

## **Appendix C. Transportation Impact Analysis**

---

*This page intentionally left blank.*



TO: Kristin Blackson, PMP; Senior Project Manager; Harris & Associates  
FROM: Phuong Nguyen, TE, Senior Transportation Engineer; CR Associates  
DATE: March 8, 2022  
RE: Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit- Transportation Impact Analysis

---

The purpose of this technical memorandum is to document potential transportation impacts associated with the Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit (Project). The Project calls for the removal of the 30-foot building height limit in the Midway-Pacific Highway Community Planning Area, but does not change the underlying base zone regulations, including the base zone's height limit.

## Background

In 1972, City of San Diego (City) voters passed Proposition D. Proposition D was a citizens' initiative that amended the San Diego Municipal Code (Municipal Code) to impose a 30-foot height limit on buildings constructed in the City's Coastal Height Limit Overlay Zone.

The Coastal Height Limit Overlay Zone, as defined by Proposition D and included in the Municipal Code, includes the City's land and water area from the northern City limits, south to the border of Mexico, extending seaward to the outer limit of the City's jurisdiction and inland to Interstate 5 on January 1, 1971 (Municipal Code Section 132.0505[b]). The Municipal Code Sections 132.0505(b) (1) through (4) identify areas where the Coastal Height Limit does not apply.

On September 17, 2018, the City Council adopted the Midway-Pacific Highway Community Plan Update (Community Plan), including the certification of the Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report (PEIR, Project No. 561546/SCH No. 2015111013). The Community Plan, as adopted, includes up to 11,585 residential dwelling units and 10,091,215 SF of non-residential land uses (see Table 3-4 and Table 3-5 of the PEIR).

In November 2020, the Project was put to ballot and passed by meeting the simple majority (50%+1) voting requirement. The Project does not include approval of any specific developments and does not change the underlying base zone regulations, including the base zone's height limit. Any proposed future developments must comply with all governing laws at the time that the development project application is submitted to the City. Building height would still be regulated by zoning laws in the Municipal Code and any height restrictions associated with an adopted Airport Land Use Compatibility Plan (ALUCP).

## Analysis

The analysis presented below provides a program-level review to determine whether the Project would change the transportation impact findings identified in the PEIR. Since the adoption of the Community Plan, the City has updated its California Environmental Quality Act (CEQA) Significance Determination Thresholds (December 2020) to reflect the implementation of the new transportation

threshold. The new threshold identifies Vehicle Miles Traveled (VMT), in lieu of Level of Service (LOS), as the metric of determining transportation impacts.

When comparing the thresholds utilized in the PEIR to the latest City’s CEQA transportation thresholds, a total of five (5) topics are applicable to this analysis. **Table 1** provides a side-by-side comparison of these thresholds.

**Table 1 – CEQA Thresholds - Transportation**

Threshold	Included in the PEIR?	Included in Current Thresholds?
1. Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	Yes	No
2. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	Yes	Yes
3. Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?	No	Yes
4. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	Yes
5. Result in inadequate emergency access?	No	Yes

Analysis of the Project against the applicable CEQA thresholds is provided below:

1. *Does the Project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?*

While the Project calls for removing the 30-foot building height limit, it does not propose more intensive land uses, zoning, or density than those adopted in the 2018 Community Plan and analyzed in the PEIR and does not change the underlying base zone regulations, including the base zone’s height limit. Thus, traffic associated with the Project would not be greater than what was already analyzed and disclosed in the PEIR. Additionally, with the adoption of the SANDAG Regional Transportation Plan (2021 RTP), which includes a more extensive transit network and active transportation network, traffic associated with the Project would likely decrease from what was shown in the PEIR.

2. *Does the Project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?*

The Project does not propose any change to the currently adopted transit, roadway, bicycle, and pedestrian facilities, as well as mobility policies. Therefore, the Project would not conflict with any

adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities.

3. *Does the Project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?*

While the Project calls for removing the 30-foot building height limit, it does not propose more intensive land uses, zoning, or density than those adopted in the 2018 Community Plan and analyzed in the PEIR and does not change the underlying base zone regulations, including the base zone's height limit. The Project also does not propose to change the land use or zoning designations, thus, VMT associated with the Project would not be greater than what was already analyzed and disclosed in the PEIR.

4. *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The Project does not propose any change to the currently adopted transportation network, nor does the Project propose any unsafe design feature or incompatible uses that would cause an increase in hazards when compared to the currently adopted Community Plan and analyzed in the PEIR.

5. *Result in inadequate emergency access?*

The Project does not propose any change to the currently adopted transportation network or land uses. Therefore, the Project would not result in inadequate emergency access, when compared to the currently adopted Community Plan and analyzed in the PEIR.

## **Conclusion**

As shown above, the Project would not result in an inconsistency with the analysis in the 2018 PEIR, nor would the Project exceed any of the thresholds set in the City's CEQA Significance Determination Thresholds (December 2020). Therefore, no additional transportation-related impact would be identified as a result of the Project.

*This page intentionally left blank.*