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SUBJECT: *ARE Scripps Health Headquarters (PTS 686158) - VMT
Assessment Memo*

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The purpose of this memo is to discuss the Vehicle Miles Traveled (VMT) Assessment for the proposed project in accordance with the methodology provided in the City of San Diego Transportation Study Manual (September 29, 2020).

Project Description:

The ARE Scripps Health Headquarters Project is located on a 3.79-acre lot consisting of two parcels that are located at 4555 Executive Drive and 9291 Executive Way in the University Community Planning Area. The project site is currently developed with one (1) building supporting the San Diego Braille Institute consisting of a building area of 30,221 SF. The Project is bound to the north by Executive Drive, to the west by Executive Way, to the south by an Embassy Suites parking structure, and to the east by Devonshire Woods residential complex.

Regional access to the site is provided by the junctions of Interstate 5 with Genesee Avenue (1.5 miles path-of-travel-distance away from the project site), the junction of Interstate 805 with La Jolla Village Drive (0.6 miles path-of-travel-distance away from the project site), and the junction of Interstate 5 with La Jolla Village Drive (1.2 miles path-of-travel- distance away from the project site). Direct access to the project site would occur along Executive Drive and Executive Way.

The project site is designated as an industrial IP-1-1 zone. The site is located in the University Community Planning Area and is zoned with a Residential Base RS-1-14 zone.

The Project proposes to redevelop the site through the demolition of the Braille Institute building consisting of approximately 30,221 SF of educational uses and the construction of two one (1) five-story corporate headquarters/single-tenant building supporting 131,183 SF of building area with a full basement consisting of 25,522 SF (non-trip generating space that includes 10,000 SF of amenities, such as a 2,005 SF fitness space, a 500 SF locker/shower/toilet space,, and 15,522 SF of parking area for 34 vehicles). The project will also construct a four- story parking structure of 131,183 SF of area. Discretionary actions associated with the proposed Project

Consist of a Neighborhood Development Permit (NDP). The anticipated Opening Day of the project is estimated to be during Year 2023.

Please refer to **Figure 1** for a project location map.

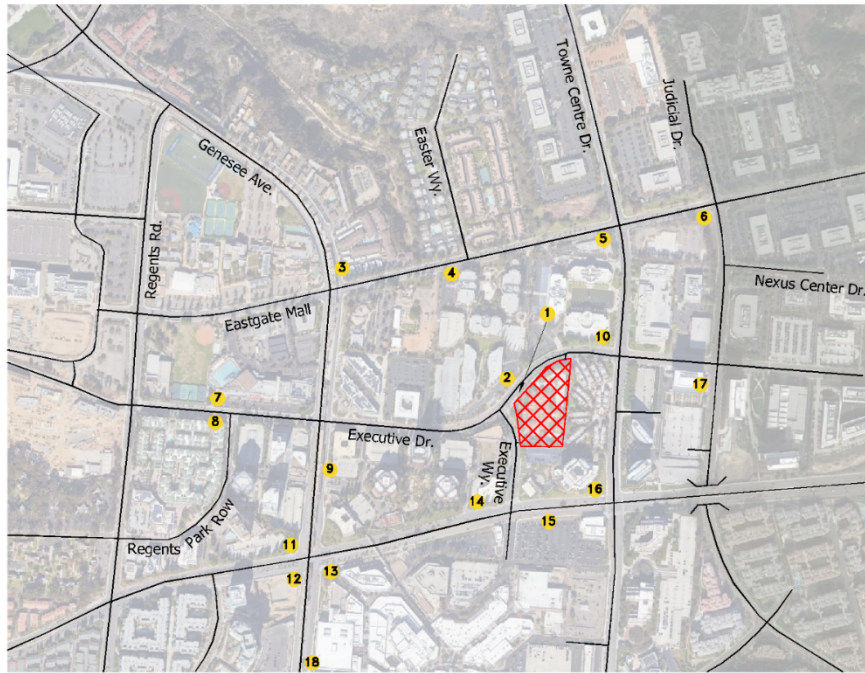
VMT Assessment:

The City of San Diego provides guidance for the determination and evaluation of significant transportation VMT impacts resulting from a land development project. The City of San Diego Transportation Study Manual (TSM; dated *September 29th, 2020*) presents the guidelines for the analysis of CEQA Transportation VMT requirements which include screening criteria, significance thresholds, analysis methodology, and mitigation.



Screening Assessment:

As specified in the City of San Diego's TSM, the requirements to prepare a detailed transportation VMT analysis applies to all land development projects, except for those projects that meet at least one of the screening criteria listed below:

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 VMT per Capita or VMT per 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 Employee VMT per 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 land uses are listed in Appendix B of the TSM, if they meet 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 locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is 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 (located within a reasonable walking distance of ½ mile from the project site) 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 identified 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.



Legend

-  = Project Location
-  = Transit Stop Locations (Within 1/2 Mile Walking Distance of Project Site)



ID	Transit Stop Location	Walking Distance from Project Site	Route(s)
1	SE corner of Executive Dr. / Executive Wy.	0.08 mi.	204
2	NE corner of Executive Dr. / Executive Wy.	0.08 mi.	204
3	NE corner of Genesee Ave. / Eastgate Mall	0.46 mi.	979
4	SW corner of Eastgate Mall / Easter Wy.	0.46 mi.	979
5	SW corner of Eastgate Mall / Towne Centre Dr.	0.23 mi.	979
6	SW corner of Eastgate Mall / Judicial Dr.	0.36 mi.	204
7	NW corner of Executive Dr. / Regenes Park Row	0.421 mi.	201
8	SW corner of Executive Dr. / Regenes Park Row	0.42 mi.	202
9	*Executive Station (Mid-Coast Trolley) - future facility	0.30 mi.	Blue Line
10	NW corner of Executive Dr. / Towne Centre Dr.	0.08 mi.	979
11	NW corner of La Jolla Village Dr. / Genesee Ave.	0.43 mi.	30/41/237/921
12	SW corner of La Jolla Village Dr. / Genesee Ave.	0.41 mi.	30/31/41/60/921
13	SE corner of La Jolla Village Dr. / Genesee Ave.	0.36 mi.	30/60/237/921
14	NW corner of La Jolla Village Dr. / Executive Wy.	0.11 mi.	31/60/921
15	SE corner of La Jolla Village Dr. / Executive Wy.	0.14 mi.	31/60/921
16	NW corner of La Jolla Village Dr. / Towne Centre Dr.	0.19 mi.	31/60/921
17	SW corner of Executive Dr. / Judicial Dr.	0.22 mi.	204
18	NE corner of Genesee Ave. / Esplanade Ct.	0.50 mi.	41

Notes: * = Major Transit Stop

For example, if the project is 100 units with 10 deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the 10 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.

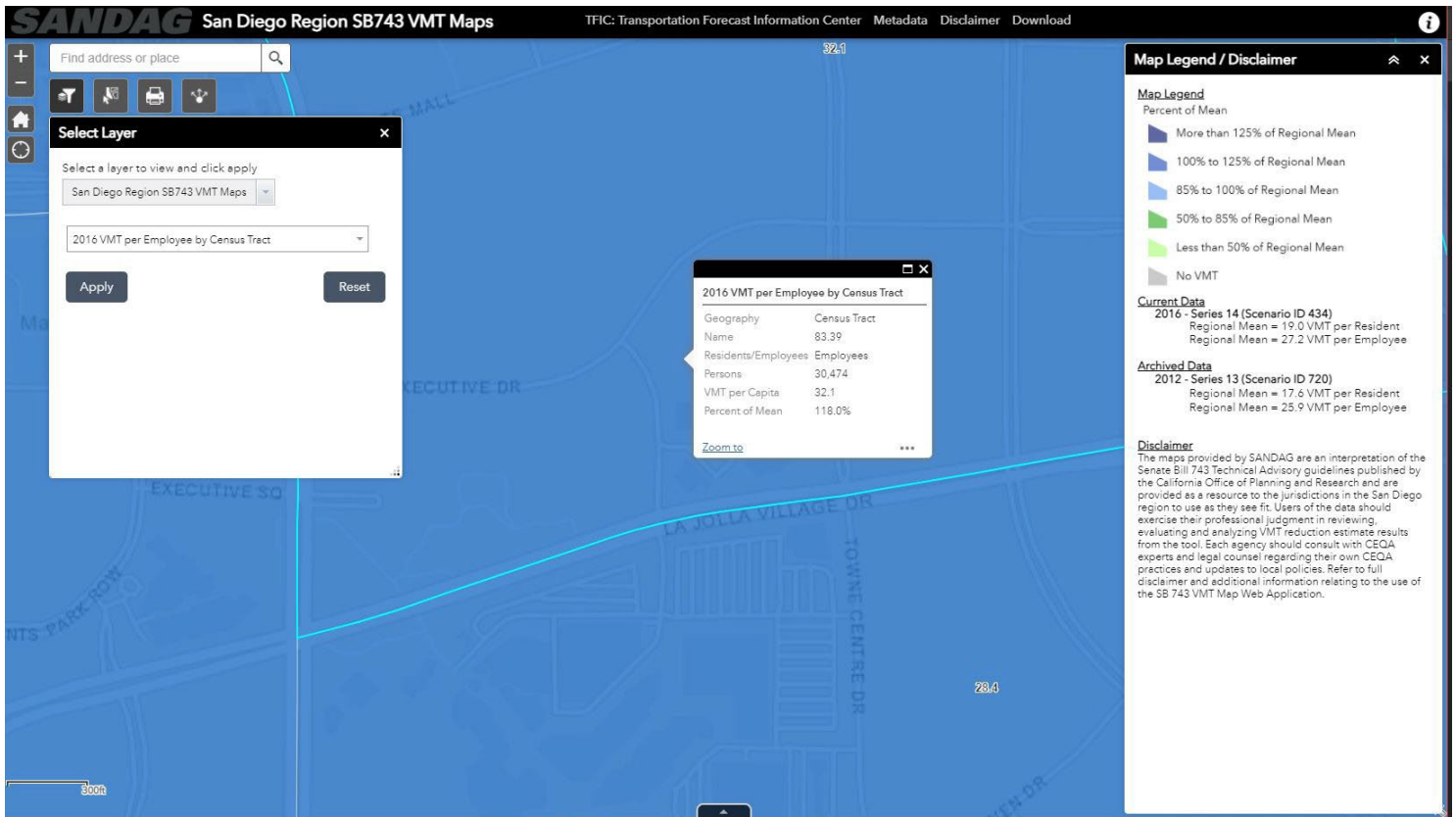
8. Redevelopment Project Screening Considerations: The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed-restricted or other types of affordable 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.

The screening assessment below evaluates the project with applicable Screening Criteria.

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 resident VMT per Capita or employee VMT per Employee) based on the applicable location-based screening map produced by SANDAG.

- Appendix B of the City of San Diego TSM provides a land-use type categorization for specific land-use designations. The proposed project's land use designation as a corporate headquarters/single tenant office is categorized as a Commercial Employment land-use type.
- The project, as a Commercial Employment land use, has been evaluated using the SANDAG current base year screening map (Series 14, Year 2016) included in **Figure 2**. As shown in the screening map, the regional mean Employee VMT per employee is 27.2 miles per employee. The project is located in Census Tract 83.39 in which the Employee VMT per employee is 32.1; which is 118.0% of the regional average. Therefore, the project is not located within a VMT efficient area and would not be screened out of having to perform a VMT analysis.

Figure 2: SANDAG VMT Base Screening Map (Series 14 Year 2016)



Significance Determination:

Since the projects did not meet any of the screening criteria, it must evaluate the VMT produced by the project. The proposed commercial employment project is expected to generate approximately 1,312 daily unadjusted driveway trips and therefore, the project's Employee VMT/Employee will be considered the same as the VMT per employee of the census tract it is located within. As stated above, the project is within a census tract with 32.1 Employee VMT/Employee, which is 118.0% of the regional mean.

The significance thresholds and specific VMT metrics used for different types of land uses are shown in **Table 1** (*Table 3 from the City of San Diego TSM*) below. Therefore, the proposed project would have a significant transportation VMT impact based on the significance threshold for a commercial employment project of 15% below the regional mean VMT per employee. Additionally, mitigation is required to reduce the project's VMT impact to the greatest extent feasible.

Mitigation:

The Project is required to comply with the Complete Communities: Mobility Choices ordinance (effective January 8, 2021 outside the Coastal Zone) 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; *May 2020*)(SCH No. 2019060003) as mitigation to the extent feasible for its significant unmitigated VMT impact.

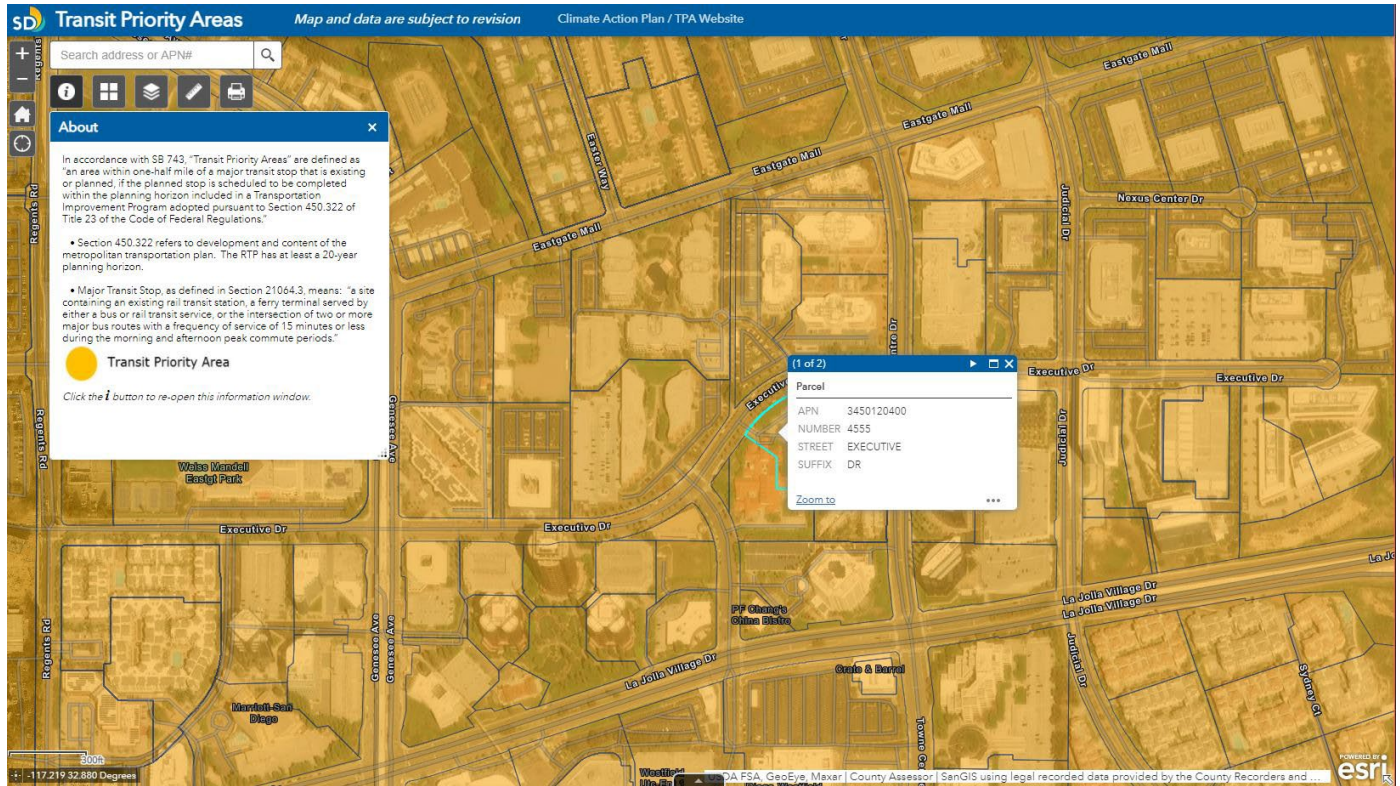
As shown in **Figure 3**, the Project site is entirely located within an existing Transit Priority Area (TPA).

The SDMC Ordinance Number O-21274 (*12/9/2020*) provides the development regulations for the Mobility Choices portion of the Complete Communities program. As defined in SDMC Section 143.1103, a site where any of the premises is located either partially or entirely in a Transit Priority Area is defined to be a Mobility Zone 2 area. Since the project is located within a TPA as described above, the Project is defined as an area designated as Mobility Zone 2.

SDMC Section 143.1103(b) indicates the requirement for the application of 5 points of VMT Reduction Measures for all development (outside the Coastal Overlay Zone) located within a Mobility Zone 2 in accordance with the *Land Development Manual Appendix T*. The Land Development Manual Appendix T provides a list of VMT Reduction Measures that are split into a series of categories, which include Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each of the individual measures is given an assigned point value per unit of measure.

For development in Mobility Zone 2, SDMC Section 143.1103(b)(1) identifies the requirement to provide VMT Reduction Measures totaling at least 5 points. Alternatively, SDMC Section 143.1103(b)(5) provides the option for the applicant to pay the Active Transportation In Lieu Fee referenced in SDMC Section 143.1103(c).

Figure 3: Transit Priority Area Map



Description of Mobility Choices Measure	Points Credited towards Compliance
(S) Provide an on-site bicycle repair station	1.5
(S) Provide carpool parking spaces, at least 10% beyond minimum requirements <ul style="list-style-type: none"> • Carpool parking required = 42 spaces • Carpool parking provided = 63 spaces (50% more than required) 	7.5
(S) Provide short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirements. <ul style="list-style-type: none"> • Short-term bicycle parking required = 21 spaces • Short-term bicycle parking provided = 24 spaces 	1.5
Total Points for Mobility Choices Compliance	10.5 points

As a result of the strategies that the Project will implement based on Complete Communities: Mobility Choices, the Project will provide strategies that add up to at least 10.5 points, which exceeds the minimum requirement of five (5) points for development within Mobility Zone 2.

Therefore, the Project complies with the Mobility Choices program regulations as mitigation to the extent feasible by relying upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR for its significant VMT impact.