

La Jolla View Reservoir Project
Environmental Impact Report
SCH No. 2018041020 - Project No. 331101

Appendix C

Vehicle Miles Traveled (VMT) Analysis
Technical Memorandum

December 2020



MEMORANDUM

TO: Andrea Bitterling, Helix Environmental
FROM: Jonathan Sanchez, Chen Ryan Associates
DATE: December 2, 2020
RE: La Jolla View Reservoir – Vehicle Miles Traveled (VMT) Analysis Technical Memorandum

This technical memorandum documents the results of the SB-743 compliant transportation impact analysis conducted for the proposed La Jolla View Reservoir project (Proposed Project). The analysis is based on the recently revised (January 2019) State California Environmental Quality Act (CEQA) Guidelines, as well as the City of San Diego Transportation Study Manual (City of San Diego TSM) dated September 29, 2020 and approved by City Council on November 9, 2020.

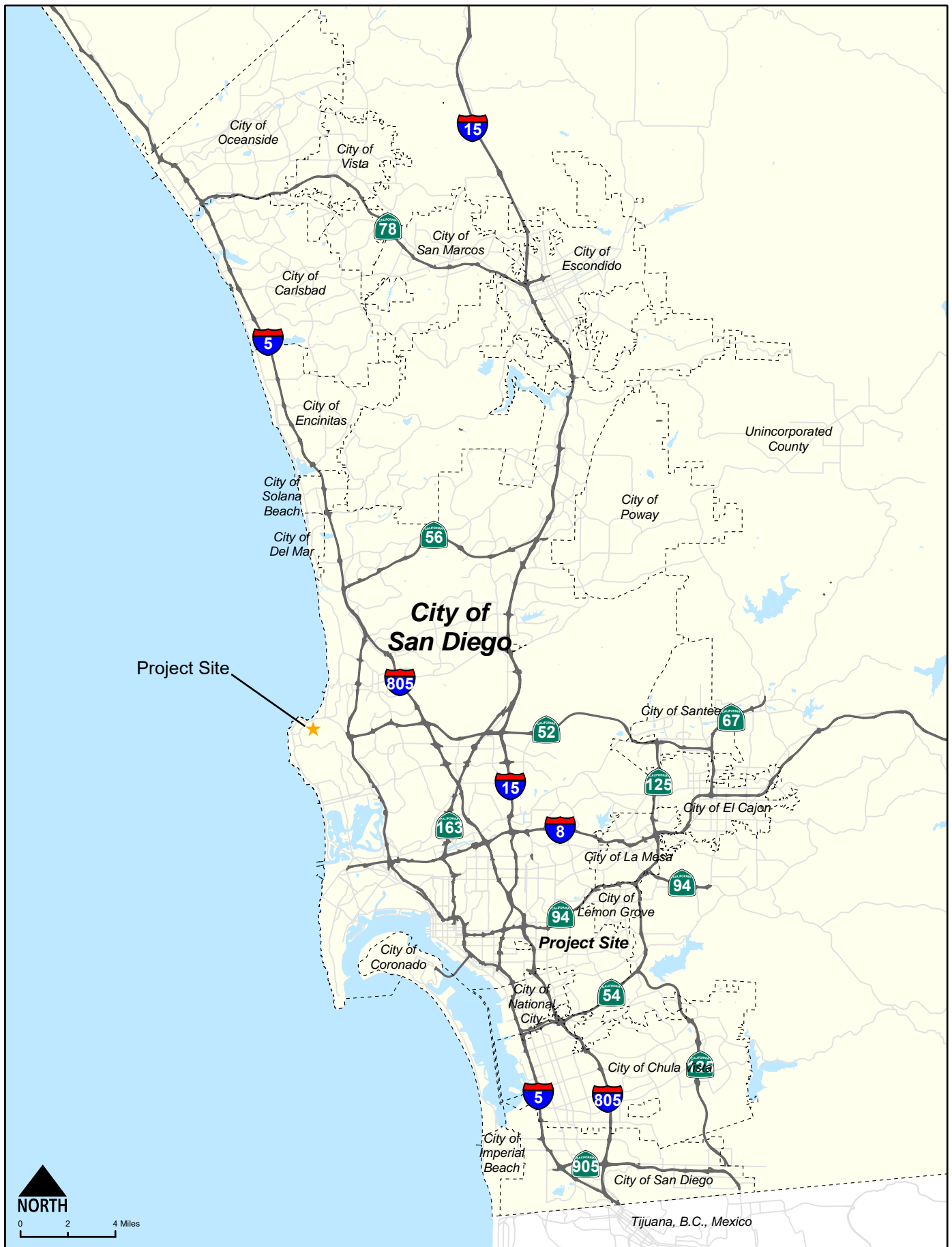
This memorandum is organized as follows:

- 1.0 Project Description** – Provides a brief description of the La Jolla View Reservoir project and its associated trip generation.
- 2.0 SB-743 Background & Analysis Methodology** – Provides background information regarding the updated CEQA Guidelines, including analysis methodology from the City of San Diego.
- 3.0 VMT Analysis & Potential Impact** – Provides the VMT analysis and significant impact discussions.

1.0 Project Description

The Proposed Project would replace the existing Exchange Place Reservoir and La Jolla View Reservoir with a new 3.1-million-gallon reservoir within the La Jolla Heights Natural Park. Use of the existing La Jolla View Reservoir is very limited due to higher-pressure zone and other water system changes. Water quality in the reservoir is also poor and requires supplemental chlorine treatment when in operation. In addition, the existing 16-inch diameter cast iron Muirlands Pipeline that supplies water to the existing La Jolla View Reservoir is beyond its useful life and is undersized for current water conveyance requirements.

Figure 1 displays the Proposed Project regional location, while **Figure 2** displays the site plan.





Project Trip Generation

The Proposed Project is not anticipated to have on-site personnel at the facility and the only trips associated with the project would be related to monitoring and maintenance. The following site access activities are expected to occur:

- For a period of up to 5 years after construction of the La Jolla View Reservoir, periodic visits (approximately bi-weekly) by observers are anticipated to monitor and maintain the landscape restoration process. This is estimated to consist of **1-2 small trucks, or 4 trips per day**, accessing the La Jolla View Reservoir via Encelia Drive and the Exchange Place site via Al Bahr Drive. At the end of the monitoring period, the temporary irrigation systems at each site will be removed. This activity is estimated to involve up to **3 small trucks for up to 3 weeks, or 6 trips per day**.
- For as long as the new La Jolla View Reservoir is in operations, periodic visits are anticipated by City Public Utilities Department operations personnel for maintenance. These visits are expected to be similar to the activities that have taken place at the existing reservoir facilities over the years (**approximately 1 maintenance visit a week, or 2 trips per day**). Enhanced security and remote control systems at the new reservoir will help to reduce these visits further.

In summary, the Proposed Project would generate a maximum of **6 trips per day** during the first 5 years after construction, and **2 trips per day** after the first 5 years.

2.0 SB-743 Background & Analysis Methodology

Background (SB-743)

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with Vehicle Miles Traveled (VMT) as the preferred CEQA transportation metric.

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including new section 15064.3. Under the new section, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the "most appropriate measure of transportation impacts." As of July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT.

Methodology and Screening Thresholds for Land Use Projects

The City of San Diego TSM is consistent with the California Environmental Quality Act (CEQA) guidelines and provides significance determination thresholds for VMT and VMT analysis methodology for land use and transportation projects. As mentioned previously, the City Council adoption of the proposed CEQA Transportation Thresholds and City of San Diego TSM, as part of the Complete Communities: Mobility Choices Regulations, occurred on November 9, 2020. Based on these guidelines, all projects requiring CEQA review shall go through a screening process to determine the level of transportation analysis that is required.

Based on the screening criteria identified in the City of San Diego TSM, projects that can be classified within any of the following screening criteria would be presumed to have a less than significant VMT impact due

to the project's characteristics and/or location and therefore would not require additional VMT CEQA analysis:

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 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 City of San Diego 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 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 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).

*Access to transit is defined as transit being located within a reasonable walking distance (1/2 mile) from the project driveway.

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 redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land uses' 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.

3.0 VMT Analysis and Potential Impact

Based upon the screening criteria identified above, the Proposed Project qualifies as a "Small Project" since it is anticipated to generate less than the 300-ADT threshold described in the City of San Diego TSM. Additionally, the Proposed Project also falls under the "Locally Serving Public Facility" given that the project proposes to construct a water reservoir and a pump station to serve the public. Therefore, as recommended in the City of San Diego TSM, the proposed project may be presumed to cause a less-than-significant VMT impact.