

Technical Memorandum

March 27, 2022

To: Ann Gonsalves, PE – City of San Diego
Mary Rose Ann Santos – City of San Diego

From: Jacob Swim, TE – Michael Baker International

Re: Palm and Hollister Development – Vehicle Miles Traveled (VMT) Assessment (PTS# 698277)

Introduction

This technical memorandum (memo) evaluated potential VMT impacts as it relates to the proposed Palm and Hollister Development (Project). A residential project that is located in a VMT efficient area would not be required to prepare a detailed transportation VMT analysis. The project is presumed to have a less-than-significant VMT impact on the environment according to the City's Transportation Study Manual (TSM) dated September 29, 2020. Based on SANDAG's SB743 VMT Maps, the Project is located within Census Tract 101.07 (Series 14 Base Year 2016) with a resident VMT per capita of 15.4 miles, which is 80.9% of the regional average of 19.0 miles per capita. Since the Project is located within a VMT efficient area at less than 85% of the regional VMT/capita, the Project is screened out from needing to prepare a detailed transportation VMT analysis. In addition, the Project is presumed to have a less-than-significant VMT impact on the environment.

Thresholds of Significance

In December 2018, new California Environmental Quality Act (CEQA) guidelines were approved that shifted traffic analysis from delay and operations to VMT when evaluating Transportation Impacts under CEQA. This change in methodology is a result of Senate Bill 743 (SB743), which was signed into law in September 2013. SB743 "creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires OPR to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must 'promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.'¹ ²

¹ Public Resources Code Section 21099(b)(1)

² Office of Planning and Research, <http://www.opr.ca.gov/ceqa/updates/sb-743/>

Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”³ According to SB743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of TDM strategies.

As part of the development of the new CEQA guidelines, the Governor’s Office of Planning and Research (OPR) prepared a Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018 (Technical Advisory). The Technical Advisory provides guidance for local jurisdictions in developing methodologies and thresholds for evaluating VMT. The Technical Advisory provides VMT thresholds for residential, employment and other uses. For all projects, the Technical Advisory recommends establishing the VMT threshold at 85% or less of an adopted VMT threshold including VMT/capita for residential projects, VMT/employee for employment projects and total VMT for all other uses.

In September 2020, the City of San Diego developed their own VMT guidelines, thresholds and screening criteria for development projects. According to the City’s TSM, the screening criteria that applies to the Project is as follows:

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.

Projects that do not meet the above screening criteria must include a detailed evaluation of the VMT produced by the project. For residential projects, the threshold for determination of a significant transportation impact is 15% below regional mean VTM per Capita.

³ Public Resources Code Section 21099(b)(1)

Vehicle Miles Traveled (VMT) Screening Assessment

According to the City’s TSM, a project that meets at least one of the CEQA screening criteria below would **not** be required to prepare a detailed transportation VMT analysis and the project would be presumed to have a less-than-significant VMT impact.

- 1.) Residential or commercial project located in a VMT efficient area;
- 2.) Industrial or Agricultural project located in a VMT efficient area;
- 3.) Small project (generates less than 300 unadjusted daily vehicle trips);
- 4.) Locally serving retail/recreational project;
- 5.) Locally serving public facility; or
- 6.) Affordable housing

Based on our assessment of the screening criteria, the Project is located in a VMT efficient area. As shown in **Exhibit 1**, the Project is located within a census tract 101.07 (Series 14 Base Year 2016) with a residential VMT per capita of 15.4 which is 80.9% of the regional mean of 19.0 VMT per resident. Since the Project is located within a VMT efficient area at less than 85% of the regional mean VMT/capita, the Project is screened out from needing to prepare a detailed transportation VMT analysis. In addition, the Project is presumed to have a **less-than-significant VMT impact** on the environment.

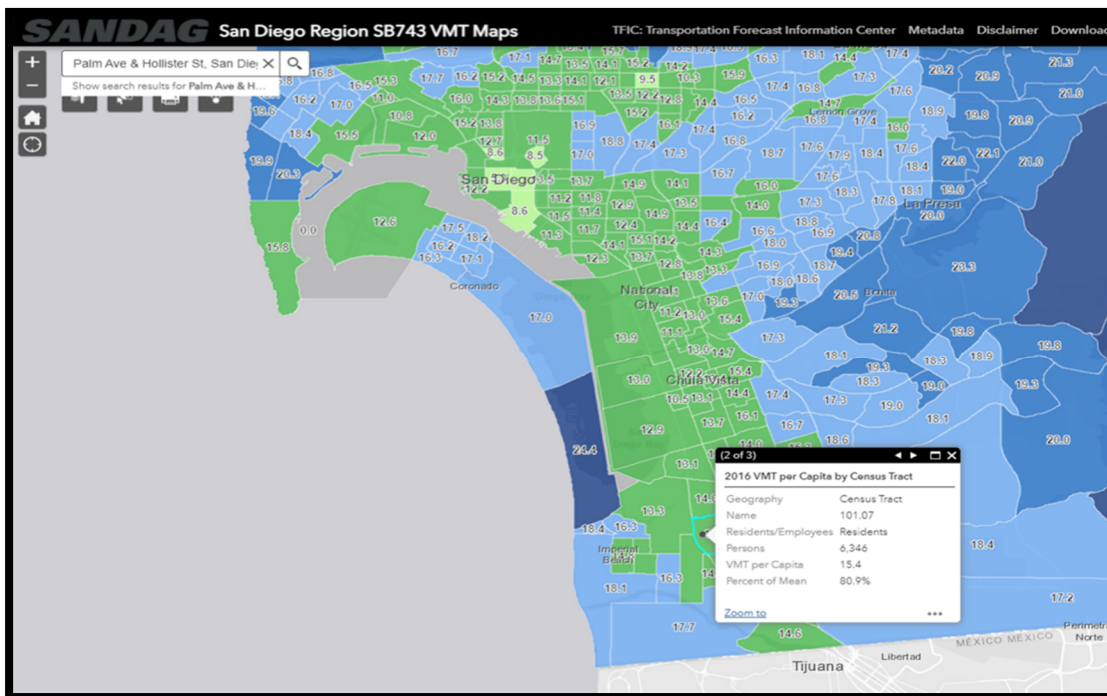


EXHIBIT 1 – SANDAG VMT SCREENING