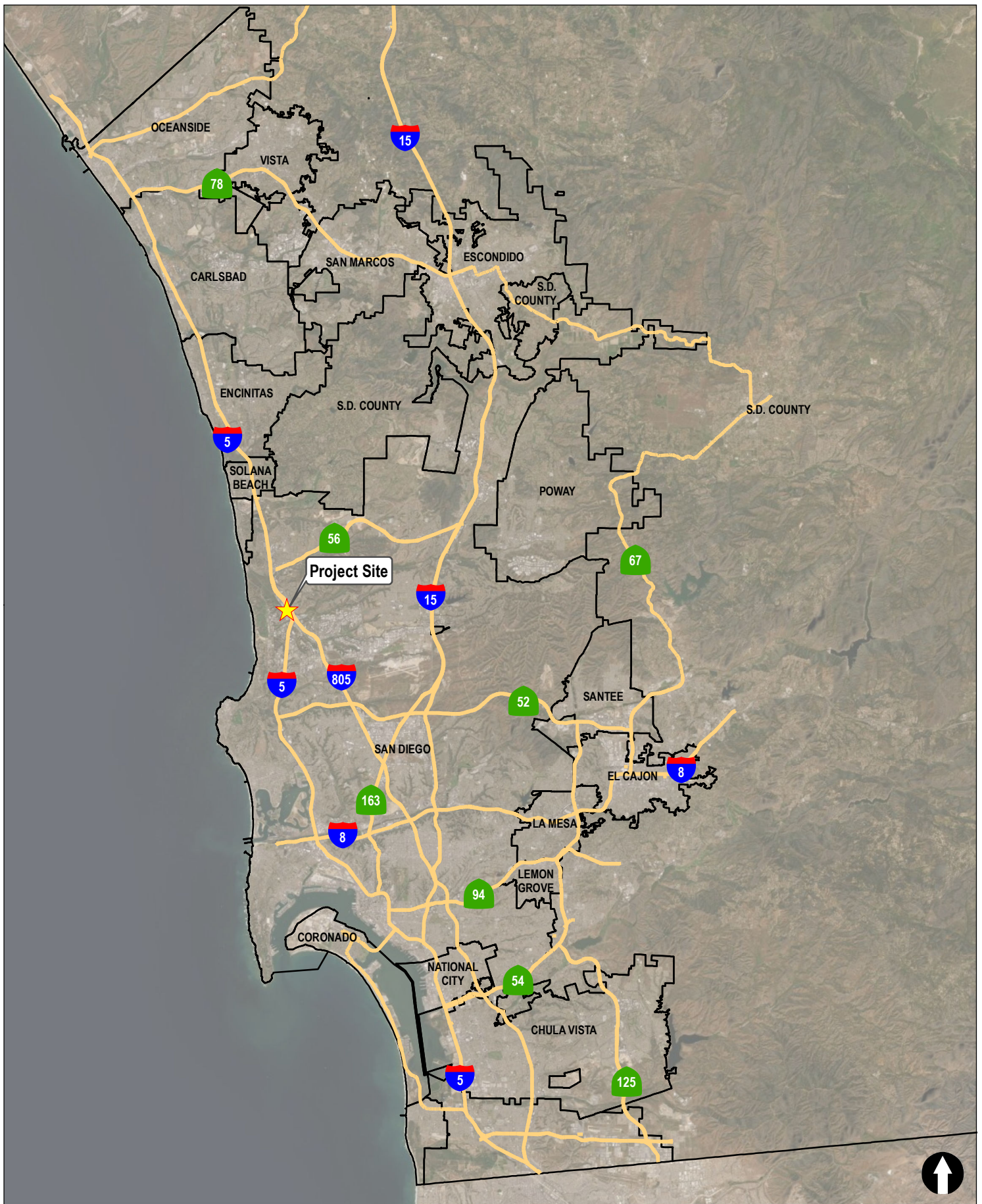
The “Rental Storage” trip generation rates from the City of San Diego’s *Trip Generation Manual* (May 2003), were applied to the proposed Project. *Table 2–1* summarizes the Project trip generation. As shown in *Table 2–1*, the Project is estimated to generate 337 ADT with 20 AM peak hour trips (10 inbound/ 10 outbound) and 30 PM peak hour trips (15 inbound/ 15 outbound).

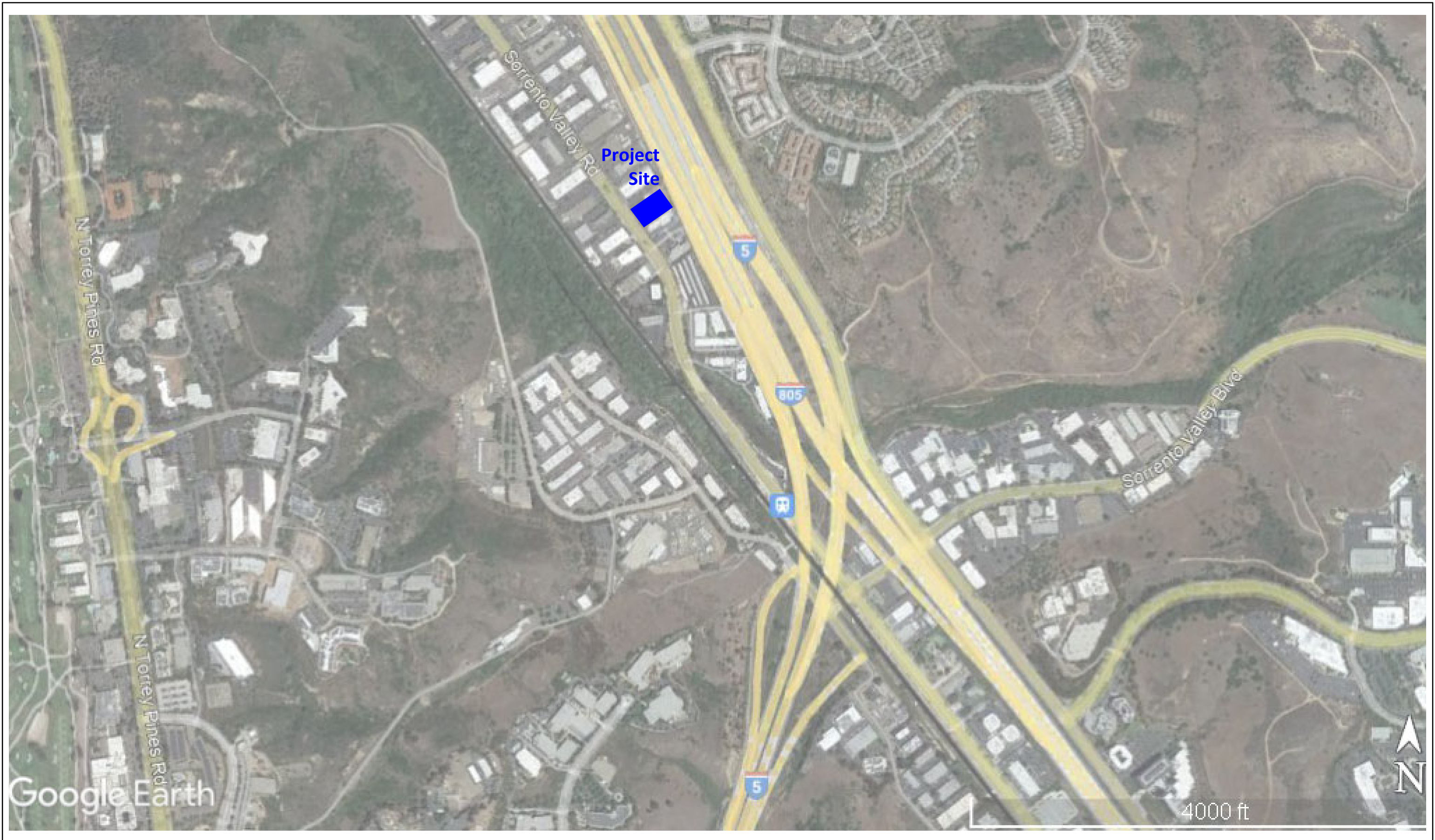
**TABLE 2-1
PROJECT TRIP GENERATION**

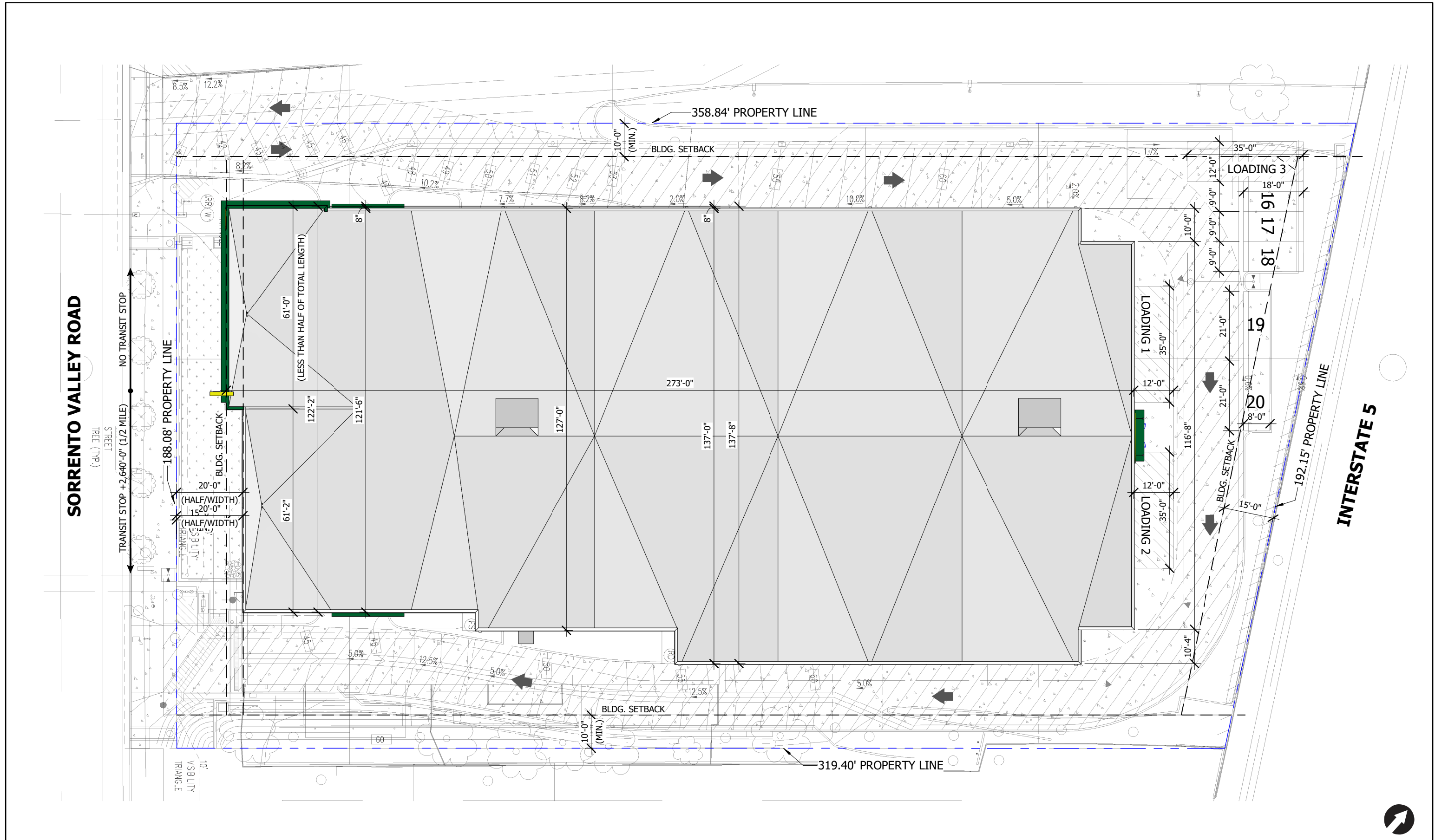
Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour						PM Peak Hour					
		Rate ^a	Volume	% of ADT ^b	In:Out		Volume			% of ADT ^a	In:Out		Volume		
					Split ^a		In	Out	Total		Split ^a		In	Out	Total
Self-Storage Facility	166,313 SF	2/KSF	333	6%	50%	50%	10	10	20	9%	50%	50%	15	15	30

Footnotes:

- a. Rates taken from the *City of San Diego Trip Generation Manual*.
- b. ADT = Average daily traffic volumes







3.0 REPORT APPROACH

3.1 VMT Background

Vehicle Miles Traveled (VMT) is defined as the “amount and distance of automobile travel attributable to a project” per CEQA Guidelines Section 15064.3. VMT is a measure of the use and efficiency of the transportation network as well land uses in a region. VMT is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (roundtrip) travel and is estimated for a typical weekday for the purposes of measuring transportation impacts.

3.2 Vehicle Miles Traveled

The potential transportation impacts of the proposed Project are based on VMT to satisfy the California Environmental Quality Act (CEQA) guidelines through SB 743. Public Resources Code section 20199, enacted pursuant to SB 743, identifies VMT as an appropriate metric for measuring transportation impacts along with the elimination of auto delay/Level of service (LOS) for CEQA purposes statewide, effective July 1, 2020. The justification for this paradigm shift is that auto delay/LOS impacts may lead to improvements that increase roadway capacity and therefore sometimes induce more traffic and greenhouse gas emissions. In contrast, constructing projects in VMT-efficient locations assists California in meeting greenhouse gas emissions targets. Therefore, consistent with SB 743 and CEQA Guidelines 15064.3, the CEQA significance determination for the Project is based only on VMT and not on LOS.

4.0 VMT SIGNIFICANCE CRITERIA & METHODOLOGY

4.1 Local / Regional Agency Transition to SB743

A *Transportation Study Manual* (TSM) has been published by the City of San Diego on September 29, 2020 and was adopted by City Council on November 9, 2020 as part of the Complete Communities: Mobility Choices program.

Given that the City of San Diego has developed significance thresholds and technical methodologies, the TSM (September 2020) was utilized for this report.

4.2 Significance Criteria

According to the City of San Diego's TSM, the transportation VMT thresholds of significance are shown in **Table 4-1**. Per Appendix B of the City's TSM, the proposed Project is an "Industrial / Agricultural Employment" land use. Therefore, the VMT/Employee threshold applies as shown below.

**TABLE 4-1
VMT SIGNIFICANCE THRESHOLDS**

Land Use Type ¹	Thresholds for Determination of a Significant Transportation VMT Impact ²
Industrial and Agricultural Employment	Regional average ³ VMT/Employee

Source: Table 3: Transportation VMT Thresholds of Significance by Land Use per the TSM, September 2020

Footnotes:

1. See *Appendix B* of the TSM for specific land use designations.
2. Projects that exceed these thresholds would have a significant impact.
3. The regional average and total regional VMT are determined using the SANDAG Regional Travel Demand Model.

4.3 Technical Methodology

The technical approach for the Project is broken into the following two components.

- City of San Diego Screening Criteria
- VMT Analysis Methodology

4.3.1 City of San Diego Screening Criteria

According to the TSM, a project that meets at least one of the following screening criteria would have less than significant VMT impact due to project characteristics and/or location.

1. **Residential or Commercial Project Located in a VMT Efficient Area:** The project is a residential or commercial employment project located in a VMT efficient area (15% or more below the base year average household VMT/capita or VMT/employee) based on the applicable location-based screening map produced by SANDAG.
2. **Industrial or Agricultural Project Located in a VMT Efficient Area:** The project is an industrial employment or agricultural employment project located in VMT efficient area (in

an area with average or below average base year VMT/employee) based on the applicable location-based screening map produced by SANDAG.

3. **Small Project:** The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.
4. **Locally Serving Retail/Recreational Project:** The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the San Diego Municipal Code Land Development Code Trip Generation Manual. Locally serving recreation is consistent with the land uses listed in Appendix B of the *TSM*, given that it meets the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is **not** screened out.
5. **Locally Serving Public Facility:** The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
6. **Affordable Housing:** The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per San Diego Municipal Code Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with ten deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the ten affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).
7. **Mixed-Use Project Screening Considerations:** The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened

out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.

8. **Redevelopment Project Screening Considerations:** The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts per *Table 3* of the *TSM*.

4.3.2 Analysis Methodology

If a project is not screened out using City criteria, the following methodology for evaluating the VMT attributable to a project should be performed. Per the *TSM*, for Industrial or Agricultural Employment projects generating less than 2,400 ADT, the project's VMT per Employee will be considered the same as the VMT per Employee of the census tract it is located in. SANDAG provides base year 2016 VMT data using the SANDAG Series 14 ABM 2+ model. By utilizing the SANDAG screening map, the VMT per Employee can be observed at both the regional and census tract level.

Table 4–2 further details the SANDAG methodology based on the land use per the *TSM*.

**TABLE 4–2
TRANSPORTATION VMT ANALYSIS METHODOLOGY BY LAND USE**

Land Use Type	Analysis Methodology
Industrial or Agricultural Employment	<p>For projects that generate less than 2,400 daily unadjusted driveway trips: Identify the location of the project on the SANDAG VMT per Employee map. The project's VMT per Employee will be considered the same as the VMT per Employee of the census tract in which it is located. Compare the project's VMT per 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 VMT per Employee.</p> <p>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 VMT per Employee. To perform the analysis, all project land uses should be inputted, and the VMT per Employee should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG VMT per Employee maps.</p>

Source: City of San Diego TSM (September 2020) Table 4: Transportation VMT Analysis Methodology by Land Use

5.0 PROJECT VMT ASSESSMENT

5.1 TSM Screening Assessment

Based on the screening criteria described in *Section 4.3.1*, the Project is not screened out from the requirement to conduct a VMT analysis as detailed below. *Table 5–1* summarizes the Project applicability of the TSM screening criteria.

**TABLE 5–1
VMT SCREENING CRITERIA – PROJECT APPLICABILITY**

Screening Criteria ¹	Applicable to the Project?	Project Screen out?
1. Residential or Commercial Project Located in a VMT Efficient Area	No	—
2. Industrial or Agricultural Project Located in a VMT Efficient Area	Yes	No
3. Small Project	No	—
4. Locally Serving Retail/Recreational Project	No	—
5. Locally Serving Public Facility	No	—
6. Affordable Housing	No	—
7. Mixed-Use Project Screening Considerations	No	—
8. Redevelopment Project Screening Considerations	No	—

Footnotes:

1. According to the *TSM*, September 2020.

Screening Criteria 2:

Industrial or Agricultural Project Located in a VMT Efficient Area: “The project is an industrial employment or agricultural employment project located in VMT efficient area (in an area with average or below average base year VMT per Employee) based on the applicable location-based screening map produced by SANDAG.

Result:

Per the SANDAG Series 14 ABM 2+ (Base Year 2016) screening map, the commute VMT per Employee for Census Tract 83.39 is shown as 25.1 and the regional average commute VMT per Employee for comparison is 18.9. Therefore, the Project site is approximately 132.9% of the regional average. Using this data, the Project does not screen out from the requirement to conduct a VMT analysis. *Appendix A* contains excerpts of the SANDAG screening map.

5.2 Project VMT Assessment

Since the Project did not satisfy the above screening criterion, it must evaluate the VMT produced by the Project. As shown in *Table 4–1* earlier in this report, the Project is considered an “Industrial / Agricultural Employment” land use type. As shown in *Table 2–1*, the Project is calculated to generate 327 average daily trips (ADT). Therefore, per the TSM standards, the Project ‘s “VMT per

Employee will be considered the same as the VMT per Employee of the census tract in which it is located.” Per the current SANDAG VMT screening maps (Series 14 ABM 2+ Base Year 2016) available on the website, the Project site is located in Census Tract 83.39 with a commute VMT per Employee of 25.1. The regional average commute VMT per Employee is 18.9 miles. The Project’s VMT per Employee is 132.9% of the regional average. The Project would therefore have a significant VMT impact based on the significance threshold for an Industrial or Agricultural Employment project of equal to or less than the regional average VMT per Employee.

Table 5–2 shows the results of the VMT assessment comparison.

**TABLE 5–2
PROJECT VMT FINDINGS**

Scenario	Regional Baseline VMT (miles)	Significance Threshold (miles)	Project VMT per Employee (miles)	Percentage of Regional Average	Transportation Impact? (Over Threshold)
Proposed Project	18.9	18.9	25.1	132.9%	Yes

6.0 VMT IMPACT SUMMARY AND MITIGATION

The Project was determined to have a significant VMT impact using the methodology applied from the City of San Diego *TSM*, September 2020. The Project's commute VMT per Employee was determined to be 25.1, which is 132.9% of the regional average commute VMT per Employee of 18.9 miles. Therefore, mitigation is required to reduce the Project's VMT impact to the greatest extent feasible.

Although the Project is within the Coastal Overlay Zone and not yet subject to the Complete Communities: Mobility Choices ordinance (effective January 8, 2021 outside the Coastal Zone), the Project has chosen to participate in the City of San Diego's Complete Communities Mobility Choices Program and will rely upon the Findings and Statement of Overriding Considerations (SOC) from the Complete Communities: Housing Solutions and Mobility Choices Final Program Environmental Impact Report (PEIR) as mitigation to the extent feasible for its significant unmitigated VMT transportation impact.

The San Diego Municipal Code (SDMC) Ordinance Number O-21274, provides the development regulations for the Mobility Choices portion of the Complete Communities program. According to the ordinance, a site where any of the premises is located either partially or entirely in a TPA is defined as Mobility Zone 2. As stated in *Section 2.1*, the Project is within a TPA and is therefore located in Mobility Zone 2. Per SDMC Section 143.1103(b)(1) development in Mobility Zone 2 shall include either VMT reduction measures totaling at least 5 points per the *Land Development Manual Appendix T (Mobility Choices Regulations: Implementation Guidelines)* or payment of the Active Transportation In Lieu Fee per SDMC Section 143.1103(b)(5).

The Project will pay the "Active Transportation In Lieu Fee", to be established during the building permit review phase. Therefore, the Project will mitigate its significant VMT transportation impact to the extent feasible by opting in to the Mobility Choices program regulations and by relying upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR.

TECHNICAL APPENDICES
**TORREY PINES U-STOR-IT
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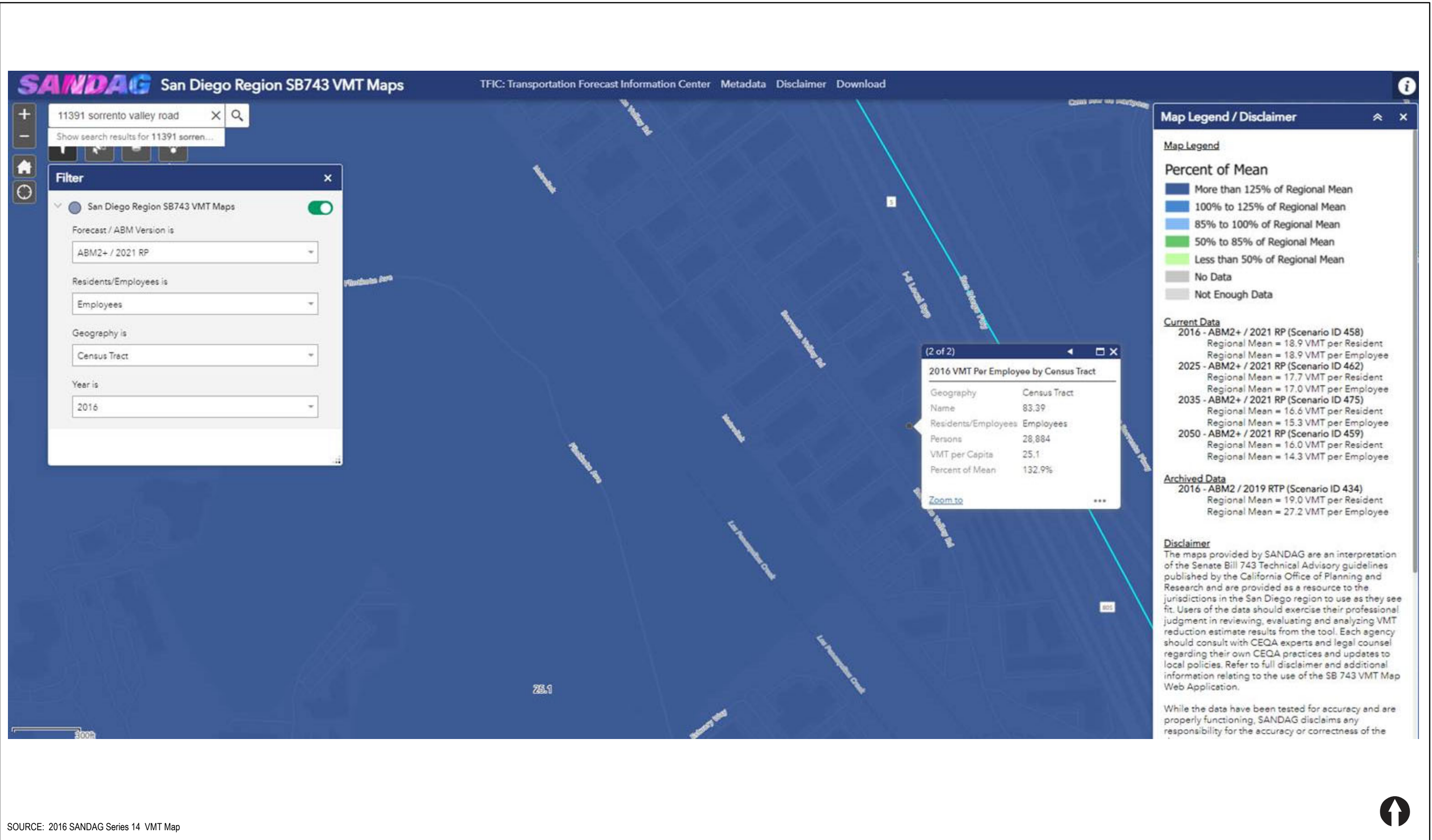
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APPENDIX A

EXCERPT FROM SANDAG SB 743 SERIES 14 ABM 2+ BASE YEAR 2016 VMT MAP



SOURCE: 2016 SANDAG Series 14 VMT Map