

## MEMORANDUM

To: City of San Diego Transportation Staff

From: Jon Collins  
Kimley-Horn and Associates, Inc.

Date: July 12, 2024

Subject: AVA PB Apartments – Vehicle Miles Traveled Analysis, PRJ-1059329  
(Preliminary Review PTS #: 684566)

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### Introduction

Senate Bill (SB) 743 was approved by the California legislature in September 2013, requiring changes to the California Environmental Quality Act (CEQA) methodology, specifically directing the Governor’s Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular “level of service” (LOS) for evaluating transportation projects. OPR published the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) in December 2018 providing recommendations for the preparation of transportation impact analysis under SB 743, suggesting Vehicle Miles Traveled (VMT) to replace LOS as the primary metric to evaluate transportation impacts per CEQA. The Technical Advisory required updated transportation procedures by July 1, 2020.

The City of San Diego’s (City’s) Transportation Study Manual (TSM), current version dated September 19, 2022, provides guidance on preparing transportation studies for projects within the City, pursuant to SB 743. The manual addresses the shift from LOS analysis to VMT analysis for CEQA and updates the LOS methodology that will still be required as part of the Local Mobility Analysis (LMA) for the City.

This memorandum contains the VMT analysis and results for the proposed AVA PB Apartments development located on the land between the intersection at Ingraham Street and La Playa Street and the intersection at Fortuna Avenue and Jewell Street in the City of San Diego, California, in accordance with the City’s TSM. The LMA for this development is provided in a separate document.

The vicinity map is shown in **Figure 1** and the project study area is shown in **Figure 2**.

### Project Information

The proposed project is located at 3833 Ingraham Street, San Diego, CA within the Pacific Beach Community Planning Area of the City of San Diego and more specifically in the area bounded by Ingraham St, La Playa Ave, Jewell St, and Fortuna Ave.

The project would repurpose underutilized surface parking areas within a 12.96-acre site currently occupied by 564 multi-family dwelling units, resident amenities and five acres of surface parking to provide an additional 138 multi-family dwelling units and two new underground parking garages. The total number of dwelling units on the site will be 702. This project proposes a total of 634 vehicle spaces

(including 23 accessible spaces), 65 electric commercial vehicle spaces, 70 short-term bicycle storage spaces, and 15 motorcycle spaces. The project will be constructed in one phase. The project is located within a Parking Standards Transit Priority Area, which has a parking requirement of zero vehicle spaces for residential uses. Although the project exceeds the minimum (zero) parking requirements in the transit priority area, the project does not exceed the basic parking rates per Table 142-05C of the San Diego Municipal Code (1,140 spaces required under basic parking standards). Calculations for the basic parking rates are summarized in **Table 1**.

**Table 1. Parking Requirement Calculations for Basic Parking Rates**

Multiple Dwelling Unit Type and Related Accessory Uses	Project Units (Total Site)	Automobile Spaces Required per Dwelling Unit (Basic Rate)	Total Vehicle Spaces (Basic Rate)
<b>Studio up to 400 square feet</b>	120	1.25	150
<b>1 bedroom or studio over 400 square feet</b>	349	1.5	524
<b>2 bedrooms</b>	233	2	466
<b>TOTAL</b>	<b>702</b>		<b>1,140</b>

Access to the Project site will be provided through seven unsignalized driveways along Jewell Street, La Playa Avenue, and Ingraham Street. These driveways will provide access to the main entrance and parking lots.

The development is located in the RM-3-7 zone of a Parking Standards Transit Priority Area, within Mobility Zone 2. Due to the proposed increase in density for the site to 54 dwelling units per net residential acre, the project will require a Process 5 Community Plan Amendment (CPA) / General Plan Amendment and a Rezone from RM-3-7 to RM-3-8 to be consistent with the ultimate proposed density. The project will also require a Coastal Development Permit, Neighborhood Development Permit, and a Public Service Easement Vacation.

The proposed site plan is presented in **Figure 3**.

### Methodology

The City’s TSM establishes VMT as the performance metric for measuring significant transportation impacts according to CEQA. The manual provides VMT screening criteria, significance thresholds, analysis methodologies, and mitigation measures.

The Project is subject to the Mobility Choices Regulations, the purpose of which is to reduce VMT to address the impacts of development by investing in active transportation infrastructure and amenities that will result in the greatest reductions to Citywide VMT. The project intends to tier off the Complete

Communities: Mobility Choices Program EIR for purposes of mitigation of transportation VMT impacts under the California Environmental Quality Act (CEQA). The EIR states that compliance with the Mobility Choices Regulations is intended to serve as mitigation for future development.

### Initial Screening

Projects are compared against initial screening criteria to determine if the project can be presumed to have less than significant VMT impact based on project features regarding location, size, and use. The City's screening criteria include the following:

- **VMT Efficient Location** – Projects located in a VMT Efficient Location per the SANDAG Screening Map
  - Residential or commercial employment – 15% or more below the base year average residential VMT per capita or commute VMT per employee
  - Industrial employment – average or below average base year commute VMT per employee
- **Small Project (Trip-based)** – less than 300 daily unadjusted driveway trips
- **Locally Serving Retail** – 100,000 square feet gross floor area or less, has market capture area of three miles or less, and serves a population of roughly 25,000 people or less based on a market area study
- **Locally Serving Public Facilities** – serves the surrounding community such as transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices, or a public facility that is a passive use such as utility buildings, water sanitation, and waste management
- **Affordable Housing Project** – provides access to transit and meets one of the following criteria: affordable to persons with a household income equal to or less than 50% of the area median, housing for senior citizens, or housing for transitional foster youth, disabled veterans, or homeless persons
- **Mixed Use Project** – can use screening criteria above for each land use
- **Redevelopment Project** - results in a net decrease in total project VMT

If the project does not meet the screening criteria listed above, a detailed VMT analysis is required.

### VMT Screening and Significance Thresholds

If a project is determined to require full VMT analysis after the initial screening, the appropriate VMT analysis methodology is applied per land use type as summarized in **Table 1**. The results of the VMT analysis are compared to the significance thresholds identified for each type of land use also provided in **Table 1**. If the project is found to have potential significant impacts, mitigation is required to reduce the project's VMT to a level below significance or to comply with the Mobility Choices regulations and rely on the Statement of Overriding Considerations for the Complete Communities: Mobility Choices Program FEIR.

*For Residential Land Use Type: 15% below regional mean VMT per capita*

## Project VMT Screening Assessment

Based on the City’s TSM guidelines outlined above and further explained in **Attachment A**, the initial screening evaluation for potential VMT impact for the AVA project is summarized in **Table 2**.

**Table 2. VMT Assessment: Initial Screening**

Screening Criterion	Project Analysis	Pass?
<b>VMT Efficient Location</b>	<p>A screenshot of the SANDAG Series 14 (ABM 2+ Base Year 2016) Regional VMT screening map at the Project site is provided in <b>Figure 4</b>. Based on the screening map, the census tract that contains the Project site (Census Tract 77.02) is not a VMT efficient area, with over 85 percent of the regional residential mean VMT per capita:</p> <ul style="list-style-type: none"> <li>• SANDAG Series 14 (ABM 2+ Base Year 2016) Regional Residential VMT per Capita: <b>18.9</b></li> <li>• Project Site Census Tract Residential VMT per Capita: <b>17.4</b></li> <li>• Percent of Regional Residential Mean VMT per Capita: <b>91.9%</b></li> </ul> <p>Because the census tract residential VMT per capita is 91.9% of the residential mean VMT per capita of 18.9, it is more than the 85% threshold and does not pass the screening.</p>	No
<b>Small Project</b>	The project generates less than 300 daily unadjusted driveway trips	No
<b>Locally Serving Retail</b>	Not Applicable; project is not a locally serving retail project	No
<b>Locally Serving Public Facilities</b>	Not Applicable; project is not a locally serving public facility	No
<b>Affordable Housing Project</b>	This project provides 6 units of affordable housing that are below market rate between 30%-60% Area Median Income (AMI). However, this does not screen the project out of VMT analysis.	No
<b>Mixed-Use Project</b>	Not Applicable; project is not a mixed-use project	No
<b>Redevelopment Project</b>	This project would not result in a net decrease in total project VMT.	No

As described above, the project is located within Census Tract 77.02 with 17.4 VMT per resident, which is 91.9% of the regional mean. The significance threshold for a residential project is 15% or more below the regional mean VMT per capita. Therefore, a full VMT analysis is required.

## SIGNIFICANCE DETERMINATION

The project is in a census tract with a residential VMT per capita of 17.4, or 91.9% of the regional mean. The residential VMT per capita for the project exceeds the significance threshold for residential projects of 15% below the regional mean VMT per capita. The project proposes implementing mitigation strategies to reduce the transportation VMT impact.

## Mobility Choices

The San Diego Municipal Code (SDMC) Ordinance Number O-21274 was adopted on December 9, 2020, and describes the regulations for the Mobility Choices portion of the Complete Communities Program. One purpose of the Mobility Choices Regulations is to reduce Citywide VMT to address the environmental impacts of development by investing in active transportation infrastructure and amenities that will result in the greatest reductions to Citywide VMT.

The AVA project is subject to Mobility Choices Regulations. A portion of site is located within Mobility Zone 2, meaning it is partially or entirely within a Transit Priority Area (TPA). **Figure 5** shows the project within a TPA. Additionally, the project is located within a Coastal Overlay Zone. The Coastal Commission certified the Complete Communities: Mobility Choices Ordinance on September 7, 2022.

## MITIGATION

The VMT reduction measures for all developments within Mobility Zone 2 are outlined in San Diego Municipal Code Section 143.1103(b). These VMT reduction measures are in accordance with the City of San Diego's Land Development Manual Appendix T, which provides the list of VMT reduction measures that are divided into categories including Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each unique measure is assigned a point value per unit of that measure.

According to the SDMC Section 143.1103(b)(1), development in Mobility Zone 2 shall include VMT Reduction Measures totaling at least 5 points, unless the project exceeds the parking requirements. If the development results in exceeding parking requirements, then the development must provide 8 points of VMT reduction measures. According to SDMC Section 143.1103(b)(6), the Parking Standards Transit Priority Area regulations shall not apply for the minimum required parking. The AVA project does not exceed the Basic parking requirement (1,140 spaces); therefore, the project must and shall include VMT Reduction Measures totaling at least 5 points. As noted above, the City of San Diego's Land Development Manual Appendix T outlines how developments can reach the 5-point threshold. If a development does not reach at least 5 points of VMT Reduction, SDMC Section 143.1103(b)(5) indicates that the applicant may pay the Active Transportation In Lieu Fee, as referenced in Section 14.1103(c).

**Table 3** outlines the strategies from Appendix T that the project will implement to achieve at least 5 points VMT Reduction points. **Figure 6** shows the site plan with the proposed Mobility Choices measures.

**Table 3. VMT Reduction Measures using Mobility Choices Ordinance Tracking**

#	Measure Description	Unit	Points Per Unit	# of Units	Total Points	Notes
<b>Pedestrian Measures</b>						
8	Installing pedestrian resting area/recreation node on-site, adjacent to public pedestrian walkway (with signage designating the space as publicly available). The resting area/recreation node shall be maintained by the property owner.	Each resting area (multiple of 100 square feet)	2.5 (Partial Points Available)	987	4	The project proposes 1,296 square feet of pedestrian resting area onsite adjacent to the public ROW.
<b>Bicycle Supportive Measures</b>						
12	Providing on-site bicycle repair station.	Yes/No	1.5	1	1	The bicycle repair station will be located onsite
<b>Total Mobility Choices Ordinance Project Points</b>					<b>5</b>	

*Source: Mobility Evaluation Tool, City of San Diego Mobility Choices Regulations (Ordinance No. 21274, Dated Dec 9, 2020)*

**Table 3** shows the AVA project’s VMT reduction measures total 5 points, and therefore meets the minimum 5 points required by the Mobility Choices program regulations, thereby partially mitigating the project’s VMT impacts. Notwithstanding compliance with the Mobility Choices regulations, however, the VMT reduction measures would not result in reducing the project’s VMT impact to 85 %the regional mean VMT per Capita. Therefore, the project’s VMT impacts would remain significant and less than fully mitigated.

San Diego’s Complete Communities: Mobility Choices Program EIR CEQA Findings found such significant and unmitigated impacts to be acceptable in light of a variety of overriding considerations generated by the benefits of developments that implemented the City’s Complete Communities: Mobility Choices Program. Among the overriding considerations identified from developments implementing the Mobility Choices Program were the following:

- They implement the goals and policies of the General Plan, Climate Action Plan, and Housing Strategies;
- They promote economic and employment growth;
- They promote the City’s complete streets strategy;
- They promotes pedestrian scale development strategies;
- They promote recreational and infrastructure opportunities; and
- They promote Climate Action Plan trip reduction strategies.

The overriding considerations are described in more detail in Council Resolution 313279<sup>1</sup>.

## Conclusion

The AVA project does not meet the VMT screening criteria from the City of San Diego's TSM. The project is located in a census tract with a residential VMT per capita of 17.4, or 91.9% of the regional mean. Based on the VMT significance threshold for a residential project, the VMT produced by the project would have a significant impact. The significant transportation impacts created by the project require the developer to implement mitigation strategies or pay an Active Transportation In-Lieu Fee.

The project is required to achieve 5 points per the City's Mobility Choices Regulations. The project will implement the following strategies from Appendix T of the City of San Diego's Land Development Manual:

- Pedestrian Measure 8: Install pedestrian resting area/recreation node on-site, adjacent to public pedestrian walkway. (4 points)
- Bicycle Measure 12: Provide on-site bicycle repair station. (1 point)

With these two strategies the AVA project would meet the standard of 5 points of VMT reduction measure required under the Mobility Choices regulations. However, these measures would not reduce the project's VMT impact to 85% of the regional mean VMT per Capita. Therefore, the project is considered to have a significant and less than fully mitigated transportation VMT impact, which the San Diego's Complete Communities: Mobility Choices Program EIR CEQA Findings found to be acceptable in light of the overriding considerations of the benefits of developments that implemented the City's Complete Communities: Mobility Choices Program.

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<sup>1</sup> [\\*r-313279.pdf \(sandiego.gov\)](#)



Figure 1: Vicinity Map

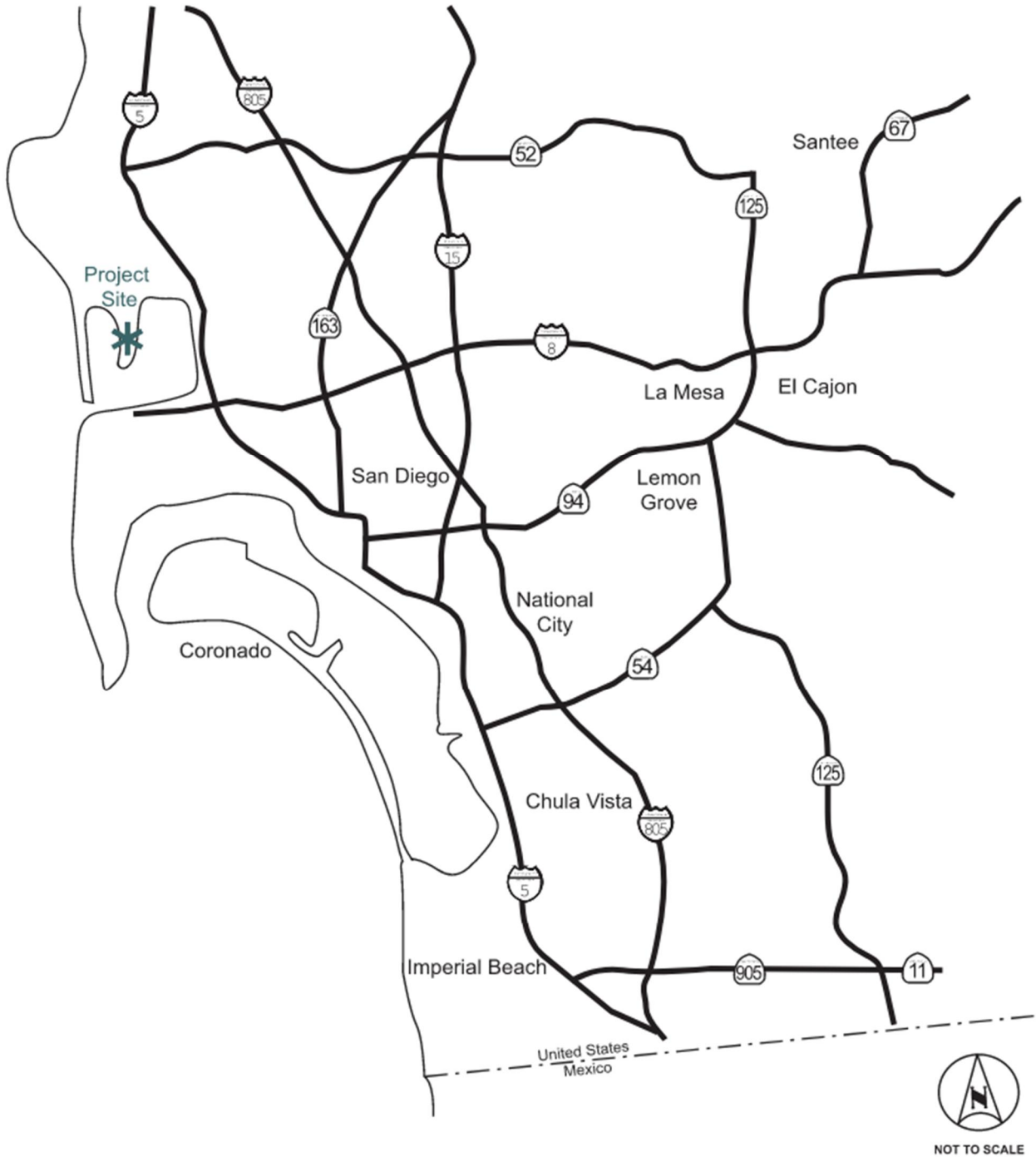




Figure 2. Project Study Area



Figure 3. Project Site Plan

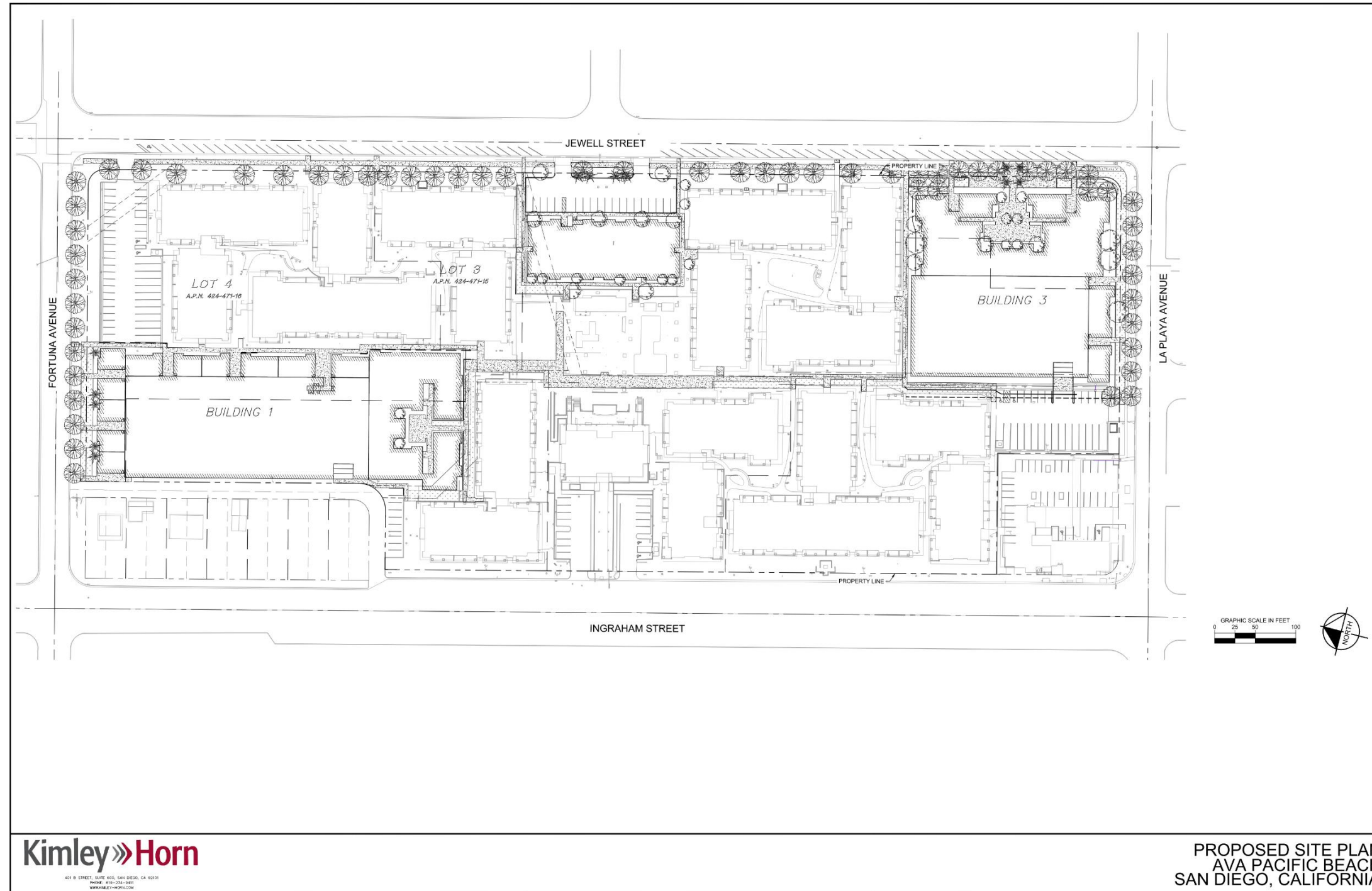


Figure 4. SANDAG VMT Screening Tool – Screenshot of AVA Project Census Tract Location

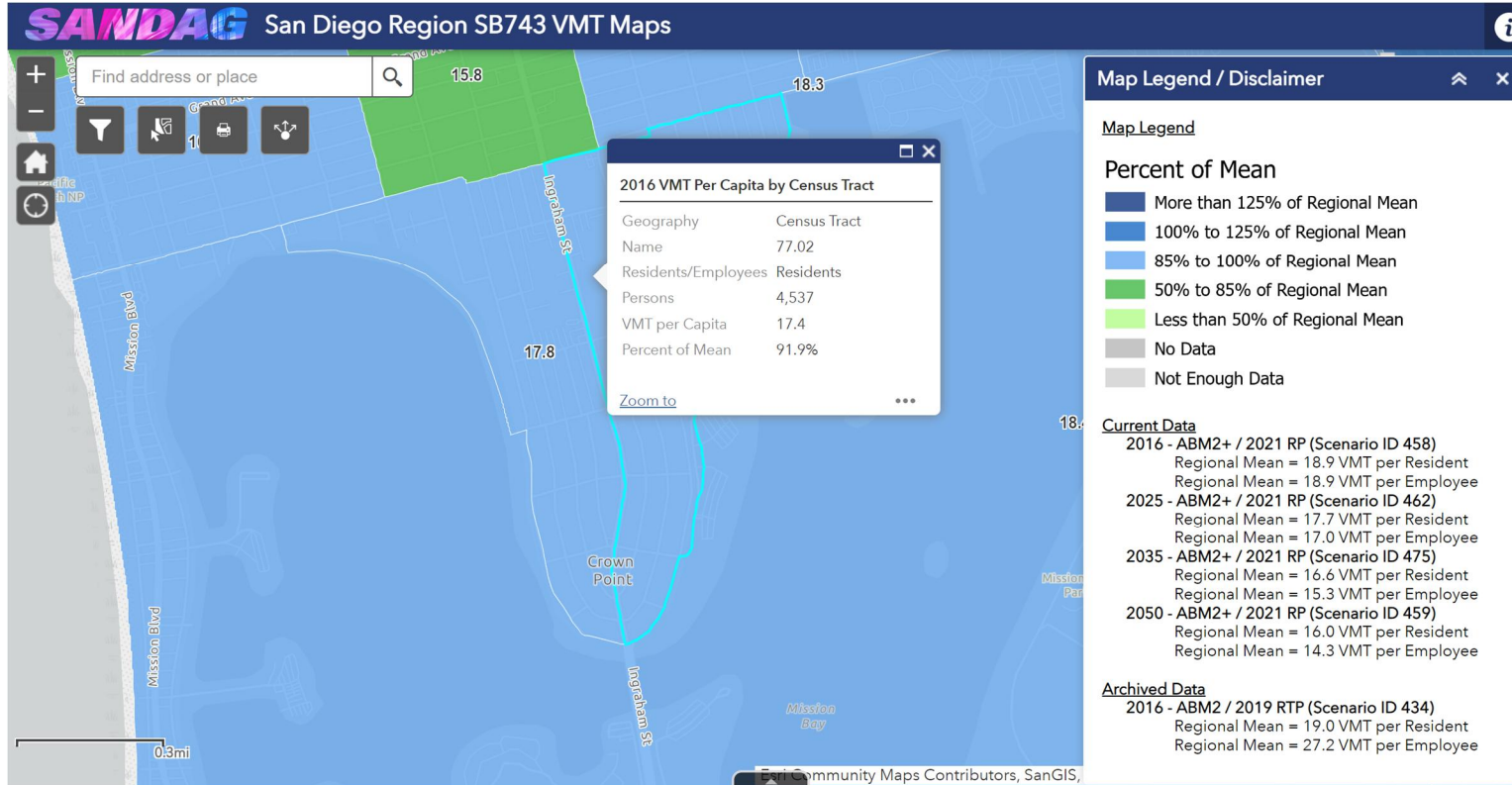




Figure 5: Transit Priority Areas Map

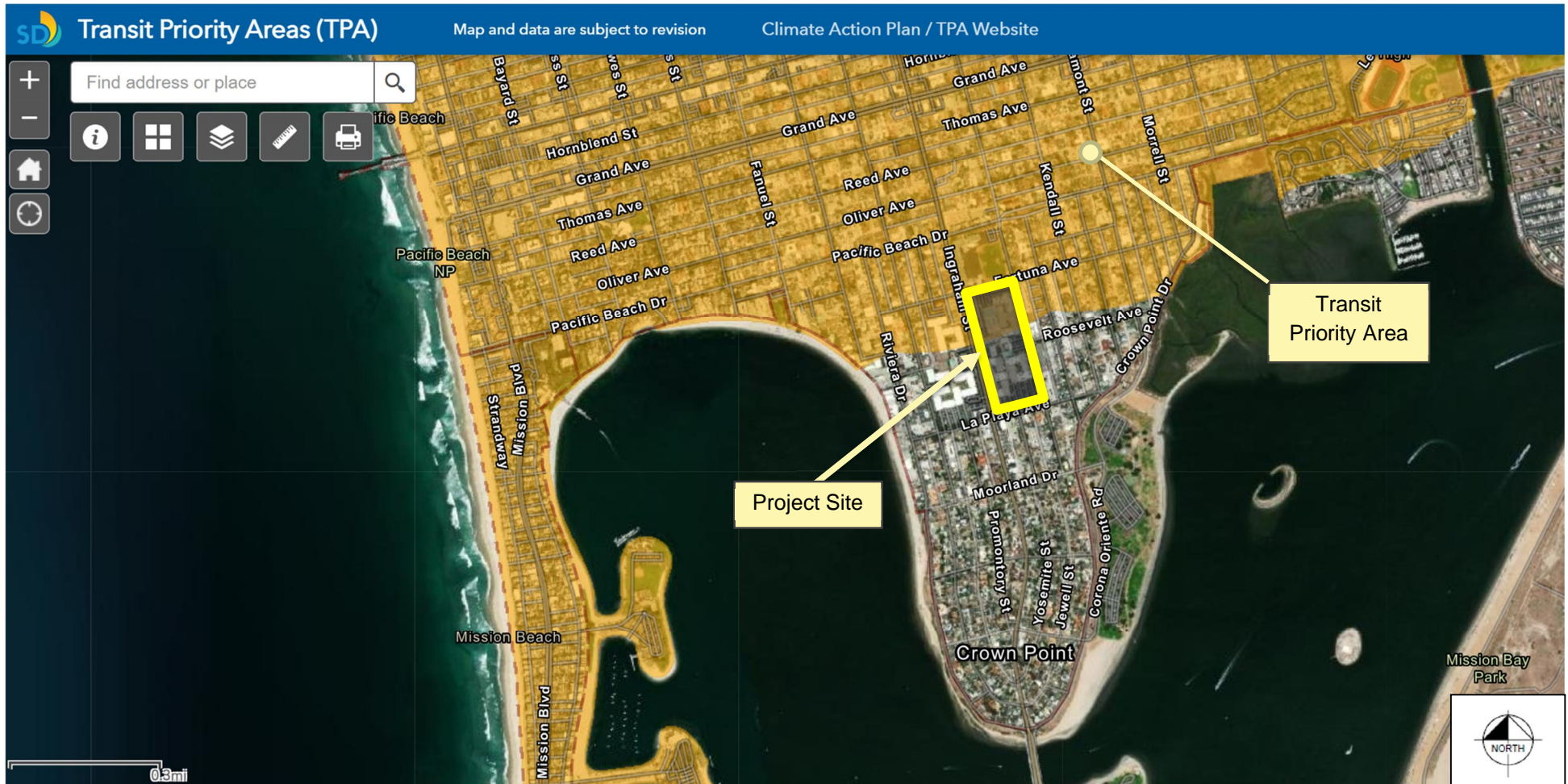
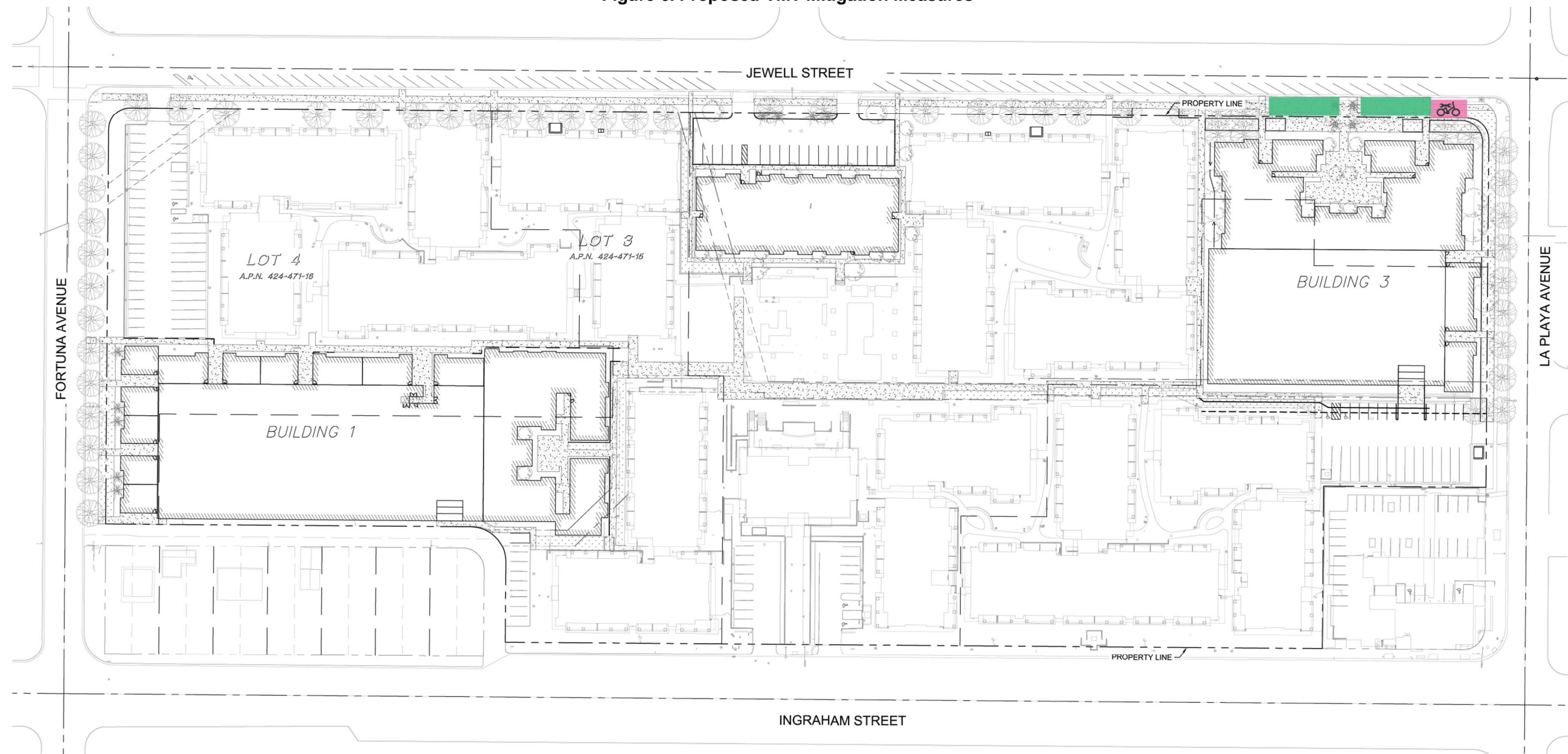


Figure 6. Proposed VMT Mitigation Measures



Mitigation Measures Legend



Pedestrian Resting Node



On-Site Bicycle Repair Station



**Attachment A. Transportation VMT Thresholds of Significance and Analysis Methodologies per Land Use Type**

LAND USE TYPE	THRESHOLD FOR DETERMINATION OF A SIGNIFICANT TRANSPORTATION VMT IMPACT **	ANALYSIS METHODOLOGY
Residential	15% below regional average* resident VMT/Capita	<p><b>For projects that generate less than 2,400 daily unadjusted driveway trips:</b> Identify the location of the project on the SANDAG Resident VMT/Capita map. The project's Resident VMT/Capita will be considered the same as the Resident VMT/Capita of the census tract it is located in. Compare the project's Resident VMT/Capita 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 Resident VMT/Capita.</p> <p><b>For projects that generate greater than 2,400 daily unadjusted driveway trips:</b> Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's Resident VMT/Capita. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Resident VMT/Capita maps.</p>
Commercial Employment, Hotel	15% below regional average* employee VMT/Employee	<p><b>For projects that generate less than 2,400 daily unadjusted driveway trips:</b> Identify the location of the project on the SANDAG Employee VMT/Employee map. The project's Employee VMT/Employee will be considered the same as the Employee VMT/Employee of the census tract it is located in. Compare the project's Employee VMT/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 Employee VMT/Employee.</p> <p><b>For projects that generate greater than 2,400 daily unadjusted driveway trips:</b> Input the project into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's Employee VMT/Employee. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Employee VMT/Employee maps.</p>
Industrial Employment	Regional average* employee VMT/Employee	<p><b>For projects that generate less than 2,400 daily unadjusted driveway trips:</b> Identify the location of the project on the SANDAG Employee VMT/Employee map. The project's Employee VMT/Employee will be considered the same as the Employee VMT/Employee of the census tract it is located in. Compare the project's Employee VMT/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 Employee VMT/Employee.</p> <p><b>For projects that generate greater than 2,400 daily unadjusted driveway trips:</b> Input the project into the SANDAG Regional Travel Demand Model to determine the project's Employee VMT/Employee. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Employee VMT/Employee maps.</p>
Regional Retail, Regional Recreational, Regional Public Facilities, Transportation Projects	Zero net increase in total regional VMT*	Calculate the change to regional VMT using the SANDAG Travel Demand Model. To calculate the change in regional VMT, the regional retail component of the project should be inputted into the travel demand model (year that is used to determine the VMT thresholds). The "with project regional retail" regional VMT produced by the model run is compared to the "no project" regional VMT.
<p>* The regional average and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's Transportation Development Section.</p> <p>** Projects that exceed these thresholds would have a significant impact.</p>		

Source: City of San Diego *Transportation Study Manual Tables 3 and 4 (September 2022)*.