Initial Study/Mitigated Negative Declaration Responses to Comments

Veterans Memorial Park Project

Final Initial Study/Mitigated Negative Declaration With Responses to Comments and Errata

Project Number:
Planning Division Project Numbers: CUP 2021-0014, CDP 2021-0052, HDP 2021-0003, HMP 2021-0006 (PUB 2019-0012)
Capital Improvement Project Number: CIP 4609

Prepared for

City of Carlsbad
Parks & Recreation Department
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Prepared by

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June 2022

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SECTION 1.0
RESPONSES TO COMMENTS ON THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE VETERANS MEMORIAL PARK PROJECT

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed Veterans Memorial Park Project (Project) have been analyzed in an Initial Study/Mitigated Negative Declaration (IS/MND) dated March 2022. The IS/MND was subject to a 30-day public review period which began on March 11, 2022, and ended on April 11, 2022. The City distributed a Notice of Intent (NOI) to adopt an MND along with the IS.

Eight letters were received during the public review period from the following individuals, groups, and agencies.

- Rincon Band of Luiseño Indians;
- North County Advocates;, signed by Howard Krausz, MD;
- Preserve Calavera;
- Sierra Club San Diego Chapter, signed by George Courser and Barbara Collins;
- California Department of Fish and Wildlife;
- Diane Nygaard;
- Sierra Club, signed by David Grubb; and
- Steve Linke.

CEQA Guidelines Section 15074(b) states that prior to approving a project, the lead agency must consider the proposed IS/MND together with any comments received during the public review process. Written responses to comments are not required; however, the City of Carlsbad, as lead agency, has prepared a written response to the comments received for consideration by the Planning Commission and/or City Council. The comment letter, followed by the City's response, are attached. The number provided in the right margin of the comment letters corresponds to the response to the comment.

Based on the evaluation in the IS/MND and the comment received, the City has determined that all potential impacts associated with the Project are less than significant with incorporation of identified mitigation measures (MMs). A Mitigation Monitoring Program has also been prepared and will be implemented for the Project. Therefore, the City of Carlsbad has determined that a Mitigated Negative Declaration in accordance with CEQA is the appropriate environmental document for the Project.

Letter A

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1092 | Fax: (760) 749-8901 | rincon-nsn.gov

April 8, 2022

Sent via email: Eric.Lardy@carlsbadca.gov
City of Carlsbad
Planning Division
Eric Lardy
1635 Faraday Avenue
Carlsbad, CA 92008

Re: CUP 2021-0014, CDP 2021-0052, HDP 2021-0003, HMP 2021-0006 (PUB 2019-0012) Veterans Memorial Park Project in Carlsbad, California

Dear Mr. Lardy,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government. Thank you for providing us with the Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

We have reviewed the Draft MND and request the following revisions regarding the proposed cultural mitigation measures under Section V. Cultural Resources to be inclusive of Rincon:

MM CUL-3 Tribal Cultural Resources Monitoring Agreement. Prior to the commencement of any ground disturbing activities, the City shall enter into a Pre-Excavation Agreement, otherwise known as a Tribal Cultural Resources Treatment and Tribal Monitoring Agreement, with the San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, or other Luiseño tribe. Also, this agreement will contain provisions to address the proper treatment of any tribal cultural resources and/or Luiseño Native American human remains inadvertently discovered during the course of the project. The agreement will outline the roles and powers of the Luiseño Native American monitors and the Project Archaeologist, and archaeological monitors. A copy of said Pre-Excavation Agreement shall be provided to the City of Carlsbad prior to the issuance of a grading permit. 1

MM CUL-5 Uncovered Artifacts of Luiseño Native Americans. Any and all uncovered artifacts of Luiseño Native American cultural importance shall be treated with dignity and respect and be reburied on-site within an appropriate location protected by open space o easement, etc. where the cultural items shall not be disturbed in the future. Any cultural and heritage material/artifacts identified and collected during construction grading activities are to be kept in situ or collected and stored in a secure location agreed upon by Tribal Representatives from the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or other Luiseño tribe for later reburial on the project site. Upon completion of all ground-disturbing and grading activities on the project site, the Tribal Representatives for the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians or other Luiseno

tribe. The reburial location will be covered first by a layer of geomat and then backfilled with clean fill dirt. Once reburial activities are completed, the site will be incorporated as a part of the Macario Canyon/Veterans Park HMP preserve.

MM Cul-6 Preconstruction Meeting. Tribal Representatives from the San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, or other Luiseño tribe as well as the Luiseño Native American Monitor and Project Archaeologist shall be present at the project's on-site preconstruction meeting to consult with grading and excavation contractors concerning excavation schedules and safety issues, as well as consult with the Project Archaeologist concerning the proposed archaeologist techniques and/or strategies for the project.

MM Cul-8 Inadvertent Discovery of Significant Cultural Resources. If a significant tribal cultural resource(s) and/or unique archaeological resource(s) are discovered during ground disturbing activities for this project, the San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, or other Luiseño tribe shall be notified and consulted regarding the respectful and dignified treatment of those resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological and tribal cultural resources. If however, the Applicant is able to demonstrate that avoidance of a significant and/or unique cultural resource is infeasible and a data recovery plan, is authorized by the City of Carlsbad as the lead agency, the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or other Luiseño tribe shall be consulted regarding the drafting and finalization of any such recovery plan.

1 cont.

MM CUL-9 Communication Protocols. When tribal cultural resources are discovered during the project, the City will be contracted immediately. If the Project Archaeologist or archaeological monitors collect such resources, a Luiseño Native American monitor must be present during any collection and/or cataloging of those resources. All tribal cultural resources that are unearthed during the ground disturbing activities, are to be kept in situ or collected and stored in a secure location agreed upon by the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or other Luiseño tribe.

MM CUL-12 Invasive and/or Non-Invasive Testing. No testing, invasive or non-invasive, shall be permitted on any recovered tribal cultural resources without the written permission of the San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or any other Luiseño Native American consulting tribe.

MM CUL-16 Landscaping Plans Near SDI-8303. Any landscaping plans for disturbance areas within 50-feet of SDI-8303 will be developed in consultation with San Luis Rey Band of Mission Indians and Rincon Band of Luiseño Indians, or other Luiseño tribe.

We would like to reiterate that each Native American Tribe—and each Luiseño Band—holds and retains its own body of traditional knowledge, insight, and practice. As a sovereign Indian Tribe, the Rincon Tribe possesses the special expertise necessary for identifying, evaluating, and assessing the integrity of, the adverse effects on, and the environmental impacts to Rincon Luiseño Tribal Cultural Resources. Again, we urge the City of Carlsbad to follow its own "Carlsbad Tribal, Cultural, and Paleontological Resources Guidelines" (ECORP 2017), and ask that the cultural mitigation measures will be inclusive of the Rincon Band, demonstrating the City's efforts to engage with Luiseño tribes in a respectful manner and in good faith.

If you have additional questions or would like to schedule a meeting, please do not hesitate to contact our office at your convenience at (760) 749-1092 ext. 323. Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Response to Comment Letter A

Response 1. The Rincon Band of Luiseño Indians commented on the mitigation measures provided for Tribal Cultural resources. The comment and request is to specifically include the Rincon Band in the mitigation measures. The City appreciates the Rincon Band providing review and comment of the proposed mitigation measures contained in the Draft IS/MND. However, the City respectfully disagrees with the suggested revisions as the mitigation measure is already inclusive of "other Luiseño tribes". As such, no revisions to the Draft IS/MND are necessary.

Letter B

Regarding the Veterans Memorial Park Project draft Initial Study/Mitigated Negative Declaration

I have a couple comments that I hope will be addressed in the final version of this EIR.

1. As proposed, 3.36 acres of the existing 43.37 acres of Hardline area within the Project site would be incorporated into the park. In exchange, the Project would add 12.86 acres of the Project site to the HMP Hardline. A "minor" amendment to the city's HMP is required. (p.5) These changes are mapped in Exhibit 10.

   While this addition of 9.5 acres of Hardline open space is certainly advantageous, it isn't entirely clear, at least not to this reader, why the 3.36 acres needs to be encroached upon. In fact, even more hardline open space is desirable for a variety of reasons including the longstanding goal of 40% open space for Carlsbad as a whole. And the more open space, the more vegetation can exist to trap carbon dioxide and reduce GHGs.

   To allow for more open space, it may not be necessary to develop the entire project all at once.

1

2. Planned Veterans Memorial Park acres are being apportioned among all four quadrants of the city to try to satisfy the GMP standard of 3 acres of park land for every 1000 residents in each quadrant. The southwest quadrant is the most deficient in park acres and residents there have long been demanding a coastal park, especially one that would provide walking access to the beach. Rather than developing the entire park project now, it would seem wise to save a few acres, maybe even for future residential development, in exchange for guaranteed park acres in the southwest quadrant.

2

Howard Krausz, MD

4/10/2022

Response to Comment Letter B.

Response 1. The commenter asks why it is necessary for the Project to incorporate 3.36 acres of the existing 43.37 acres of Hardline area within the Project site. This area, which consists of weedy, non-native vegetation, is proposed to be utilized as a part of the bike park. In exchange, the Project would add 12.86 acres of coastal sage scrub within the Project site to the HMP Hardline, which would result in a net increase of 9.50 acres of Hardline area to the City's HMPs preserve.

Response 2. The commenter asks if only a portion of the Project could be built now, and a few acres reserved for future residential development within the Project site in exchange for that future developer building a park elsewhere in the City. The comment is noted. Implementation of the Project would not preclude the development of other parks at other locations in the City.

Letter C

Preserve Calavera
Coastal North San Diego County

April 10,2022

Eric Lardy
Planning Department, City of Carlsbad
Sent via email

Subject: Comments on MND for Veteran's Memorial Park

Dear Mr. Lardy:

These comments are made on behalf of Preserve Calavera. Preserve Calavera is a grassroots conservation organization whose mission is to preserve, protect and enhance the natural resources of coastal north San Diego County.

Our primary concerns with this project are its impacts on our natural resources, particularly those that are within or adjacent to hardline preserve lands in the City of Carlsbad. This project is proposed on one of the largest remaining natural lands in the city and is partially within the coastal zone. This requires special attention to all of the direct, indirect and edge effects associated with development like this. In addition, it will increase vehicle trips in the area and the associated Greenhouse Gas (GHG) and air pollution.

The following are our specific issues of concern:

Concerns with Project Phasing

Earlier proposals for this project proposed development in 2 phases, with part of the site next to hardline preserve deferred until specific uses were defined. This now proposes a single phase of development, providing no opportunities for future phases to reduce project impacts or to reallocate park acres to the quadrants where they would better meet park demands within the quadrant. Please explain why this was done. 1

Biological Resources

- No analysis of impacts of trail through 3.1acre mitigation area for Poinsettia 61

This area is identified as required mitigation for the Poinsettia 61 project, with restoration of CSS required. A trail is proposed through the center of this added habitat. Trails create edge impacts and in effect greatly reduce the biological value of small parcels like this. These trail impacts have not been addressed. This is of particular concern because of the on-going damage to habitat in the project vicinity from off trail use, and on-trail use by bicycles where they are not allowed. The increasing number of e-bikes adds to these impacts because they are heavier, move faster and can contribute to greater trail erosion and conflicts with pedestrians. 2

www.preservecalavera.org
5020 Nighthawk Way. Oceanside, CA 92056

The MND needs to address these potential impacts and ensure that mitigation is included. This should include signage, public education and enforcement.

2 cont.

- Inability to evaluate wildlife movement through the site because of regular mowing

Most of the proposed development footprint has been regularly mowed for many years. That has greatly reduced the ability to determine how wildlife are actually moving through the site. There is a statement on page 26 of the BIO report that it is assumed that wildlife will simply shift to more nocturnal movement patterns because they have done so on Village H. There are substantial differences between the two sites that would question the validity of such an assumption. Village H has not been subjected to years of mowing that might impact wildlife movement. It has had a substantial reduction in use from its peak a few years ago when there was unauthorized outreach to attract off-leash dogs. There has been substantial collection of wildlife data on that site recently from cameras and field surveys. And it is a low intensity use from primarily walking along trails- and not the addition of hundreds of visitors to adjacent land with very intense use. Veterans Park will have a huge increase in use as it goes from having minimal public use from limited public trails to being a regional park serving multiple uses. This increase will include cars, people, dogs and bicycles. We are not aware of any data that has been collected on Veterans Park about existing wildlife movement or how changes in use might impact that movement. Wildlife might become more nocturnal, they might change their movement corridors, or they might relocate. We don't know how they use the site today which makes it difficult to determine how they will use it in the future.

3

- Proposed 1:1 wetland mitigation may be insufficient in the long term

The HMP requires wetland mitigation at a 3:1 ratio. The project wetland impacts will be mitigated at the No County Habitat Bank. Because the Bank has met its 5 yr success criteria it is assumed that 1:1 mitigation will be sufficient. However full mitigation requires that this mitigation site will continue to meet success criteria in perpetuity. There is nothing in the MND that ensures that the bank will do so, or what action will be taken if it does not. This is of particular concern because these impacts are in the coastal zone that has specific requirements to protect coastal resources. Consequently, this remains a potential adverse impact. The MND needs to include specific conditions that ensure this wetland mitigation will meet success criteria or further mitigation will be required- in perpetuity.

4

-Edge effects are not adequately mitigated

Bio 6 discusses predator control as one of the edge affect conditions that will be managed. But there is a long- documented history of damage to biological resources from off leash dogs. Effective predator control needs to address this. This should include requirements for a high level of Ranger patrol of this site, with corrective action for violators to ensure that these conditions are actually enforced. Furthermore, there is substantial evidence of off trail use of trails through habitat areas. That also requires sufficient monitoring and enforcement to ensure impacts are being managed.

5

- No mention of modification of open space management plan to address changing conditions

6

Parks that include sensitive biological resources require specific plans to ensure those resources are protected. In this case over half of the land is now designated as a hardline preserve. Trails through that preserve will have greatly increased use. In addition, there is a high potential for park users to go off trail, intentionally or unintentionally damaging the biological resources- from a toddler picking a wildflower, to retrieving a ball from a game of catch. Management plans for preserves factor in the projected impacts of allowed public use. But the conditions on this preserve will change dramatically from when the original open space plan was approved. There is no indication that the open space plan will be modified to account for changed use, or that it has been adequately funded.

6 cont.

Land Use

- No identification of what requires a CUP or conditions that will be included

The list of related actions that will be included with approval of the project and the MND includes approval of a Conditional Use Permit. We did not find anything that identified what was triggering this requirement, or what conditions will be included in such a permit. This is essential information needed to determine if there are impacts that have not been disclosed or mitigated.

7

VMT Analysis

- Faulty VMT analysis also results in faulty Transportation, Air Quality, Energy and GHG analysis

All of these relied on the same faulty analysis of VMT. It is critical to get the VMT correct because so many other environmental impacts are based on that. We appreciate the complexities of predicting trips from a use like this proposed regional park. But the methodology that was used reminds us of the old adage— garbage in, garbage out. Unfortunately, numerous errors in determining the initial inputs have resulted in an unsupported conclusion that building this huge regional park will result in reduced VMT. The following are just a few of the reasons why we do not find this analysis credible:

8

- It ignores the concept of induced demand

Traffic engineers should know that was the problem from years of adding freeway lanes only to find that they were just as congested as they were prior to the millions that was spent to add those lanes. Increasing facilities increases the demand for those facilities and in this case increases the overall trips and VMT. There is no reason to believe that this park would be any different. The VMT analysis assumes that in general new parks just redistribute existing trips- they don't add trips. If the assumptions about VMT are correct then why would the city spend millions of dollars for this new park that results in no new park users? Why would it add new features that do not exist in current parks if not to attract new users? Why would it fulfill a promise made years ago to create a Veterans memorial- if no one wanted such a feature?

Why does the city have a park performance standard of 3 acres of parkland for each 1,000 residents if increasing residents didn't result in a need for more parks? This park is intended to serve the park needs of thousands of current and future residents in all four quadrants of the city.

9

Of course it will result in increased trips- it is being built to meet the park demand for thousands of future residents of the city in all four quadrants. Those increased trips will not all happen when the park opens, but they should be expected to gradually increase over time and that increase has not been accounted for.

9 cont.

- This park is incorrectly defined as a regional facility and that is critical to the assumption of reduced trip length

While this is referred to as a "regional" park- its intent is to meet the needs of Carlsbad residents- not provide a park that serves users outside of the city. This is the only such park identified in the GMP that would serve all 4 quadrants in the city. It is used as part of the basic performance standard of 3 acres of park/ 1,000 residents/quadrant. If these park acres were provided within each quadrant, then 3 of the 4 quadrants of the city would experience shorter trip lengths without the project than they will with the project – because they would be traveling to a park within their quadrant that is a shorter distance from their home than this new park. Even in the NW quadrant where this park is located it could be argued that trip length is increased with the project. The greatest park shortfall is along the coast which was largely built before the performance standard for parks was adopted. Trip lengths from the coastal areas of this quadrant would be greater to this new park in the far southeastern part of the quadrant than they would be to other existing parks in the quadrant or a to a future park that was more centrally located.

10

- Three of the 4 comparison parks are not comparable, and the 4th is questionable

The VMT analysis assumes that trip length for this new regional park would be similar to those of 4 other existing parks, none of which are in Carlsbad. However, 3 of those 4 comparison parks are just single feature bike parks of 4.2 acres or less. That is not comparable to a large, multi-facility park like Veterans Park. The detailed appendices show zip code of origin for trips to those bike parks—not one included a zip code in Carlsbad. Yet they assumed that people from Carlsbad would have shorter trips as they could now go to Veterans Park instead of a bike park much further away. But the data shows they are not going to the other bike parks. So those bike user trips are new trips— they are not shorter trips. The 4th sample park in Encinitas, was of comparable size, with multiple, family-oriented facilities but no extensive bike park. Again this is a questionable comparison.

11

Per their own analysis, Psomas concluded that only 10-15% of trips to Veterans Park will be from bike users, but the Bike Park Users were the focus of the analysis.

Key information is missing that is essential to determine if data from these "comparison" parks is valid. That includes an understanding of how parks are distributed within those cities, and the performance standard that they have for parks. Then one would have to compare the performance standard of those communities with Carlsbad and determine if there is a comparable distribution of park facilities. No such information was provided.

- No comparison of park features or special events to estimated trips

The only park feature that identified a potential number of users was the bike park- with an estimated 10-15% of total park users. What is the total park use for other comparable regional parks? How many users do each park feature generate? None of that information was provided

12

yet it is essential for validating trip projections. The standard SANDAG trip generation guide of course includes parks as one of many trip generators. There is regional data collection to support those SANDAG numbers, but that was ignored.

There also is no discussion about park programming or things like special events that greatly impact trips to a park. The noise analysis indicated that weekend users when there are camps or special events would increase to 800 from an average of 305 on a weekday—an increase of over 200%. The ADT used for traffic increases from 893 on a weekday to 1,099 to a weekend— a 23% increase. Clearly the VMT and transportation analysis has not accounted for peak use conditions.

12 cont.

-Ethics violation

The recently adopted changes to ethics policy make it a violation for consultants who are contracted to develop city guidelines/policies to also do analysis of project compliance with those same guidelines. Fehr and Peers was the consultant to the City for developing and subsequent modifications to their VMT and TIS guidelines. It is a violation of this new policy for them to do technical analysis of compliance for a project- yet they did that for this project. This is a particularly egregious violation because it is a city project. That creates the perception that the consultant will do the analysis that is required to meet the predetermined objective of their client— in this case that there are no problems with VMT.

13

- No justification for ignoring the model specified in the VMT policy or "substantial evidence" in support of the model that was used

The VMT program requires use of the SANDAG model, unless it is determined that a project is so unique that the use of that model would not be appropriate. No substantial evidence was provided that justifies the conclusion that this project is unique- there are large city parks built all over the region. One might guess that the SANDAG model was used— but did not result in the right answer, so a unique model was developed, for this single purpose, that would result in the predetermined answer, ie that there is no issue with VMT.

14

- Inadequate validation of the assumptions about trip lengths for the three categories of park users

The "model" methodology identified three primary types of Park Users—existing Carlsbad residents using parks, Bike Park users, and Curious Users. All of this is based on the primary assumption that there will not be many new users— just redistribution of existing trips.

Certainly, this park includes some features that would generate new trips, both from Carlsbad residents and from outside of Carlsbad. Few other parks have water views. Few other parks are designed to integrate the natural resources as this one has done. No other park has a Veterans memorial. This would be the closest bike park for many regional trips. As previously discussed, the other bike parks are not serving Carlsbad residents—so all of those trips are new trips, not redistributed shorter trips.

15

- No assumptions about park programming and how this impacts use

16

The MND includes no discussion about park programming or things like special events and how this impacts park use, and trips to the park. The noise analysis says special events would be subject to permits that would impose conditions based on the size, type of event, and the time of event— which is not determined at this time. It was assumed that the noise impacts of those events would be addressed in the event permit that would serve to mitigate any impacts. But what about the impact of such events on VMT? There is no such discussion in the VMT analysis. Clearly such events that could attract hundreds of users as was assumed in the noise analysis will also generate VMT that has been ignored.

16 cont.

- The City should be setting the example for the best way to design projects to reduce VMT and GHG—not be setting the bad example of how to get around the rules

What our public agencies do matters. We have to hold them to the highest standards if there is any credibility for expecting other developers in the city to do the right thing.

17

GHG

- Failure to address cumulative impacts

The city is years behind in reporting actual community-wide GHG reductions as is required by the CAP. Annual reports that just list things that have been done, with no results, are meaningless. There is nothing that validates that the CAP has reduced GHG to below the threshold so this project cannot assume it will not add to cumulative impacts.

18

Transportation

-Parking space numbers do not add up

Page 3 of the Bio tech report says there are 72 parking spaces in the northern lot and 37 in the southern for a total of 106 on site spaces. 72 + 37 = 109, not 106. Plus, the text says that there are an additional 100 on street parking spaces nearby but then details hundreds of feet of adjacent roads where parking will be eliminated. Free parking increases potential vehicle trips and the associated GHG and air pollution – both of those impact sensitive species in addition to the health and other impacts on people. Carlsbad has policies about "right-sizing "parking that should have an indirect benefit of reducing the amount of paradise that is paved for parking lots, as well as all of the other associated adverse impacts from automobiles. Furthermore, there is no discussion about how parking will be addressed for those assumed large events with 800 users.

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Furthermore, the TIS identified a parking demand of 66 spaces- yet well over that number is provided, with no explanation for why. In addition, the TIS references a parking study that was not provided.

Please provide further details about parking spaces removed, and those that will remain both on-site and off- site to serve this project- and ensure that parking has been "right-sized."

-TIS referenced, but not provided

We realize that transportation impacts using the old LOS standards are no longer part of the

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CEQA process—but the Transportation Impact Study (TIS) is referenced in the MND, should have been provided and was not. (We received it upon request- but that is not the same as posting it for anyone to read as part of their consideration of potential impacts.) Failure to provide this information makes it impossible to determine if consistent assumptions have been used and that all impacts have been mitigated.

20 cont.

- Problems with the assumptions in the TIS have also caused problems with the VMT analysis.

The key issue is the computation of trips. The SANDAG Not So brief guide was used for the TIS, but was not used correctly and that error was carried forward into the VMT analysis. While Veteran's Memorial Park is referred to as a "regional' park much of it is actually a city park. This is a key distinction because city parks are projected to generate 50 trips /acre, whereas regional parks only generate 20/acre. Trip generation should be 1,900 for the developed parkland (50 trips/acre for the 38 developed acres of city park) that is specifically designed to meet city park requirements. Plus additional trips need to be added for the 53 acres of natural open space.. That rate is probably somewhere between the 20 trips/acre for a regional park and 5 trips/ acre for undeveloped. This is well over 2,000 ADT on a weekday- far greater than the 838 that was used in the MND.

21

- MMLOS for bike/pedestrian/transit not correctly computed

The MND says the project meets the MMLOS for these three modes of alternative transportation but none of those details are provided. But it appears that at least part of that is based on exempting some of the street segments/intersections and part from design features. The design features that are being relied on to ensure compliance are not specified in the MND and therefore cannot be verified as sufficient. They are specified in the TIS but were not carried forward into the MND. While the TIS is not required for CEQA, the interface between the VMT analysis, TIS and other requirements of the General Plan related to mobility make it impossible to verify that impacts have been addressed without seeing all of these interrelated documents.

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Alternative modes of transportation are inaccurately evaluated in the TIS which then falsely conclude they meet required performance standards. The evaluation for public transit is particularly concerning. The key factors that determine transit use are proximity of the transit stop to trip origin or destination and frequency of service. The existing service is evaluated at LOS F. It is then assumed that adding a concrete pad and bench will increase this to LOS A. Route # 444 is essentially a weekday only, peak hour service along Cannon Rd. All of the park amenities (except for entry trail connection) are well over 1/4 mile from the bus stop. There is only one trip in the am peak and one in the pm peak that is even within a 30 min headway. There are hours of the day with no bus service- and there is none on weekends when park use is projected to be the highest. The two key factors that impact transit use have not been addressed. There is no basis for the conclusion that adding a pad and bench would result in such a dramatic change. in LOS- except that the city's computations say it will. The computations make it sound like this is a rigorous evaluation. In fact, it is highly subjective with no evidence to support the point system. This is far different than the point systems used to evaluate roadway LOS that are based on measures of congestion and length of delay.

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- The related section of Cannon Rd is exempt from roadway mitigation under the Mobility Plan because it was already at LOS F when the last General Plan was adopted. That requires additional actions to reduce the impacts by primarily improving alternative transportation and

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reducing the need for auto trips. Failing to do so is not consistent with the adopted General Plan mobility requirements and results in further cumulative impacts to GHG that have not been addressed. 24 cont.

Furthermore, meeting standards because segments are exempted is not actually the same thing as meeting the standards. There is only one nearby residential neighborhood from which park users are likely to walk. The bike connections in theory make the park accessible for bike users. But what is the projected mode split to access the site and how is that related to design features? 25
The number of parking spaces are specified—but without any parking analysis that projects mode split of trips to the park and how many autos need to be accommodated.

There is nothing that demonstrates there has been a meaningful effort to reduce auto trips as is required when auto trips are increased in exempt roadway segments as will occur with this project. The MND has not demonstrated compliance with the GMP performance standard roads or the associated mobility policies in the General Plan. This remains a significant impact that has not been mitigated. 26

Conclusion

This MND has not adequately identified or mitigated many of the potential adverse impacts of this project. The TIS and VMT analyses particularly need to be redone using standard models and assumptions. 27

Thank you for your consideration of our comments.

Sincerely,

Diane Nygaard, President
Preserve Calavera

Response to Comment Letter C

Response 1. This comment asks why the Project is no longer being developed in two phases. There have been no plans to develop the Project in two phases. Due to the grading required to accommodate the Project, it is most efficient to grade the Project site all at one time to minimize the quantities of import and/or export of soil to the site. Likewise, there has been no (city) conclusion that two phases of construction would have less impact on the hardline preserve, nor that park acres would be reallocated to other quadrants after an initial phase of construction was completed.

Response 2. The comment asks why the trail through the 3.1 acre mitigation area for Poinsettia 61 (P 61) was not analyzed. The P 61 mitigation site was located on either side of the pre-existing, unauthorized trail in anticipation of a future trail as part of the city's Trails Master Plan. Impacts associated with the ongoing use and operation of the existing trail adjacent to the P 61 mitigation areas was evaluated as part of the Veterans Memorial Park Project. The mitigation areas will be protected from trail users with fencing on either side of the trail.

Response 3. This comment addresses Project impacts to wildlife movement, and notes that historic mowing on the Project site has changed the habitat and species occurring on the Project site from what previously occurred there. As required by CEQA, the Project's Initial Study has evaluated the impacts of the Project to the existing environment that exists at the time that the environmental analysis began. In response to threshold (d) in Section IV, Biological Resources, of the Initial Study, a summary of impacts to wildlife movement is provided. A more detailed evaluation of wildlife movement is provided in Section 3.5 and 6.4 of the Biological Technical Report, which is provided as Appendix B to the Initial Study. Note that the development of Veterans Memorial Park was anticipated during the development of the HMP, and the adjacent Macario Canyon/Veterans Memorial Park preserve to the east was specifically set aside and protected for wildlife movement in anticipation of park installation.

Response 4. The comment states that the Project's proposed mitigation ratio for wetland impacts may not be sufficient and that the HMP requires 3:1 mitigation. The HMP does not require specific mitigation ratios for Group A habitats, which includes wetlands; rather, HMP Table 11 states that impacts to Group A habitats are "subject to review under Section 404 of the federal Clean Water Act or Section 1600 of the California Fish and Game Code."

The comment also states that the Initial Study must include a mechanism to ensure that the North County Habitat Bank (NCHB) continues to achieve performance standards in perpetuity. That is a requirement of any mitigation bank, including the NCHB. The NCHB is currently a hardline preserve under long-term management by Center for Natural Lands Management, and management is funded through a non-wasting endowment, which will provide funding in perpetuity.

Response 5. The comment states that edge effects to habitat will occur from off-leash dogs and off-trail use of trails, and requests additional analysis and mitigation measures related to these topics. **MM BIO-6** requires that dogs be leashed at all times when at the park, as well as fencing and signage to deter trespass by people and their pets into areas outside of the park. The Project does not deter the City from taking other approaches, such as increased patrols and/or other corrective actions, to encourage park/trail users to stay out of native habitat areas and to keep their dogs on leash.

Response 6. The comment suggests that an open space management plan (long-term preserve management plan) may need to be modified to account for the Project. The preserve management plan for city-owned preserves was updated in October 2021, and will be updated every five years to account for changes to site conditions and threats. All preserves in the city

operate under the principal of adaptive management, in which management and monitoring strategies change as necessary when conditions change. Implementation of the park would not preclude additional patrols, fencing, public outreach, etc. as necessary.

Response 7. This comment asks why a Conditional Use Permit (CUP) is needed for the Project, and what conditions would be required as part of the CUP. A CUP is required to allow for a Public Park in the Open Space Zone for consistency with Carlsbad Municipal Code 21.42.140.

Response 8. This comment states that the inaccurate vehicle miles traveled (VMT) analysis will result in faulty Transportation, Air Quality, Energy and GHG analysis. The VMT analysis was performed consistent with the state of the practice for VMT analysis and per the City of Carlsbad's VMT Analysis Guidelines, September 2020 and OPR Technical Advisory. Responses to comments 9-12 provide additional information.

Response 9. This comment states that the new park will induce VMT in the present by creating new trips and the park will induce VMT from future housing projects.

The future residents of housing projects are expected to follow the same trip patterns as existing residents, and therefore the VMT conclusion for the future development will be consistent with the results of this study.

As discussed within the City of Carlsbad VMT guidelines (Appendix B, page B-2), public facility uses that support housing, such as neighborhood retail, schools, parks, typically do not create new trips, they redirect trips that were already being made. By way of explanation, a household produces an average number of trips per day for various purposes, one of those purposes is recreation. Adding a park will not increase the average number of trips made per day (since time is constrained), rather, the household will choose where to make those trips, and that may change based on a new facility. For example, if the household currently makes their recreation trips to a skate park, but the new park offers bike amenities, they may choose to go to the new park to try a new hobby. If that new park is closer than the skate park, their VMT would be reduced. If it is farther away, their VMT would increase. The VMT analysis evaluates the average change in distance to park uses for City residents with the addition of the proposed project.

The VMT analysis evaluates how the proposed project will affect average daily recreation trips (and VMT) within the city and region due to the proposed project. As described on Page 12 of the VMT Assessment Technical Memorandum, to present a worst-case scenario evaluation of average daily VMT, the analysis includes VMT generated by regional users and "curious users" that travel to the new park because it is new and different (these could be characterized as induced users).

The assumptions regarding park user characteristics for the proposed project is based on evidence from "big data" sources at four similar regional parks that include similar amenities in the San Diego region. Big data provides anonymous cell phone location-based data for actual users of the similar parks within the San Diego region. Since the bike park amenity is unique (and the other amenities are available at other parks in the area), the bike park amenity was the focus of the big data review to determine if the bike park amenity creates substantial regional use. Big data represented that Bike Park component of the Veterans Memorial Park will not attract as much regional users as expected. Looking at three other existing bike parks in the region, it was concluded that the average travel length of park users is 12 miles. Less than 5% of users may drive more than 50 miles to get to bike parks.

Response 10. This comment states that the proposed project is incorrectly defined as a regional facility and that is critical to the assumption of reduced trip length.

The VMT analysis identifies that the majority of the proposed park users are expected to be City residents. The park is intended to serve the entire City and the location of the park is central to the City. Based on geolocation analysis, the park is located closer to more residents in each quadrant of the City than parks located on one end of the City's boundary. Additionally, since the park provides some amenities (i.e. the bike park) that are not offered in other City parks, it will result in Carlsbad residents who used to drive outside the City to seek out those amenities having a closer option.

In addition, even though the analysis indicated that even parks with unique amenities draw most of their visitors from nearby, the analysis conservatively estimates that the proposed park could attract users from the whole region because of unique amenities. To present evidence regarding the VMT generated by users seeking the unique amenities of the park, a detailed geospatial analysis was performed for the City residents and residents outside of the City within a 12-mile buffer of the project to determine the travel distance of these users to bike parks versus the Veterans Memorial Park. Besides the travel distance estimation to bike parks with and without the project, the actual travel distance of park users to four sample parks were obtained from a big data source to understand typical average travel distances of park users.

Response 11. The comment indicates that three of the four comparison parks are not comparable, and the fourth is questionable.

Various factors were considered to select the four comparison parks such as unique facilities and amenities, size, family-oriented amenities, and location. Therefore, only parks in the San Diego region were selected for comparison purposes. Most of the amenities at the proposed project are typical park amenities that are offered at neighborhood parks. If the proposed project were constructed with only typical park amenities, it would be considered completely locally serving and additional VMT analysis would not be necessary. Since the proposed project includes a unique use (bike park amenity), it is necessary to determine if the bike park amenity would attract regional trips or longer distance trips. Therefore, all available bike parks in the region (three) were selected because they offer the bicycle park amenity. For additional information and to confirm the trip characteristics due to the other types of park amenities, a fourth park of comparable size and similar type of amenities was selected. In addition, the fourth park is in closest proximity to the proposed project and provides information about how the location affects trip characteristics.

Please note that the tables included in the appendices are organized by census tracts but were mislabeled originally as zip codes. These tables include all census tracts within the City of Carlsbad as well as census tracts outside the city within 12 miles of Veterans Memorial Park. Round trip length column in the tables represent the round-trip driving distance from the centroid of each census tract to the three similar bike parks and the comparative distance to the proposed project location. Travel distances are estimated by geospatial analysis and are not travel distances of actual trips that were made.

Response 12. The comment suggests that special event VMT analysis should be considered.

The VMT analysis is performed for an average weekday as required by the City's VMT Guidelines. Special events occur infrequently as compared to daily use of the park. In addition, weekend analysis beyond what is typically analyzed has been provided in the VMT Assessment.

Park trip generation has been estimated for the project based on our and the City's experience with other park projects, taking into account the various proposed features such as hiking trails, open fields, playgrounds, etc. The bike park was called out and quantified separately because it is a specialty use.

Per the city's Transportation Impact Analysis Guidelines, the analyses were based the peak hour of the adjacent roadway network which may differ from the peak period(s) of the project site. The comment is correct that the peak use is not accounted for, but that is by design. It is generally understood that during peak events, traffic and/or parking conditions will be less optimal than during typical operating conditions.

Response 13. This comment is not on an environmental topic under CEQA, and as such does not raise any significant environmental issue. The city contracted with a firm to prepare VMT analysis for this city proposed project consistent with its VMT guidelines.

Response 14. This comment states that there is no justification for not using the model specified in the VMT policy.

As described in the City VMT Guidelines, the use of the San Diego Association of Governments (SANDAG) model is not required for VMT calculations. Also, as described in the OPR technical advisory: "Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT...;" therefore, different types of models could be used for the VMT estimation.

The SANDAG travel demand model is a regional model that provides planning level travel behavior information for typical/standardized land uses. The model is calibrated to household travel behavior, daily roadway counts, and transit ridership information, it is not calibrated or validated for unique land use types or projects that generate a relatively small amount of daily traffic (as described in the SANDAG model validation reports). The SANDAG model includes generic park land uses that are not well defined and rely on generic trip generation from national data sources.

The SANDAG model is a simulation model, each individual model run (with identical inputs) produces different results. The difference in results is known as "model noise." SANDAG performs sensitivity tests to determine how different various metric results with identical inputs are. Currently, SANDAG and the Institute of Traffic Engineers San Diego Task Force has identified that project generating less than 2,400 daily trips do not need to perform model runs because they are within the "model noise." Based on the average trip length (for all trips) within the San Diego Region of 7 miles, 2,400 daily trips can be converted to approximately 17,000 VMT. Using the SANDAG model for a unique project, that doesn't generate above 2,400 daily trips and uses the total VMT metric may result in a total VMT that is within the "model noise." The proposed project is expected to generate 447 weekday round trips (894 trip ends) and change VMT by approximately 3,000 to 7,500 daily VMT, which is well within the "model noise."

State of the practice for determining travel characteristics of proposed land uses is to collect data for similar land uses. For typical/standard land uses it is common practice to use standardized information from a travel demand model, trip generation manual, etc. since the travel characteristics are well understood and have been shown to be consistent across geographies. For unique land uses, the state of the practice is to collect land use specific information if available. In the proposed project's case, "big data" was used to understand the travel characteristics of the unique bike park amenities of the proposed project. As mentioned, the other amenities provided at the project are typical locally serving park amenities.

Consistent with the City's VMT Guidelines, a project specific sketch model was used to evaluate the change in regional VMT due to the proposed project. The sketch model considers actual travel behavior information for similar parks and the proximity of Carlsbad residents to existing parks versus the proposed project.

Response 15. The comment states that the unique characteristics of the park would generate new trips for both residents of the city and non-residents.

The project's users were classified into three categories including general park users, bike park users, and curious users. Curious users that are brand new park trips may slightly increase regional VMT; however, given that this sub-group is expected to be small, the increase in VMT would be offset by the reduction in VMT due to general park users and bike park users. User attractions due to the park views and park unique components are accounted for in the Curious User category.

The VMT analysis of the project is done conservatively and presents a worst case scenario analysis (which overstates VMT estimates). The analysis does not account for users that will walk/bike to the park (all visitors are assumed to drive). In addition, the park location is already being used for picnicking, enjoying nature, etc.; however, a trip reduction was not assumed for existing users of the park.

Response 16. The comment suggests that special event VMT analysis should be considered.

Please see response to comment 12 of this Letter.

Response 17. The comment states that the City should be setting the example for the best way to design projects to reduce VMT and GHG.

The comment provides an opinion on the design of city projects and is noted.

Response 18. This comment states that the Project could potentially result in cumulative impacts related to greenhouse gas (GHG) emissions. As described in Table 8 of the IS/MND, the Project would result in a net reduction in GHG emissions by meeting the demand for recreational uses local to nearby communities thus minimizing vehicle travel and associated GHG emissions to recreational resources located further away; therefore, the Project is not considered to have cumulatively considerable impacts related to GHG emissions.

Response 19. The comment points out a typographical error in the number of parking spaces discussed in the Biological Technical Report. The correct number of parking spaces is described on page 3 of the Initial Study.

Response 20. The comment states that the Transportation Impact Study (TIS) is referenced in the IS/MND but has not been provided. In response the city provided a copy of the project's Transportation Impact Study to the commenter. The TIS is required by the city to assess non-CEQA transportation effects and ensure orderly development, public safety, adequate infrastructure, and consistency with the General Plan.

Response 21. Park trip generation has been estimated for the project based on our and the City's experience with other park projects, taking into account the various proposed features such as hiking trails, open fields, playgrounds, etc. The bike park was called out and quantified separately because it is a specialty use.

Although approximately 38.8 acres of the project site would be graded, only approximately 14.5-acres of the Project site would contain functional park amenities.

Using the 50 trips per acre from the SANDAG guide for the 14.5 functional park acres and the 5 trips per acre for a county park (undeveloped) from the SANDAG guide for the remaining 33.5 acres results in 893 daily trips.

The 838 daily trips from the Transportation Impact Study was instead calculated based on the projected number of weekday users based on the park uses to be provided. Vehicle occupancy is accounted for in the trip generation rates, and the daily trips were then estimated using information from the SANDAG Guide.

Response 22. The comment states that details of the multi-modal level of service (MMLOS) analysis are not provided in the IS/MND and that some of the street segments/intersections are exempt from analysis. The TIS has been provided for reference which includes the requested details of the MMLOS analysis. The exempt roadways facilities described in the IS/MND document are not exempt from meeting the city's MMLOS standards but are exempt from the vehicle LOS standards as approved by City Council.

Response 23. The comment states alternative modes of transportation are inaccurately evaluated in the TIS. This comment is referring to non-CEQA related analysis from the TIS which was not included in the IS/MND document as is not required for CEQA purposes. However it should be noted that the Transit LOS analysis has been updated in the TIS based on the headways and route characteristics provided in the latest North County Transit District (NCTD) scheduling data and is provided as an attachment to this Final IS/MND. The revised Transit LOS with the addition of benches will continue to result in an acceptable Transit LOS A once the bench amenity is added to each stop using the City's established methodology, consistent with the prior findings.

Response 24. The comment states that the project will require additional actions to reduce the impacts by improving alternative transportation and reducing the need for auto trips. The project will be required to implement TSM/TDM mitigation consistent with General Plan Mobility Element Polices 3-P.9 and 3-P.11 to help reduce the need for single occupancy vehicle trips and encourage the use of alternative modes of transportation.

Response 25. The comment asked what is the projected mode split to access the site and how is that related to design features. Mode split is not part of required analysis, and it is unknown what percentage of trips to/from the park will be via bike, walking, or transit. The parking demand was calculated based on the anticipated demand assuming a worst-case scenario that all trips would be made via vehicle. Parking demand by time of day was collected for nearby park sites and was used to estimate peak parking demand for the proposed project.

Response 26. See response to #24 above.

Response 27. The comment suggests that the IS/MND, TIS, and VMT analyses be revised. This comment is noted; however, none of the comments raise a significant environmental issue and require amendments to these analyses for the reasons stated in this response to comments document.

Letter D

SIERRA CLUB
SAN DIEGO CHAPTER

SIERRA CLUB
COASTERS
NORTH COUNTY COASTAL GROUP
Explore, Enjoy & Protect the Planet

April 10, 2022

Mr. Eric Lardy
Planning Department, City of Carlsbad
Via email eric.lardy@carlsbadca.gov
Subject: Sierra Club San Diego Comments on MND for Veteran's Park

Dear Mr. Lardy:

Sierra Club San Diego, as well as the Sierra Club Coastal Group (Coasters) are pleased to see you positioned as Principal Planner for the City of Carlsbad. Sierra Club notes your extensive experience with the County of San Diego regarding Senate Bill 743 (Steinberg, 2013), along with the updated California Environmental Quality Act (CEQA) Guidelines adopted, including the Guidelines section implementing Senate Bill 743 (§ 15064.3), which went into full effect July 1, 2020. As you are aware, the Governor's Office of Planning and Research (OPR) continues to supply ongoing guidance.

A particularly critical aspect of OPR's current guidance reflects the need to utilize the Vehicle Miles Traveled (VMT) findings of the Regional Transportation Planning Organization, sometimes referred to as the metropolitan planning organization. In the case of the entire San Diego Region, this agency is the San Diego Association of Governments, commonly known as SANDAG. Mr. Lardy, Sierra Club believes your background prepares you to save the City of Carlsbad large blocks of time and expense in pursuing a CEQA certified Veteran's Park project. In doing so, we ask that you endorse and utilize the following Sierra Club comments. We consider Veteran's Park a high priority project demanding the most diligent standards of environmental oversight. As detailed below there are currently significant obstacles to project implementation.

The courts have supported the use of MNDs when the Lead Agency has been careful neither to ignore substantial evidence of one or more significant effects, nor attempted to defer mitigation. (From State of California, Mitigated Negative Declarations, CEQA Advice Series, Dec 2004)

There is substantial evidence that the park will create much greater Vehicle Miles Traveled (VMT) than the report concluded, resulting in a significant increase in greenhouse gas generation (GHG). 1

Unreasonable and unsubstantiated assumptions were used in the VMT analysis. These assumptions are:

· This project is unique and therefore the SANDAG model for VMT is not appropriate.

The assessment states that the SANDAG Regional Travel Demand Model is not sensitive enough to use and would not accurately capture the nuances of the project. The justification for not using the SANDAG model is not explained with any additional data or facts. Rather, a singular, unique model was developed especially for this project which uses unsupported "engineering judgment" for projecting what the mix of users will be. The projected users and where their trips will originate is one of the key factors in the VMT calculations. 2

· This project will not attract new park users in the community

This park will provide several features that will attract new users and additional trips. The bike park and Veteran's Memorial will be new features not currently available in any parks in Carlsbad. Special events will also be held in the new park and several other amenities will be available. It will also be a large, regional park with spectacular views of the ocean. With these new features, and the other amenities, it is unreasonable to assume that the large majority of visitors driving to the park will be users that currently go to other parks and live nearby. 3

Ethics Question

Sierra Club is also concerned that the relationship between the city and its consultant for the assessment. Carlsbad recently adopted changes to its ethics policy that make it a violation for consultants who are contracted to develop city guidelines and policies to also do analysis of project compliance with the same guidelines. Fehr and Peers was the consultant to Carlsbad for developing modifications to their VMT and TIS guidelines. Under the new policy, Fehr and Peers preparing this VMT assessment would be an ethics violation. We agree with the intent of the new ethics policy and are therefore deeply concerned that the assessment was produced in this manner. 4

In conclusion we believe that there is substantial evidence that significant factors affecting the VMT have been ignored and that faulty assumptions were used which resulted in an assessment that negates any need for mitigation.

We urge the City of Carlsbad to redo the VMT and TIS analysis for this project and properly address the GHG that will be added with this major new park.

Sincerely,

George Courser, Chair, Conservation Committee, Sierra Club San Diego Chapter
Barbara Collins, Sierra Club North County Coastal Group Executive Committee Member

Response to Comment Letter D

Response 1. The comment states that there is "substantial evidence that the park will create much greater Vehicle Miles Traveled (VMT) than the report concluded," but no evidence was presented. VMT analysis is performed using the best available data and evidence in accordance with City VMT Guidelines, OPR Technical Advisory guidance, and the state of the practice. Responses provided for questions 2 and 3 provide further information about the analysis performed for the proposed project.

Response 2. This comment states that not enough data and facts are provided to justify why the SANDAG travel demand model was not being used for this project. Please see response to comment 14 in Letter C.

Response 3. This comment states that it is not reasonable to assume that most visitors driving to the park will be users that currently go to other parks and live nearby. Please see responses to comments 9, 10, and 15 in Letter C.

Response 4. This comment is not on an environmental topic under CEQA, and as such does not raise any significant environmental issue. The city contracted with a firm to prepare VMT analysis for this city proposed project consistent with its VMT guidelines.

Letter E

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

April 11, 2022

Eric Lardy
Principal Planner
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008
Eric.Lardy@carlsbadca.gov

Subject: Veteran Memorial Park (PROJECT), Mitigated Negative Declaration (MND), SCH #2022030349

Dear Mr. Lardy:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced MND, dated March 2022, for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of Carlsbad (City) is the only City under the subregional North County Multiple Habitat Conservation Program (MHCP) that has an approved and permitted Subarea Plan (The City of Carlsbad Habitat Management Plan (HMP)). The City adopted their HMP in December 1999; the Wildlife Agencies (jointly, CDFW and the U.S. Fish and Wildlife Service (USFWS)) granted final approvals, including an Implementing Agreement,

[1] CEQA is codified in the California Public Resources Code in Section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with Section 15000.

in November 2004.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Carlsbad

Objective: The Project proposes to develop a public park on 38.82 acres of a 93.62-acre parcel, which would include a Veterans memorial plaza/gathering area, playgrounds, a bike park, formal picnic areas, passive recreation areas, outdoor exercise and education areas, open turf, and multi-use trails. Project activities include vegetation clearing, grading, landscaping, installing buffers and fencing between the park and preserve areas. The Project's impact footprint of 38.82 acres is slightly larger than the actual grading footprint (37.1 acres) because it incorporates the impacts of trails and indirect impact buffers. The remaining 43.37 acres on the eastern half of the Project site will be preserved as HMP hardline preserve (Veterans Park Preserve and Macario Canyon Preserve). The Project will also require a HMP Minor Amendment to adjust the HMP hardline preserve boundary because the Project will encroach into a portion of the existing preserve's disturbed habitat on the south side of the property (3.36 acres, 0.2 of which are coastal sage scrub). In exchange, the Project will add 12.86 acres to the HMP hardline, including 10.13 acres of higher quality coastal sage scrub, thus resulting in a net increase of 9.50 acres hardline. On March 16, 2022, the City emailed the Wildlife Agencies a concurrence request to formally facilitate amending this boundary change. The Project proposes to restore 1.88 acres of disturbed habitat as Diegan coastal sage scrub on-site and to mitigate non-native grassland impacts by debiting the appropriate acreage from the City's Lake Calavera Mitigation Parcel. In addition, impacts to 0.10 acre of willow-dominated riparian scrub will be mitigated with unused wetland creation credits the City previously purchased from the North County Habitat Bank.

Location: The Project site is located southeast of the Faraday Avenue/Whitman Way intersection in the City of Carlsbad in San Diego County, California. The Project site is generally undeveloped except for an existing receiver pit for the Carlsbad desalination project pipeline located approximately 430 feet southeast of Whitman Way. Surrounding land uses include residential homes, the Interstate 5/Cannon Road interchange to the east, and Agua Hedionda Lagoon 0.5mile to the northwest.

Biological Setting: Per the Biological Technical Report (BTR), the Project's development area consists of non-native grassland (35.35 acres) that is mowed annually, Diegan coastal sage scrub (12.43 acres) on two islands and along the northern boundary, and riparian scrub (0.19 acre). The HMP hardline preserve area consists of Diegan coastal sage scrub (35.68 acres), with smaller patches of southern maritime chaparral (2.12 acres), oak woodland (0.12 acre) and non-native grassland (4.71 acres). PSOMAS biologists conducted biological surveys on the Project site in February, April, and May of 2019. Three special status plant species were observed during the field survey: California adolphia (*Adolphia californica;* California Rare Plant Rank (CRPR) 2B.1), summer holly (*Comarostaphylis diversifolia ssp. diversifolia*; CRPR 1B.2), and Nuttall's scrub oak (*Quercus dumosa*; CRPR 1B.1). These plant species, however, were only observed in the preserved areas of the Project. (PSOMAS biologists, February 2022).

In addition, protocol-level surveys for coastal California gnatcatcher (*Polioptila californica californica*; federal Endangered Species Act (ESA)-listed threatened; CDFW Species of Special Concern (SSC); gnatcatcher) were conducted on-site in May and June of 2019. The protocol-level surveys indicated the site is occupied, as three territories consisted of gnatcatcher pairs, which exhibited behavior consistent with breeding. Two of the three pairs had active nests which were documented with nestlings during the first focused survey. One nest was in a black sage shrub, in

the southeastern portion of the Project site and the other nest was in a California sagebrush shrub approximately 300 feet outside of the northeast boundary of the Project's development area. While this nest location was outside of the Project site boundary, the territory of the pair extended into the Project site and included the coastal sage scrub habitat located just within the northeastern boundary. All three territories were located within the existing HMP hardline (PSOMAS biologists, February 2022). One loggerhead shrike (*Lanius ludovicianus*; SSC) was also detected during biological surveys and has the potential for nesting on the Project site; however, per the BTR's Exhibit 5 map, this individual was detected outside of the Project development area.

Additional species with the potential to occur on-site include western spadefoot (*Spea hammondii*; SSC), burrowing owl (*Athene cunicularia*; SSC), northern harrier (*Circus hudsonius*; SSC), California horned lark (*Eremophila alpestris actia;* CDFW Watch List (WL)), monarch (*Danaus plexippus*), golden eagle (*Aquila chrysaetos*; CDFW Fully Protected (FP) Species), Cooper's hawk (*Accipiter cooperii*; WL), and white-tailed kite (*Elanus leucurus*; FP Species). Bat species that may occur on or adjacent to the Project site for foraging and/or roosting include pallid bat (*Antrozous pallidus*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), hoary bat (*Lasiurus cinereus)*, and Yuma myotis (*Myotis yumanensis*).

Timeframe: The Project is expected to span approximately 20 months and is planned to begin in Summer 2023.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately avoiding, minimizing, and identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The MND should provide complete disclosure of the Project's potential impacts on biological resources. [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. In addition, the MND should follow the conservation guidelines and mitigation ratios outlined in the MHCP and HMP.

COMMENT #1: White-tailed Kite Avoidance

Mitigation Measure BIO-4 (MM BIO-4) and Mitigation Measure BIO-5 (MM BIO-5) do not adequately avoid impacts to white-tailed kite, a CDFW Fully Protected species (Fish & G. Code, § 3511(b)(6)). A Fully Protected species may not be taken at any time and loss of any individual kites, eggs, or nestlings would be considered significant. As written, MM BIO-4 states that Project construction activities will occur outside of the bird-breeding season (February 15–August 31), if feasible. However, if the breeding season cannot be avoided and nests of listed birds, migratory birds, raptors, or other special-status species are located, they shall be fenced with a protective buffer of 500 feet. All construction activity shall be prohibited within this area until the birds have fully fledged, or the nest is determined to no longer be active. In addition, BIO-5 incorporates measures to reduce impacts from Project lighting, site cleanliness, and pets and exotic species that may occur on the Project site. However, the implementation of MM BIO-4 and MM BIO-5 may not be sufficient to make impacts to white-tailed kite less than significant. Per the MND, page 28, white-tailed kite has the potential to forage and nest in the Project area.

1

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure #1:

To reduce impacts to less than significant: In addition to the mitigation proposed in MM BIO-4 and MM BIO-5, CDFW recommends that the Project proponent conduct focused surveys for white-tailed kite within the Project area to adequately avoid impacts to the species and active nests that may occur in the Project area.

CDFW recommends adding an additional white-tailed kite mitigation measure that states:

1 cont.

"For each year in which Project activities commence between February 1 and September 15, a focused survey for white-tailed kite nests on the site and within 0.25 mile of the site will be conducted by a qualified biologist no greater than 15 days prior to the start of construction work (including clearing and grubbing). If white-tailed kites are found, the qualified biologist shall develop a species-specific avoidance plan for CDFW review and approval. Any measures approved in the avoidance plan will be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, nothing further will be required. If active nests are found during the focused survey, Project personnel shall immediately notify CDFW and establish a minimum 500' no-work buffer zone until the qualified biologist determines, and CDFW confirms, that all chicks have fledged and are no longer reliant on the nest site. If a lapse in Project-related activities of 14 days or longer occurs, another focused survey is required before Project activities can be reinitiated."

COMMENT #2: Bats

Per the BTR, page 7, various bat species may use any portion of the Project site as foraging habitat, including pallid bat, Townsend's big-eared bat, western mastiff bat, hoary bat, and Yuma myotis. During the bat maternity season, bats are known to form colonial maternity roosts where multiple pregnant females give birth to flightless pups and rear the young. If there were a maternity roost present in the trees, impacts to that roost site would be significant. Clearing of vegetation occupied by bats would result in direct take of the species. Modifications to roost sites can have significant impacts on bat usability of a roost and can impact bat fitness and survivability (Johnston et al. 2004). Extra noise and vibration can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004). Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Bats with a California SSC status meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines § 15065). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines § 15065).

2

Mitigation Measure #2: BIO-2 Pre-Construction Bat Acoustic Survey

To reduce impacts to less than significant: Because various bat species have the potential to occur within the Project area, CDFW recommends that the Project proponent conduct two sets of bat surveys prior to the initiation of the Project. The first survey should occur during the bat roosting season within all suitable habitat to determine presence/absence of bat species and analyze the potential significance of tree removal. The second (pre-construction) survey should be conducted

no less than 30 days prior to tree removal, to ensure no bats are roosting (e.g., day, night, maternity roosts) within the trees at the time of removal.

CDFW recommends the following amended language to BIO-5, E, to adequately survey and avoid Project impacts to bat species that may occur within the Project corridor:

"A qualified biologist with expertise and experience conducting bat surveys, shall be retained by the City as a Designated Bat Biologist. CDFW recommends the Designated Bat Biologist conduct a bat survey within the Project area (plus a 100-foot buffer as access allows) to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees within the Project area. The survey shall occur during the roosting season (approximately March-September), using acoustic technology and emergence counts to maximize detection of bats on-site. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

~~Prior to any tree removal, a qualified bat biologist will survey the trees proposed for removal for potential to support tree-roosting bat species.~~ No more than 30 days prior to vegetation removal, the Designated Bat Biologist will conduct a pre-construction bat survey within all trees or structures that provide suitable bat roosting habitat. If a maternity roost is determined~~-~~present within a tree to be removed, ~~tree removal shall only occur between September 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to August 31).~~ a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active.

~~Trees to be removed shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours shall elapse prior to such operations to allow bats to escape."~~

2 cont.

COMMENT #3 Exotic Species

Per the MND, MM BIO-5c, states that a qualified biologist will relocate exotic species permanently from the Project site to an appropriate open space area to be coordinated with the City. CDFW does not recommend relocation as a method of exotic species control. CDFW recommends that the City provide further clarification as to the type of exotic species observed or expected on-site, methods of relocation, proposed open space relocation areas, and justification for why these exotic species are being relocated instead of removed permanently from the environment.

3

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address:

4

CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 4 cont.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 5

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alison Kalinowski, Environmental Scientist, at Alison.Kalinowski@wildlife.ca.gov.

Sincerely,

DocuSigned by:
David Mayer
D70084520375406...

David A. Mayer
Environmental Program Manager
South Coast Region

ec: CDFW
David Mayer, San Diego – David.Mayer@wildlife.ca.gov
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
Alison Kalinowski, San Diego – Alison.Kalinowski@wildlife.ca.gov
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
Jonathan Snyder, USFWS – Jonathan_D_Snyder@fws.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

REFERENCES

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California Office of Planning and Research (COPR). 2009 or current version. CEQA: California Environmental Quality Act. Statutes and Guidelines, § 21081.6 and CEQA Guidelines, §15097, §15126.4(2).

Johnston D., Tatarian G., and Pierson E. 2004. California Bat Mitigation Techniques, Solutions and Effectiveness. Available from: http://www.wildliferesearchassoc.com/wpcontent/uploads/2017/05/California_Bat_Mitigation_CalTrans_2004-1.pdf.

PSOMAS Biologists. February 2022. Veterans Memorial Park Project Draft Biological Technical Report.

PSOMAS Biologists. March 2022. Veterans Memorial Park Project Draft Initial Study/Mitigated Negative Declaration.

Response to Comment Letter E

Response 1. This comment suggests the addition of a white-tailed kite mitigation measure to further reduce harm to this species. As requested, this measure has been added as **MM BIO-9** to the Mitigation Monitoring and Reporting Program (MMRP) for the Project, with minor edits. **MM BIO-9** reads as follows:

"**MM BIO-9**: For each year in which Project activities commence between February 1 and September 15, a focused survey for white-tailed kite nests within the Project site and within 500-feet of the Project site will be conducted by a qualified biologist no greater than 15 days prior to the start of construction work (including clearing and grubbing). If white-tailed kites are found, the qualified biologist shall develop a species-specific avoidance plan for CDFW review and approval. Any measures approved in the avoidance plan will be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, nothing further will be required. If active nests are found during the focused survey, Project personnel shall immediately notify CDFW and establish a minimum 500' no-work buffer zone until the qualified biologist determines, and CDFW confirms, that all chicks have fledged and are no longer reliant on the nest site. If a lapse in Project-related activities of 14 days or longer occurs, another focused survey is required before Project activities can be reinitiated."

Response 2. This comment suggests the addition of pre-construction bat surveys to further reduce harm to bat species. As requested, **MM BIO-5(d)** has been amended in the MMRP for the Project to account for these requested clarifications.

"**MM BIO-5(d**): A qualified biologist with expertise and experience conducting bat surveys shall be retained by the City as a Designated Bat Biologist. A bat survey will be conducted within the Project site to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees within the Project area. The survey shall occur during the roosting season (approximately March-September) using acoustic technology and emergence counts. Also, no more than 30 days prior to vegetation removal, the Designated Bat Biologist will conduct a pre-construction bat survey within all trees or structures that provide suitable bat roosting habitat within the Project site. If a maternity roost is determined to be present within a tree to be removed, a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active."

Response 3. This comment requests clarification regarding **MM BIO-5(c)**, which addresses exotic species. **MM BIO-5** has been modified to delete the text in question.

Response 4. This comment notes that any special status species and natural communities to the California Natural Diversity Database (CNDDB). This comment is noted, and applicable environmental data has been previously transmitted as required.

Response 5. This comment states that an environmental filing fee will be required for the Project. This comment is noted, and the filing fee will be paid by the City after Project approval when the Notice of Determination (NOD) is filed.

Letter F

From: Diane Nygaard
Sent: Monday, April 11, 2022 10:59 AM
To: Eric Lardy
Subject: Comments on MND for Veterans Memorial park

Mr. lardy

Below are my individual comments on the MND for this project :

Transportation is the largest source of Green House gas(GHG) emissions in the state of California and in our San Diego region. The state recognized years ago that improving fleet and fuel efficiency alone was not enough to reach GHG reduction targets for transportation- we need to reduce the need to drive. SB 743 was adopted in 2013, as the key way to achieve that. The CEQA guidelines to implement SB 743 were adopted in 2018.

Carlsbad was one of the first cities in our region to adopt a local implementing ordinance for SB 743. Carlsbad is also one of the cities that followed the OPR guidance for establishing a screening threshold and set a high threshold for determining if a VMT study was required, 110 ADT. Carlsbad also adopted a TDM program as part of their CAP action plan to reduce community wide GHG emissions. All of this would give the appearance that there is rigorous screening and enforcement of actions to reduce GHG emissions from the transportation sector in the city of Carlsbad. 1

However the review of the VMT analysis and associated Transportation Impact Study(TIS) for the Veteran's Park Project MND makes it abundantly clear that is not the case. The intent of the law has been completely subverted through faulty analysis of VMT, gross errors in the TIA, and lack of meaningful TDM. The result of all of that is significant adverse impacts from transportation that have not been accurately identified, analyzed or mitigated. The fact that this is a city project makes this even more concerning. How can the city hold any developer in the city to standards that it fails to meet for its own projects?

The following are just a few examples for the conclusion that the VMT and TIS for this project need to be redone:

- No substantial evidence that this is a " unique" project that warrants developing a unique model instead of using the SANDAG model for VMT in the adopted city of Carlsbad VMT guidelines. 2

- No substantial evidence in support of the "unique model" developed for this single project. 3

- Using unsupported assumptions about trip rates that grossly under-report the number of trips . This is a 38 acre developed city park that per the SANDAG Not So Brief Guide results in 50 trips/acre(1900 ADT) plus an additional factor for the undeveloped portions that is somewhere between 20 trips/acre for a regional park and 5/acre for a county park for the 53 undeveloped acres - not the 838 trips /weekday that were assumed. 4

- Invalid assumptions that the majority of trips are re-distributed and of shorter trip length than they would be without the project. This park is designed to address future minimum park acres required by the city's Growth Management Plan through 2035. It provides unique features that do not exist in other local parks. It is not closer than other city parks for the majority of city residents. The majority of all trips to the site, whether redistributed or new,cannot be of shorter length than those trips would be without the project. 5

- Alternative modes of transportation are inaccurately evaluated which then falsely conclude they meet required performance standards. The evaluation for public transit is particularly concerning. The key factors that determine transit use are proximity and frequency of service. The existing service is evaluated at LOS F. It is then 6

1

assumed that adding a concrete pad and bench will increase this to LOS A. Route # 444 is essentially a weekday only, peak hour service. All of the park amenities (except for entry trail connection) are well over 1/4 mile from the bus stop. There is only one trip in the am peak and one in the pm peak that is even within a 30 min headway. There are hours of the day with no bus service- and there is none on weekends when park use is projected to be the highest. There is no basis for the conclusion that adding a pad and bench would result in such a dramatic change. in LOS.

6 cont.

- The related section of Cannon Rd is exempt from roadway mitigation under the Mobility Plan because it was already at LOS F when the last General Plan was adopted. That requires additional actions to reduce the impacts by primarily improving alternative transportation and reducing the need for auto trips. Failing to do so is not consistent with the adopted General Plan mobility requirements and results in further cumulative impacts to GHG that have not been addressed.

7

I urge you to redo the VMT and TIS analysis for this project- using the correct trip generation rates and the SANDAG model included in the city's adopted VMT analysis guidelines and properly address the GHG that will be added with this major new park.

Diane Nygaard

6

Response to Comment Letter F

Response 1. This comment is an introduction to and summary of the comments that follow, which are responded to in detail below. It relates to a faulty VMT analysis and gross errors in the TIA and lack of meaningful TDM. The VMT analysis was performed consistent with the state of the practice for VMT analysis and per the City of Carlsbad's VMT Analysis Guidelines, September 2020 and OPR Technical Advisory. Responses to comments 2, 3, and 5 provide additional information.

Response 2. This comment states that not enough evidence is provided that warrants developing a unique model instead of using the SANDAG travel demand model. Please see response to comment 14 in Letter C.

Response 3. This comment states that no substantial evidence is provided in support of the unique model developed for this project. Please see response to comment 14 in Letter C.

Response 4. Although approximately 38.8 acres of the project site would be graded, only approximately 14.5-acres of the Project site would contain functional park amenities.Using the 50 trips per acre from the SANDAG guide for the 14.5 functional park acres and the 5 trips per acre for a county park (undeveloped) from the SANDAG guide for the remaining 33.5 acres results in 893 daily trips. The 838 daily trips from the TIS was instead calculated based on the projected number of weekday users based on the park uses to be provided. Vehicle occupancy is accounted for in the trip generation rates, and the daily trips were then estimated using information from the SANDAG Guide.

Response 5. This comment relates to the validity of the project's assumption that the majority of park trips are redistributed and have shorter trip lengths. Please see response to comments 9,10, and 15 in Letter C.

Response 6. The concerns are noted. However, the City's transit LOS calculation sheet considers transit service during the peak weekday periods. The Transit LOS analysis has been updated based on the headways and route characteristics provided in the latest NCTD scheduling data and is provided as an attachment. When corrected, the Transit LOS with the addition of benches will continue to result in an acceptable Transit LOS A once the bench amenity is added to each stop using the City's established methodology.

Response 7. Overall, the Project is expected to reduce VMT by providing park amenities closer to existing developments. The park includes design features that will also provide bicycle and pedestrian connections to the adjacent roadways and trails, which may help encourage walking and biking trips.

Letter G

SIERRA CLUB
SAN DIEGO CHAPTER

11 April 2022

City of Carlsbad
Attn: Eric Lardy
Via email to: Eric.Lardy@carlsbadca.gov & planning@carlsbadca.gov

Dear Mr. Lardy:

Transportation is the largest source of Green House gas(GHG) emissions in the state of California and in our San Diego region. The state recognized years ago that improving fleet and fuel efficiency alone was not enough to reach GHG reduction targets for transportation- we need to reduce the need to drive. SB 743 was adopted in 2013, as the key way to achieve that. The CEQA guidelines to implement SB 743 were adopted in 2018.

Carlsbad was one of the first cities in our region to adopt a local implementing ordinance for SB 743. Carlsbad is also one of the cities that followed the OPR guidance for establishing a screening threshold and set a high threshold for determining if a VMT study was required, 110 ADT. Carlsbad also adopted a TDM program as part of their CAP action plan to reduce community wide GHG emissions. All of this would give the appearance that there is rigorous screening and enforcement of actions to reduce GHG emissions from the transportation sector in the city of Carlsbad.

However the review of the VMT analysis and associated Transportation Impact Study (TIS) for the Veteran's Park Project MND makes it abundantly clear that is not the case. We find that the intent of the law has been completely subverted through faulty analysis of VMT, gross errors in the TIA, and lack of meaningful TDM. The result of all of that is significant adverse impacts from transportation that have not been accurately identified, analyzed, or mitigated. The fact that this is a city project makes this even more concerning. How can the city hold any developer in the city to standards that it fails to meet for its own projects?

1

8304 CLAIREMONT MESA BLVD. # 101, SAN DIEGO CA 92111
858-569-6005, WWW.SANDIEGOSIERRACLUB.ORG

The following are just a few examples for our conclusion that the VMT and TIS for this project need to be redone:

- No substantial evidence that this is a " unique" project that warrants developing a unique model instead of using the SANDAG model for VMT in the adopted city of Carlsbad VMT guidelines. 2
- No substantial evidence in support of the "unique model" developed for this single project. 3
- Using unsupported assumptions about trip rates that grossly under-report the number of trips. This is a 38-acre developed city park that per the SANDAG Not So Brief Guide results in 50 trips/acre (1900 ADT) plus an additional factor for the undeveloped portions that is somewhere between 20 trips/acre for a regional park and 5/acre for a county park for the 53 undeveloped acres - not the 838 trips /weekday that were assumed. 4
- Invalid assumptions that the majority of trips are re-distributed and of shorter trip length than they would be without the project. This park is designed to address future minimum park acres required by the city's Growth Management Plan through 2035. It provides unique features that do not exist in other local parks. It is not closer than other city parks for the majority of city residents. The majority of all trips to the site, whether redistributed or new, cannot be of shorter length than those trips would be without the project. 5
- Alternative modes of transportation are inaccurately evaluated which then falsely conclude they meet required performance standards. The evaluation for public transit is particularly concerning. The key factors that determine transit use are proximity and frequency of service. The existing service is evaluated at LOS F. It is then assumed that adding a concrete pad and bench will increase this to LOS A. Route # 444 is essentially a weekday only, peak hour service. All of the park amenities (except for entry trail connection) are well over 1/4 mile from the bus stop. There is only one trip in the am peak and one in the pm peak that is even within a 30 min headway. There are hours of the day with no bus service- and there is none on weekends when park use is projected to be the highest. There is no basis for the conclusion that adding a pad and bench would result in such a dramatic change. in LOS. 6

2

- The related section of Cannon Rd is exempt from roadway mitigation under the Mobility Plan because it was already at LOS F when the last General Plan was adopted. That requires additional actions to reduce the impacts by primarily improving alternative transportation and reducing the need for auto trips. Failing to do so is not consistent with the adopted General Plan mobility requirements and results in further cumulative impacts to GHG that have not been addressed.

7

We urge you to redo the VMT and TIS analysis for this project- using the model included in the city's adopted VMT analysis guidelines and properly address the GHG that will be added with this major new park.

Sincerely,
David Grubb, Transportation Chair, Sierra Club San Diego

3

Response to Comment Letter G

Response 1 through 7. Comments are the same as Letter F comments. See Letter F for responses to these comments.

Letter H

April 11, 2022

Re: Veterans Memorial Park project Mitigated Negative Declaration (MND)

Below is a summary of my public comments on this project, followed by details. Points 1-3 question the validity of the vehicle miles traveled (VMT) calculation, which could have a significant environmental effect, if done in an unbiased manner (MND XVII.b). Points 4-5 point out flaws in the mobility level of service (LOS) analyses, which conflict with Carlsbad's General Plan Mobility Element and Growth Management Ordinance (MND XVII.a).

Summary

1. Fehr & Peers, the consulting firm that performed the VMT analysis for this project, has a significant conflict of interest that taints the MND. They developed the VMT Analysis Guidelines and they act as a reviewer of submitted VMT analyses for the City, but they also have represented several project applicants in the submission of VMT analyses (including this project). They even represented and submitted a VMT analysis for a developer while they were still developing the guidelines with City staff. 1
2. Given its size and features, the City and the San Diego Association of Governments (SANDAG) have designated the park as a "regional park" to "serve regional needs," including unique bike fitness/obstacle/parkour courses, as well as other unique hiking/trail and memorial amenities. The City's "Veterans Memorial Park Master Plan" and public presentations have expanded upon this regional designation by highlighting its location as serving all quadrants of the City, including distant areas. 2
3. Despite all the promotion of the uniqueness of this regional-serving park and the City's stated goal of **increasing** people's active recreation options, the Fehr & Peers VMT analysis makes the sad and highly questionable claim that about 96% of trips to the new park will just be redistributed trips that people are already making to other area parks—concluding that no measures to enhance non-automobile travel to the park are necessary under CEQA. 3
4. The transit LOS analysis in the project's Transportation Impact Study (TIS) claims numerous sets of points for bus frequency headways and route characteristics for North County Transit District (NCTD) Route 444 that are simply not accurate. This includes claiming points for weekend bus service, even though that route does not even operate on weekends. It includes the ridiculous claim that simply adding benches to bus stops that currently consistent only of signs in the ground with zero current ridership will convert them from failing LOS "F" grades to LOS "A" grades with the maximum possible 100 points. 4
5. The TIS also claims that no intersection improvements are warranted at the Faraday Avenue/Cannon Road intersection. However, the City's Transportation Impact Analysis (TIA) Guidelines indicate that a dedicated right-turn lane from northeast-bound Cannon Road to southeast-bound Faraday Avenue is warranted (ideally, with the bike lane moved to the left). In addition, a dedicated left-turn lane from northwest-bound Faraday Avenue to southwest-bound Cannon Road is warranted. A more detailed intersection analysis should be performed to study this. 5

1

VMT transportation consultant conflict of interest

Transportation consulting firm Fehr & Peers was paid by the city to help develop our VMT Analysis Guidelines and VMT maps based on SANDAG travel demand models between December 2019 and May 2020. However, they were also paid by the developer of the West Oaks apartment project to conduct a VMT analysis in March and April of 2020 while communications were still ongoing between city staff and Fehr & Peers in developing the guidelines.

In addition, West Oaks was given special permission by staff to use Fehr & Peers' VMT analysis for their project, even though "level of service" (LOS) was still the CEQA standard at the time, and the VMT Analysis Guidelines had not undergone any public review or adoption by the Traffic & Mobility Commission and City Council.

Then, in September 2020, just two months after VMT replaced LOS as the CEQA standard, staff made a non-public change to the VMT Analysis Guidelines that opened up the VMT calculation to all sorts of custom methods. Just a few months later, Fehr & Peers submitted their VMT Analysis for the BMW Carlsbad project using a custom method, claiming that automobile dealerships were too unique a business to be handled by the SANDAG travel demand model.

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Shockingly, that analysis concluded that the regional-serving BMW project would actually reduce regional VMT, under the assumption that no new or different employees or customers would be added, despite a large expansion of the business and a certified plan to add many new employees—and despite the fact that it will displace several VMT-reducing local serving retail businesses at the project site.

Similar to the BMW project, Fehr & Peers has now used another custom method to calculate VMT for the regional Veterans Memorial Park project, concluding that it also will lead to a net decrease in regional VMT—under the assumption that it will largely only redistribute trips that people currently take to other parks—not generate new trips.

So, Fehr & Peers has been paid to develop the VMT guidelines and help the city review VMT analyses, while simultaneously being paid to represent the entities submitting those analyses. This is a huge conflict of interest. They have a biased advantage and have routinely applied custom methods and other exceptions without citing independent research.

It is my understanding that, after my complaints, the city is implementing an ethics policy to end this practice (i.e., Fehr & Peers will no longer be allowed to submit VMT analyses for projects while they are also the city's paid VMT consultant). That is welcome and appreciated. However, the VMT analysis for Veterans Memorial Park and others submitted by Fehr & Peers (past and current) are tainted by the conflict of interest.

2

Flawed assumption in VMT analysis of almost no new trips to be generated by the park

Fehr & Peers is claiming in their VMT analysis that it is their "engineering judgement" that Veterans Memorial Park will generate only 3.6% to 4.9% new trips, and the rest will just be redistributed trips (calculated from Tables 11 through 14). They also argue that the new trips likely will disappear, as well, because they will largely be due to early, temporary curiosity-seekers.

However, the Veterans Memorial Park Master Plan indicates that, because of its large size and centralized location, the park will serve all four quadrants of the city, and that it has been designated a "regional open space park" by SANDAG to "serve regional needs."

One example of this is the fact that residents of the Ponto area of Carlsbad, in the far southwestern portion of the city, have been told that the distant Veterans Memorial Park will be a substitute for a park they have been advocating in their area.

Another example is the bike park component, which will include fitness, obstacle, and parkour courses. The Fehr & Peers VMT analysis essentially assumes that the construction of these brand-new facilities will not induce any new people to start doing these bike activities or induce any additional trips by people who already engage in these activities at other distant bike parks. The analysis also seemingly ignores bike park demand that may come from north of Carlsbad, focusing instead on only a few facilities to the south.

7

The new park also will include unique hiking/trail opportunities and several other new features that the VMT analysis assumes will not attract any new park trips.

It would be very disappointing to learn that this fantastic new park will generate virtually no new park trips and no interest in new activities by residents. That underlying assumption seems unique to Fehr & Peers' VMT analysis to ensure that no traffic mitigation is mandatory, rather than being the city's actual goal of **increasing** active recreational options or the reality of a new regional park.

3

Flawed transit LOS analysis in the TIS conflicts with the General Plan Mobility Element and Growth Management Plan

There are two pairs of transit stops on Faraday Avenue that could serve the project—one pair at the western end near the intersection with Cannon Road, and other pair on the eastern side. All four of the stops currently include only a sign in the ground (see the photo below of the stop on southbound Faraday Avenue near Cannon Road as an example). Using the most recent pre-COVID NCTD data (2019), all four of these stops average **ZERO** boardings and alightings per day, despite the fact that the pair near Cannon Road is directly adjacent to a large apartment complex, and the pair to the east is adjacent to business parks.

Transit stop on southbound Faraday Avenue south of Cannon Road.

8

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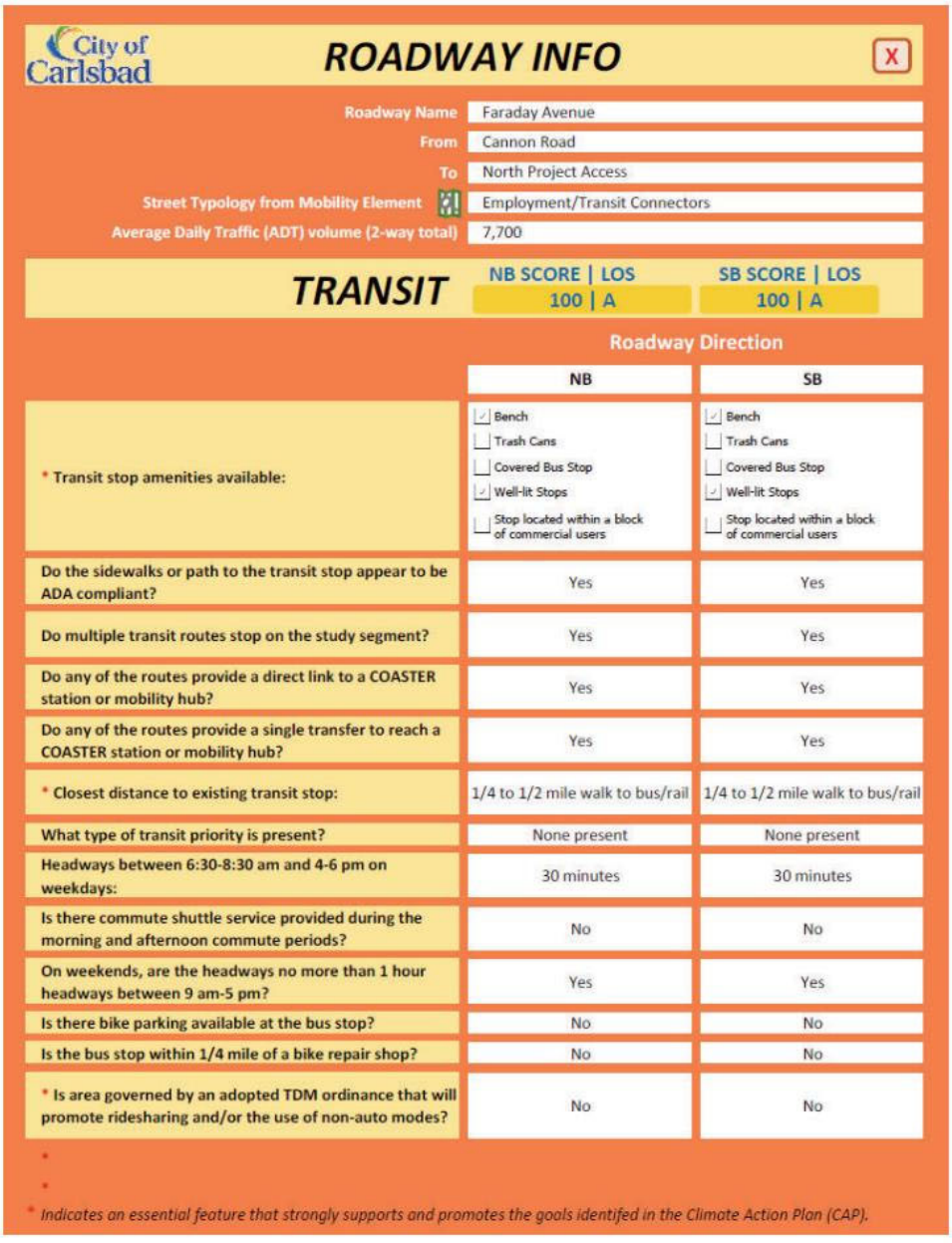
The transit LOS analysis in the Veterans Memorial Park TIS claims that simply adding a bench to each stop will elevate them from LOS "F" to LOS "A" with perfect scores of 100 (see example below). That is profoundly inaccurate and discouraging.



City of Carlsbad

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	7,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
100 | A	100 | A

	Roadway Direction: NB	Roadway Direction: SB
* Transit stop amenities available:	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* Closest distance to existing transit stop:	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	Yes	Yes
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?	No	No

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

8 cont.

In the transit LOS calculations shown above, points are claimed for 30-minute headways between 6:30-8:30a and 4-6p on weekdays, and additional points are claimed for 60-minute headways from 9a-5p on weekends. However, the stops are all on NCTD Route 444, which has very little service on weekdays, and which **does not operate at all** on weekends or holidays (see the current 4/2022 schedule below and note that service was even less frequent in 2020). **None of the headway requirements are met to deserve any of these points**, which is further exacerbated by the fact that there is no service on weekends when park trips are estimated to be at their highest.

8 cont.

444 **Carlsbad Poinsettia COASTER Connection via Faraday Ave. & Rutherford Rd.**
Conexión Carlsbad Poinsettia COASTER vía Faraday Ave. y Rutherford Rd.

See pg. 6 for Holiday schedules/Ver pág. 246 para obtener los horarios de días festivos

Monday - Friday
Northbound to Cannon Rd.
Lunes a Viernes • Dirección hacia el norte a Cannon Rd.

ARRIVING SB COASTER From Oceanside *Llegada SB COASTER desde Oceanside*	ARRIVING NB COASTER From San Diego *Llegada NB COASTER desde San Diego*	Carlsbad Poinsettia Station	Palomar Airport Rd. & Armada Dr.	College Bl. & Aston Ave.	Rutherford Rd. & Priestly Dr.	Armada Dr. & Fleet St.
COASTER	COASTER	1	2	3	4	5
7:29	7:31	7:36	7:42	7:47	7:50	8:05a
7:49	8:31	8:36	8:43	8:48	8:52	9:07
–	9:11	9:16	9:23	9:28	9:32	9:47
–	9:31	9:36	9:43	9:48	9:52	10:07

Monday - Friday
Southbound to Carlsbad Poinsettia Station
Lunes a Viernes • Dirección hacia el sur a la Estación Carlsbad Poinsettia

Armada Dr. & Fleet St.	Rutherford Rd. & Priestly Dr.	College Bl. & Aston Ave.	Palomar Airport Rd. & Armada Dr.	Carlsbad Poinsettia Station	DEPARTING NB COASTER To Oceanside *SALIDA NB COASTER a Oceanside*	DEPARTING SB COASTER To San Diego *SALIDA SB COASTER a San Diego*
5	4	3	2	1	COASTER	COASTER
3:50	4:00	4:02	4:08	4:16	4:31	4:29p
4:10	4:20	4:22	4:28	4:36	5:11	4:49
4:50	5:00	5:02	5:08	5:16	–	5:29
5:51	6:01	6:04	6:10	6:19	6:31	6:29

Route 444 does not operate on Saturdays, Sundays, or holidays.

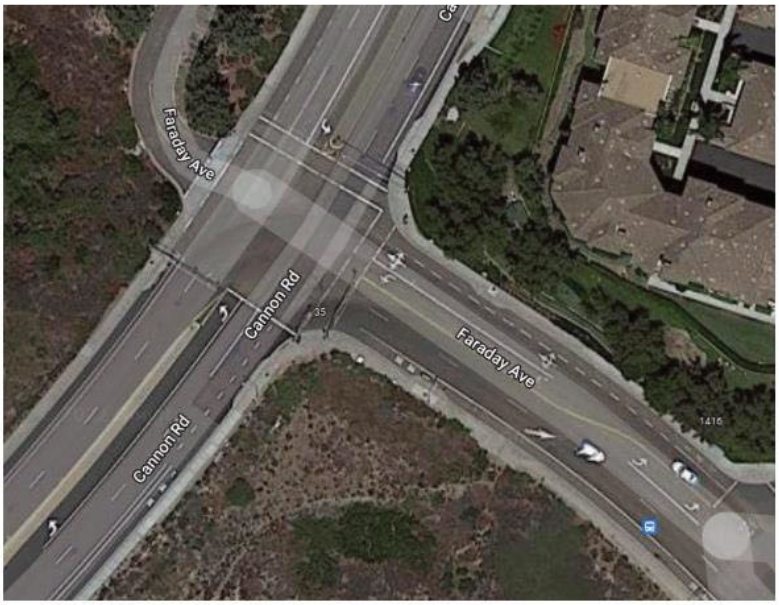
In addition, transit LOS points are claimed for having multiple transit routes, and for having both a "direct link" to a COASTER station and a "single transfer" to reach a COASTER station. Route 444 is the only route that serves this segment of Faraday Avenue, and there is only a direct link, so **the points for having multiple routes and "single transfer" are not warranted**.

Ultimately, it is ridiculous on its face that these stops will be converted from LOS "F" to a perfect score LOS "A" by the addition of a bench, given the lack of other amenities and the extremely low weekday frequency and complete lack of service on weekends.

8 cont.

Flawed vehicle turn-lane assessments in the TIS

The TIS shows that the heaviest turn volumes are at the right turn from northeast-bound Cannon Road to southeast-bound Faraday Avenue in the morning, and at the left turn from northwest-bound Faraday Avenue to southwest-bound Cannon Road in the evening (see satellite image below). The TIS suggests that no turn lane improvements are warranted.



9

However, the TIA Guidelines indicate that a dedicated right-turn lane is warranted when there are more than 150 vehicles turning right in the peak hour, and Table 6 of the TIS (reproduced below) indicates a volume of 358 right-turning vehicles from Cannon to Faraday in the peak morning hour. There is no dedicated right-turn lane there—just a dashed bike lane that vehicles can use—and the dashed portion is only 100 feet long. It is claimed in the TIS that this is an acceptable condition. However, widening to create a dedicated vehicle right-turn lane with a dedicated bike lane to the left seems warranted in that location, based on the TIA Guidelines, to make conditions safer and less congested for both vehicles and bicyclists.

7

The TIA Guidelines indicate that dual dedicated left-turn lanes are warranted when there are more than 250 vehicles turning left in the peak hour, and that the lane should be about one foot long per peak hour vehicle. Table 6 of the TIS indicates a volume of 352 left-turning vehicles from Faraday to Cannon in the peak evening hour. There is only one dedicated left-turn lane there with an adjacent shared left-turn lane. Even assuming the shared turn lane is as efficient as the dedicated turn lane (despite the fact that 10% of vehicles are not turning left from the shared line), the total storage length is only enough for 240 peak-hour vehicles.

Table 6. Turn Lane Evaluation – Cannon Road/Faraday Avenue

Movement	Volume (veh per hr)*	Threshold (veh per hr)	95th %ile Queue (ft)**	Existing Storage (ft)
EBL (Cannon Rd)	15	250 (dual LT lanes)	23	175
EBR (Cannon Rd)	358	150	N/A	N/A
WBL (Cannon Rd)	51	250 (dual LT lanes)	54	240
WBR (Cannon Rd)	6	150	N/A	N/A
NBL (Faraday Ave)	352	250 (dual LT lanes)	162	120***
NBR (Faraday Ave)	40	150	N/A	N/A
SBL (Faraday Ave)	4	250 (dual LT lanes)	N/A	N/A
SBR (Faraday Ave)	8	150	N/A	N/A

*Largest peak hour volume shown for 2024 + Project conditions
**From Synchro, left turn movements only
***Existing single exclusive lane and shared lane

9 cont.

Sincerely,

Steve Linke
Carlsbad, CA
splinke@gmail.com

Disclosure: I am Vice Chair of the Carlsbad Traffic and Mobility Commission (T&MC). Because our commission is not allowed by staff to review transportation studies for proposed developments, I am commenting here as an individual.

Response to Comment Letter H

Response 1. This comment is not on an environmental topic under CEQA, and as such does not raise any significant environmental issue. The city contracted with a firm to prepare VMT analysis for this city proposed project consistent with its VMT guidelines.

Response 2. The comment represents the commentor's opinion regarding the purpose of the park. Please see response to comment 10 in Letter C.

Response 3. This comment questions why the majority of trips to this regional-serving park will be redistributed trips. Please see response to comments 11 and 15 in Letter C.

Response 4. The Transit LOS analysis has been updated based on the headways and route characteristics provided in the latest NCTD scheduling data and is provided as an attachment. When corrected, the Transit LOS with the addition of benches will continue to result in an acceptable Transit LOS A once the bench amenity is added to each stop using the City's established methodology.

Response 5. The TIS does state that an eastbound right turn lane on Cannon Road is warranted. However, as discussed in the TIS, the existing de-facto right turn lane (the dashed bike lane area approaching the intersection) is considered to be sufficient. Further, the LOS results show that with this de-facto lane, operations are sufficient at the intersection. Northbound Faraday Avenue already includes an exclusive left turn lane and a shared left-thru-right lane.

Response 6. This comment is not on an environmental topic under CEQA, and as such does not raise any significant environmental issue. The city contracted with a firm to prepare VMT analysis for this city proposed project consistent with its VMT guidelines.

Response 7. This comment indicates that VMT assumptions that Veterans Memorial Park will generate only 3.6% to 4.9% new trips, and the rest will just be redistributed trips are not correct. Please see responses to comments 9, 10, 11, and 15 in Letter C.

Response 8. See response to #4 above.

Response 9. See response to #5 above.

SECTION 2.0
ERRATA (CLARIFICATIONS AND REVISIONS)

Any corrections to the IS/MND text, tables, and figures generated either from responses to comments or independently by the City of Carlsbad, are stated in this section of the Final IS/MND. These IS/MND revisions are provided to clarify, refine, and provide supplemental information for the IS/MND. Changes may be corrections or clarifications to the text and tables of the original IS/MND. Other changes to the IS/MND clarify the analysis in the IS/MND based upon the information and concerns raised by comments during the public review period. None of the information contained in these IS/MND revisions constitutes significant new information or changes to the analysis or conclusions of the IS/MND.

The information included in these IS/MND revisions that resulted from the public comment process does not constitute substantial new information that requires recirculation of the IS/MND pursuant to Section 15088.5 of the State CEQA Guidelines.

The modifications contained in the following pages are in the same order as the information appears in the IS/MND. Deleted text is shown as ~~strikeout~~ and new text is underlined. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

INTRODUCTORY PAGES

Appendix

Appendix A – Air Quality and Greenhouse Gas Modeling Data
Appendix B – Biological Technical Report
Appendix C – Coastal California Gnatcatcher Report
Appendix D – Phase I Archaeological and Paleontological Resources Inventory
Appendix E – Geotechnical Investigation, Infiltration Testing, and Surficial Geologic Mapping
Appendix F – Phase I Environmental Site Assessment
Appendix G– Preliminary Storm Water Quality Management Plan
Appendix H – Noise Calculations
Appendix I – Vehicle Miles Traveled (VMT) Assessment Memorandum
Appendix J – Updated Multi-Modal Level of Service Analysis

SECTION 1

Project Description – Page 3

Pedestrian and Bicycle Trails: The Project proposes internal facilities for pedestrians and cyclists, including a system of ADA -compliant access paths to connect the different areas of the park. Existing sidewalks and bike lanes along Faraday Avenue would remain in place and continue to provide pedestrian and bicycle access to the site. An existing multi-use trail located within the Project site would be extended as part of the Project, which is located along the southern and eastern boundaries of the Project site. The trail would be extended along the northeast, northern, and western edges of the Project site to provide a perimeter loop trail and connectivity to existing off-site trails adjacent to the park. The Project would generally maintain the existing public trails within the Project site, which is identified as Segment 8.5 in the City's Final Trails Master Plan (Carlsbad 2019b). This would include the continued use of the trail that is located adjacent to the Poinsettia 61 (P 61) mitigation area. Improvements to the existing trail would be limited to maintenance only as well as the installation of signage and three-wire fencing along both edges of existing trails to prevent trespass by public users.

SECTION 2

Biological Resources Section – Page 28

The Cooper's hawk (*Accipiter cooperii*) (State Watch List; HMP-Covered Species), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), and loggerhead shrike may occur onsite for nesting. The loss of an active migratory bird nest would be considered a violation of the MBTA and Sections 3503, 3503.5, and 3513 of California Fish and Game Code. The MBTA and California Fish and Game Code prohibits the taking of migratory birds, nests, and eggs. The potential loss of an active nest would be considered adverse but not significant because the impact does not meet the significance criteria identified above. However, implementation of **MM BIO-4** has been included, which addresses the time frame in which construction could occur to avoid active nests and includes a requirement to flush birds away from the impact areas to prevent direct impacts to individual animals. In addition, if other construction activities cannot be avoided during the nesting season, the Project shall implement the requirements contained in **MM BIO-5** to avoid and/or reduce potential impacts, which include requirements for lighting, Project site cleanliness, and measures to keep pets and exotic species out of the Project site. Also, **MM BIO-9** has been incorporated into the Project, which requires focused surveys for white-tailed kite nests, and avoidance if found. With implementation of **MM BIO-4,** ~~and~~ **MM BIO-5**, and **MM BIO-9**, potentially significant impacts to migratory birds, nests, and eggs would be reduced to a less than significant level.

The remaining special status wildlife species that may occur onsite are roosting bats: pallid bat (*Antrozous pallidus)*, Townsend's big-eared bat (*Corynorhinus townsendii)*, western mastiff bat (*Eumops perotis californicus)*, hoary bat (*Lasiurus cinereus)*, and Yuma myotis (*Myotis yumanensis)*. During the bat maternity season, bats are known to form colonial maternity roosts where multiple pregnant females give birth to flightless pups and rear the young. Impacts to active maternity roosts are considered potentially significant under CEQA as some roosts can be considered native wildlife nursery sites. Bat species are considered non-game mammals and are afforded protection by State law from take (Fish and Game Code, § 4150). Conflicts with State law resulting from project-related impacts to native bat species are considered significant. However, **MM BIO-5(d)** has been included that addresses actions to avoid and/or reduce potential impacts to roosting bat species, including retaining a Designated Bat Biologist for the Project, conducting a survey during the bat roosting season, as well as a preconstruction bat survey ~~required survey for tree roosting bats prior to trees being removed~~. With implementation of **MM BIO-5(d),** potentially significant impacts to roosting bats would be reduced to a less than significant level.

Biological Resources Section – Page 36

The following wildlife impact avoidance measures shall be implemented during construction of the Project site.

a) Lighting in or adjacent to the preserve shall not be used, except where essential for roadway, facility use, and safety. If nighttime construction lights are necessary, all lighting adjacent to natural habitat shall be shielded and/or directed away from habitat.

b) If dead or injured listed species are located, initial notification must be made within three working days, in writing, to the USFWS and CDFW.

c) ~~Exotic species that prey on or displace target species of concern shall be permanently relocated from the site by a qualified biologist to an appropriate open space area to be coordinated with the City.~~

c) To avoid attracting predators of the target species of concern, the Project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the site. Pets of construction personnel shall not be allowed on the Project site where they may come into contact with any listed species.

d) A qualified biologist with expertise and experience conducting bat surveys shall be retained by the City as a Designated Bat Biologist. A bat survey will be conducted within the Project site to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts, especially within trees within the Project area. The survey shall occur during the roosting season (approximately March-September) using acoustic technology and emergence counts. Also, no more than 30 days prior to vegetation removal, the Designated Bat Biologist will conduct a pre-construction bat survey within all trees or structures that provide suitable bat roosting habitat within the Project site. If a maternity roost is determined to be present within a tree to be removed, a 300-foot no work buffer shall be placed around the roost and no work shall occur within the buffer until after the roosting season is over. Work may proceed after a qualified biologist is able to verify that the roost is no longer active.

Biological Resources Section – Page 38

BIO-9: For each year in which Project activities commence between February 1 and September 15, a focused survey for white-tailed kite nests within the Project site and within 500-feet of the Project site will be conducted by a qualified biologist no greater than 15 days prior to the start of construction work (including clearing and grubbing). If white-tailed kites are found, the qualified biologist shall develop a species-specific avoidance plan for CDFW review and approval. Any measures approved in the avoidance plan will be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, nothing further will be required. If active nests are found during the focused survey, Project personnel shall immediately notify CDFW and establish a minimum 500' no-work buffer zone until the qualified biologist determines, and CDFW confirms, that all chicks have fledged and are no longer reliant on the nest site. If a lapse in Project-related activities of 14 days or longer occurs, another focused survey is required before Project activities can be reinitiated.

Land Use and Planning Section – Page 73

Growth Management Program

Chapter 21.90 of the Carlsbad Municipal Code contains the City's Growth Management Program. To ensure that development does not occur unless facilities and improvements are available, the Growth Management Program requires that the City Council adopt by resolution a citywide facilities and improvements plan. The Citywide Facilities and Improvements Plan was originally adopted in 1986 and has most recently been amended in August 2017 (Carlsbad 2017b).

The Citywide Facilities and Improvements Plan includes an evaluation of the arrangement and number of future housing units in the City and establishes performance standards for public facilities (Carlsbad 2017b). Of most relevance to the Project are the performance standards relating to parks and circulation. The Project is included in the Citywide Facilities and Improvements Plan to help the City achieve an acceptable park performance standard of three acres of community park or special use area per 1,000 population. Therefore, the Project would be consistent with and not inhibit implementation of this aspect of the plan. The Citywide Facilities and Improvements Plan establishes a requirement to maintain Level of Service (LOS) D or better for all modes that are subject to this multi-modal level of service (MMLOS) standard, as identified

in Table 3-1 of the General Plan Mobility Element, excluding LOS exempt intersections and streets approved by the City Council. A Transportation Impact Study (TIS) was prepared for the Project as required by the City's Transportation Impact Analysis Guidelines (2018). Through this analysis, several features were identified to improve the design of the project and ensure project consistency with the City's transportation, pedestrian, bicycle, and transit policies. The applicant will implement these features, which are outlined in the TIS (Psomas 2021a). Incorporation of these features into the Project ensures that the Project is consistent with the City's Growth Management Plan, as outlined in the TIS. As the City's Transportation Impact Analysis Guidelines and the GMP embody the requirements of the City of Carlsbad with regards to the policies addressing the full range of circulation system requirements and improvements (including transit, roadway, bicycle, and pedestrian facilities), the Project would be consistent with these plans and policies. ~~As described in more detail below in subsection XVII of this IS/MND, with implementation of mitigation the Project is consistent with the City's MMLOS standards for pedestrian, bicycles, and transit~~. Given the considerations above, the Project would not impair implementation of the City's Growth Management Program.

SECTION 3

Page 107

Fehr & Peers. 2021 (June 28, Appendix Updated June 1, 2022). Veterans Memorial Park SB 743 Vehicle Miles Traveled (VMT) Assessment. San Diego, CA: Fehr & Peers.[1]

[1] This updated version of the VMT Assessment is provided

Appendix I

Vehicle Miles Traveled (VMT) Assessment Memorandum

Updated on June 1, 2022

with Minor Typographical Updates

FEHR PEERS

Memorandum

Date: June 28, 2021, Appendix updated June 1, 2022

To: Barbara Kennedy, Parks Planner, Parks & Recreation Dept., City of Carlsbad

From: Mahdie Hasani and Katy Cole, Fehr & Peers

Subject: Veterans Memorial Park SB 743 Vehicle Miles Traveled (VMT) Assessment

SD21-0400

This memorandum evaluates VMT for transportation impact purposes of the proposed Veterans Memorial Park project (the "project"). The VMT analysis was conducted consistent with the methodologies described in the City of Carlsbad's *VMT Analysis Guidelines*, September 2020.

The project is located southeast of the Agua Hedionda Lagoon and bordered by Faraday Avenue on the west and south, and by Whitman Way in the north, shown in **Figure 1**. The site is 91.5 acres, of which 48 acres are developable (12 acres is a sensitive habitat that will be preserved). The remainder of the site is within the Macario Canyon/Veterans Park HMP Preserve.

The design intent is a family-oriented park with a variety of multi-generational and inclusive amenities that are incorporated into active and passive recreational elements. Park facilities and trails are interwoven with open space and park elements. The park is physically separated into two distinct areas (north and south) which transition through passive uses and natural open space to a prominent memorial element at the high point of the site (upper terrace).

Features on the north side include:

- Plaza/community gathering area with shaded pavilions (150-person capacity)
- Catering support building/restroom/storage/small office /golf cart parking (1,915 SF)
- Inclusive playground (19,295 SF)
- Family and group picnic areas
- Lawn for unstructured activities
- Parking lot
- Nature-themed playground (21,539 SF)
- Passive use areas (gardens for meditation, relaxation, sensory gardens)

Access to the south side of the park is located near the trail underpass at Faraday Avenue. The primary amenities on the south side are:

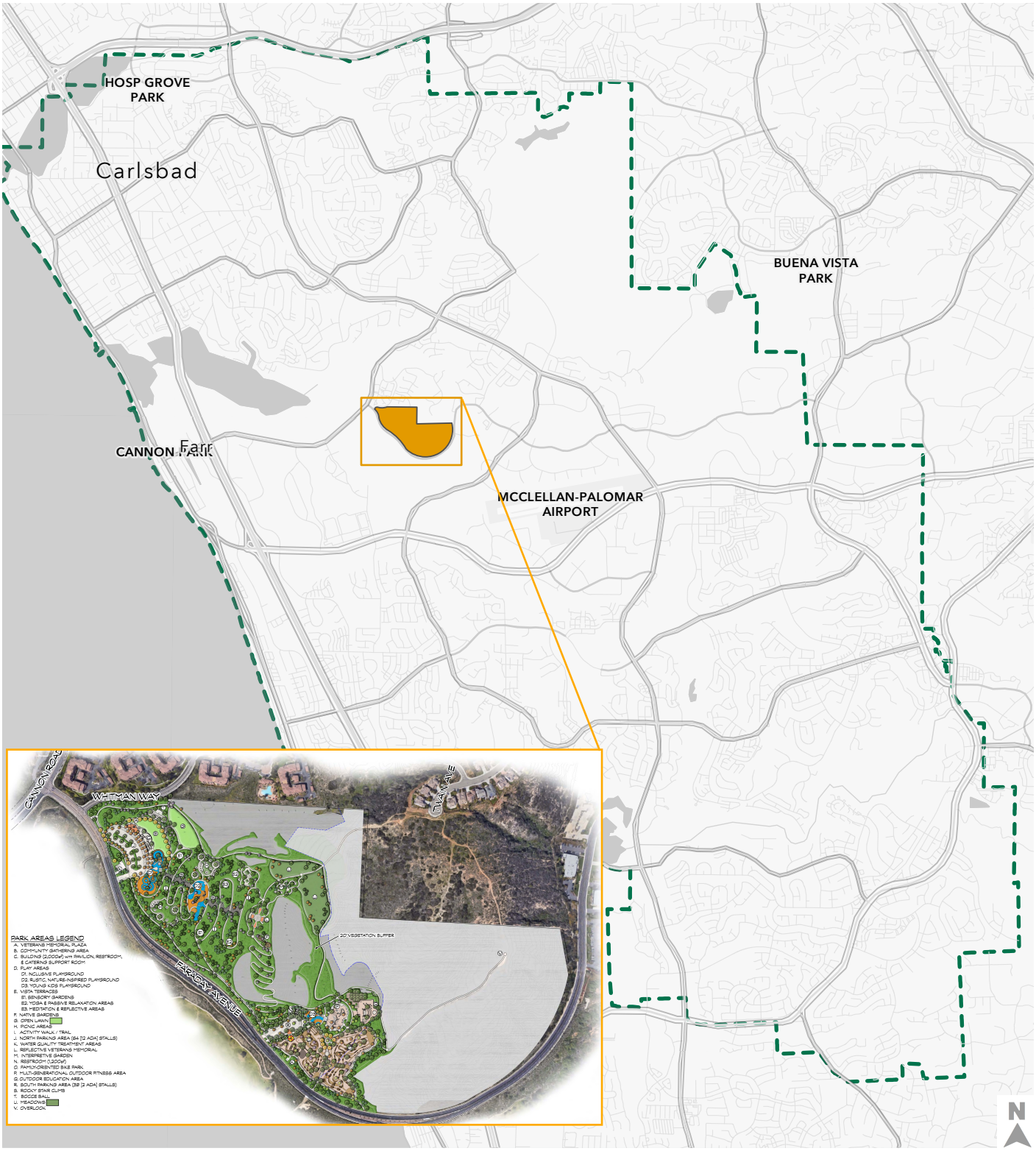
- Four-acre family-oriented bike park
- Restroom (965 SF)
- Tot lot (6,888 SF)
- Outdoor fitness area (14,579 SF)
- Outdoor education area (future development)
- Parking lot

The circulation routing (non-motorized) combines a variety of options for exploring the park:

- Accessible pathways lead from both sides of the park to the upper plateau where a prominent memorial art feature will be located. (passive use with individual seating areas to maximize views)
- Rock climb on the north slope
- Fitness run on south slope from parking lot to terrace
- Multi-use Trail - perimeter loop trail that surrounds the park is part of the citywide trail network and links with other city trails and connects to Twain Avenue.

This memorandum evaluates the effect that the proposed project would have on regional VMT to determine if the project has a significant transportation impact related to VMT. The City of Carlsbad has prepared guidelines for performing VMT analysis. As a regionally serving public facility, Veterans Memorial Park would have a significant VMT impact if the project is expected to cause a net increase in regional VMT compared to the no project condition. Also, it should be noted that most parks are considered locally serving, and would be presumed to have a less than significant impact on VMT; however, since Veteran's Memorial Park is proposed to have some unique park uses, a more detailed VMT evaluation was performed to determine its effect on regional VMT.

In general, park uses tend to redistribute existing park-related trips and do not add many new trips to the roadway network. In addition, for Veterans Memorial Park, we expect that it may reduce some vehicle trips and trip distances since the project is situated in a location that does not currently have many park facilities and some of the similar more unique facilities (such as the bike park) are currently much further away (more than 18 miles) for City residents and other North County residents. People seeking out these unique uses will have a much closer option with the implementation of Veterans Memorial Park.



Veterans Memorial Park

City of Carlsbad Boundary

Figure 1

Veterans Memorial Park Location

Step 1: Project Screening

The first step in performing transportation VMT impact analysis is to compare the project characteristics to the City of Carlsbad's screening criteria to determine if the project can be presumed to have a less than significant impact. The screening criteria are detailed in **Table 1**.

Table 1: Veterans Memorial Park VMT Screening Analysis

Screening Criteria	Analysis	Is the Project Screened?
Small Project	A small project is defined in the City of Carlsbad guidelines as generating less than 110 daily trips after applying trip-reduction strategies. *The project-generated trips are greater than 110 daily trips; therefore, the project is not considered a small project.*	No
Projects Located Near Transit	The City of Carlsbad guidelines state that projects proposed within ½ mile of the Carlsbad Village Coaster Station, the Carlsbad Poinsettia Coaster Station, or the Plaza Camino Real transit center would be presumed to have a less than significant VMT impact as long as project features do not otherwise indicate high VMT generation. *The project is farther than ½ mile from each of the listed transit stops and therefore is not located near transit.*	No
Local-Serving Retail	Local-serving retail is defined in the City of Carlsbad guidelines as retail development under 50,000 SF in size; or larger than 50,000 SF development with an approved market primarily serving local uses. *The project is not retail and therefore this screening category does not apply to Veterans Memorial Park.*	No
Local-Serving Public Facility	Local-serving public facilities are defined in the City of Carlsbad guidelines as facilities that serve the local public parks and public schools. *According to the criteria of local-serving public facilities in the City of Carlsbad VMT guidelines, the project is not considered to be local-serving per Section 3.2.4 of the City guidelines. Aspects of the project are locally serving; however, since the project will serve the entire City and offers some unique park characteristics, we have determined that it is not fully locally serving and therefore this does not apply.*	No
Affordable Housing	*The project is not a residential development and therefore this screening category does not apply to Veterans Memorial Park.*	No

Screening Criteria	Analysis	Is the Project Screened?
Redevelopment Project	The City of Carlsbad guidelines state that a redevelopment project can be screened out from preparing a VMT analysis if the proposed project's total VMT is less than the existing land use's total VMT. *The proposed project is not a redevelopment project; accordingly, the project does not meet the screening criterion.*	No

Source: Fehr & Peers, 2021.

As shown in **Table 1**, the project does not meet the City of Carlsbad's VMT screening. Therefore, a VMT analysis is necessary to determine if the project has a VMT transportation significant impact.

Step 2: VMT Analysis

Since the project does not meet the screening criteria, a VMT analysis is performed consistent with the City of Carlsbad's *VMT Analysis Guidelines*.

For regionally serving public facility land uses, an evaluation of the effect that the project has on regional VMT is required as described in Section 3.2.4 and Appendix A of the VMT Analysis Guidelines. The project was evaluated based on the net increase in total regional VMT. As described in the Guidelines: Public facilities that *do not meet the screening criteria…are considered regional…projects and require a model.* [Note that a sketch model is appropriate for this project as described below.] *Regional…projects that result in a net increase in VMT compared to the no project condition would have a significant transportation impact.*

The VMT analysis for the project was prepared using a sketch model based on detailed information regarding the park users' types, their travel characteristics, and "big data" for other similar parks in the San Diego Region. Use of the sketch model is more accurate than using a regional travel demand model because the model assumptions are project-specific, and in our experience, the SANDAG Regional Travel Demand Model is not sensitive enough to evaluate projects that generate less than 2,400 daily trips or projects that are unique in nature. This project is a community park that has unique recreational opportunities (bike park, trails, and other park uses); and therefore, a regional travel demand model would not accurately capture the nuances of the project. Multiple data sources and approaches were utilized for the analysis described in the following sections.

Data Sources

Big Data

Given the unique characteristic of the park (such as the bike park component), it is expected that some users from farther away may visit this park seeking out this amenity. We collected and analyzed data from a big data source[1] to understand visitor's travel patterns to similar parks in the region. This data helped us to understand the extent that park users travel to seek out park amenities. A summary of four existing parks that offer similar amenities to the project is described below.

[1] Streetlight Data is a transportation data vendor that provides current and past transportation metrics such as trip origins and destinations derived from aggregated smartphone Global Positioning System (GPS) and sensor data.

1. Sweetwater Bike Park

The 4.2-acre park opened on January 4, 2020, and is operated by the County of San Diego. It provides two flow trails, three pump tracks, a wooden feature skills area, rock gardens, and three progressive jump lines. It is the first bike park in the county.

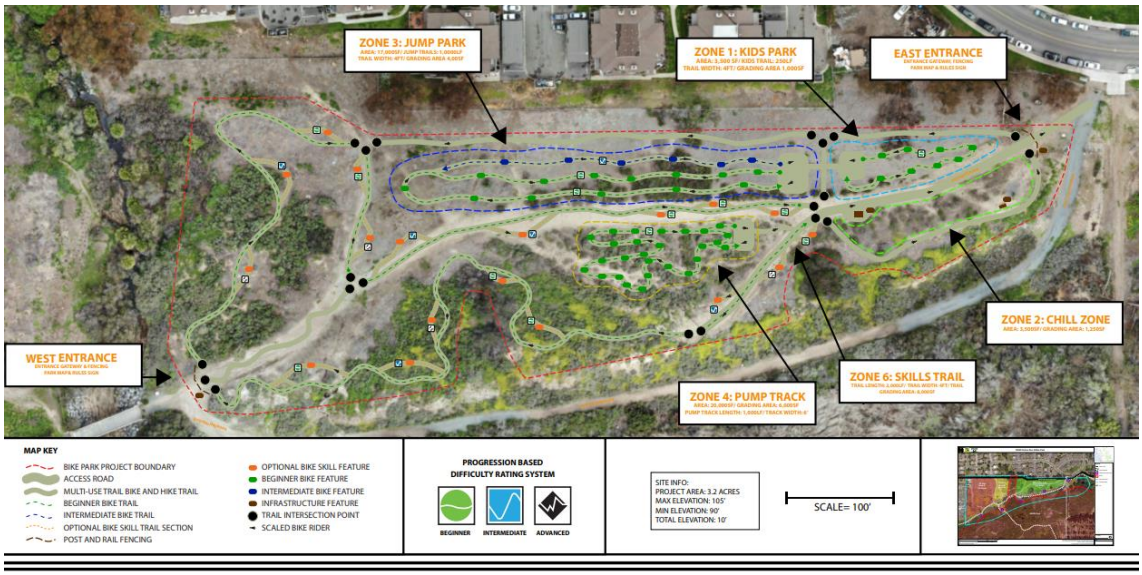
Figure 2: Sweetwater Bike Park Plan

Source: sandiegouniontribune.com

2. Greg Cox Bike Park

This 3.2- acre park opened on April 28, 2021 and is managed by the City of Chula Vista. It provides a kid track, a modular pump track, two jump lines with wooden features leading into a wallride and one return trail, and a perimeter trail with small drops and rock gardens. It is the second bike park in the county.

Figure 3: Greg Cox Bike Park Plan



Source: sdparks.org

3. Pacific Highlands Ranch Community Park

This park opened in April 2019 and is managed by the City of San Diego. The park offers a variety of facilities including a playground, skate plaza, parkour area, fitness stations, picnic areas, a bike park, etc. The bike park is a 0.5-acre concrete surfaced facility with two progressive pump tracks that are open to bikes and skateboards.

This park is the closest bike park to the proposed project, and also offers a similar type of family-oriented facilities to visitors.

Figure 4: Pacific Highlands Ranch Community Park Plan

Source: Parksinsandiego.com

4. Encinitas Community Park

This 44- acre park opened in January 2015 and is managed by the City of Encinitas. It is a family-oriented park that provides a skate park, a dog park, a kid's play area, picnic facilities, softball/baseball fields, and soccer/multi-purpose fields.

It is the closest larger scale family-oriented city park to the project with a similar type of amenities. Also, in terms of developed areas, this park is similar in size to the project. Therefore, this park was included to provide some insights on multi-use parks similar in size/character to the project.

Travel distance of park users to these four parks on weekdays and weekends are summarized in **Tables 2** and **3**, respectively. The analysis year was selected based on the park's opening year and

the availability of big data These tables show the percentage of park users that travel one-way for each travel distance range. As shown in these tables, the majority of park users travel less than 10 miles to a park.

Also, **Tables 2** and **3** demonstrate the that travel distance for park users on weekdays and weekends are similar, with the weekends having more park users that are slightly farther away. For example, on the weekdays, 81% of park users are within 10 miles of the park. On weekends, 70% of park users are within 10 miles of the park.

Table 2: One-Way Trip Length of Park Visitors on Weekdays (Miles)

Parks	Year	Less than 1	1 to 3	3 to 5	5 to 10	10 to 25	25 to 50	50 to 100	more than 100
Pacific Highlands Ranch	2019	22%	31%	17%	14%	10%	1%	2%	4%
Pacific Highlands Ranch	2020	18%	25%	14%	19%	17%	2%	2%	3%
Encinitas Community Park	2019	22%	30%	14%	14%	13%	2%	2%	4%
Encinitas Community Park	2020	24%	25%	15%	14%	13%	3%	2%	4%
Sweetwater Regional Park and Bike Park[1]	2020	7%	29%	30%	17%	11%	2%	1%	2%
Greg Cox Bike Park[2]	2019	17%	26%	17%	13%	17%	4%	0%	4%
Greg Cox Bike Park[2]	2020	14%	33%	14%	14%	19%	5%	0%	5%
Average[2]		***19%***	***28%***	***18%***	***16%***	***13%***	***2%***	***2%***	***3%***

Source: StreetLight Data, 2021. Fehr & Peers, 2021.
Note:
[1] Sweetwater Bike Park opened in 2020. So, only 2020 data were summarized. Note that the park opened during the COVID-19 pandemic when open parks were experiencing a higher number of daily visitations than usual[2]. Also, Sweetwater Bike Park data includes trips to Sweetwater Valley Little League.
[2] Greg Cox Bike Park opened in April 2021. Big data after the park opening is not available; however, 2019 and 2020 data were available for trail use in the park area prior to opening of the bike park. Since the data does not represent an official park, the data was not included in the analysis.

[2] Public parks and the pandemic: How park usage has been affected by COVID-19 policies: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0251799

Table 3: One-Way Trip Length of Park Visitors on Weekends (Miles)

Parks	Year	Less than 1	1 to 3	3 to 5	5 to 10	10 to 25	25 to 50	50 to 100	more than 100
Pacific Highlands Ranch	2019	16%	19%	16%	21%	18%	3%	4%	5%
Pacific Highlands Ranch	2020	14%	23%	11%	18%	21%	4%	5%	5%
Encinitas Community Park	2019	16%	24%	14%	16%	18%	6%	3%	4%
Encinitas Community Park	2020	20%	20%	14%	15%	17%	5%	4%	4%
Sweetwater Regional Park and Bike Park[1]	2020	6%	26%	24%	22%	12%	4%	3%	4%
Greg Cox Bike Park[2]	2019	17%	26%	17%	13%	17%	4%	0%	4%
Greg Cox Bike Park[2]	2020	14%	33%	14%	14%	19%	5%	0%	5%
Average[2]		***14%***	***22%***	***16%***	***18%***	***17%***	***4%***	***4%***	***4%***

Source: StreetLight Data, 2021. Fehr & Peers, 2021.
Note:
[1] Sweetwater Bike Park opened in 2020. So, only 2020 data were summarized. Note that the park opened during the COVID-19 pandemic when open parks were experiencing a higher number of daily visitations than usual. Also, Sweetwater Bike Park data includes trips to Sweetwater Valley Little League.
[2] Greg Cox Bike Park opened in April 2021. Big data after the park opening is not available; however, 2019 and 2020 data were available for trail use in the park area prior to opening of the bike park. Since the data does not represent an official park, the data was not included in the analysis.

The overall travel distance of park visitors to these parks was summarized in **Table 4**. Based on the data, the average 85th percentile weekday one-way travel distance is approximately 16 miles and weekend one-way travel distance is 23 miles. And the average weekday one-way travel distance is approximately 8 miles and weekend one-way travel distance is 12 miles.

Table 4: Summary of Park User's One-Way Trip Length to Three Parks

Day of Week	One-Way Trip Length (Miles)			
	85th Percentile		Weighted Average	
	Three Parks[1]	Parks with Bike Park Facility[2]	Three Parks[1]	Parks with Bike Park Facility[2]
Weekday	16	15	8	9
Weekend	23	22	12	12

Source: StreetLight Data, 2021. Fehr & Peers, 2021.
Note:
[1] Three parks are Sweetwater Bike park, Pacific Highlands Ranch Community Park, and Encinitas Community Park. Greg Cox Bike Park data was not included in the analysis.
[2] Parks with bike park facilities are Sweetwater Bike Park and Pacific Highlands Ranch Community Park. Note that Sweetwater Bike Park data also includes trips to Sweetwater Valley Little League.

Park Users

To explain the effect of the project on the regional VMT, we classified the project's users into three categories including general park users, bike park users, and curious users described as follows and in **Table 5:**

General Park Users will mostly be people who live in the City of Carlsbad. These users are usually seeking a nearby or convenient park with typical amenities and would have sought out a park regardless of the project being constructed. Users may walk, bike, or drive to the closest park to use playgrounds, trails, or picnic areas.

Bike Park Users are the users who are specifically seeking out bike park with facilities such as pump tracks, jump lines, or flow trails. Such users may choose to drive long distances to reach a bike park.

Curious Users are the group of people who are interested in visiting new parks. We expect that these users may travel a bit farther than a general park user seeking out new park amenities.

Table 5: Veterans Memorial Park Users

	General Park Users	Bike Park Users	Curious Park Users
Visitors	Primarily City of Carlsbad residents	Both residents and non-residents of the City of Carlsbad	Both residents and non-residents of the City of Carlsbad
Typical Park Selection	Closest park	Closest bike park	Newly constructed parks with unique amenities
Motivation for Visiting a Park	Seeking typical park amenities (e.g. picnic area, playground, trails, etc.)	Seeing bike park amenities (Pump tracks, flow trails, etc.)	Seeking something new and different in a park experience.

Source: Fehr & Peers, 2021.

In the following sections, we reviewed the travel purpose, behavior, and VMT effect of each type of user and use the big data to help understand that VMT characteristics for each type of user.

General Park Users

The proposed park provides a closer park option for many of the general park users in the City of Carlsbad. Such users will likely drive shorter distances and generate less VMT compared to no project conditions.

The average travel distance of park users is 12 miles (**Table 4**). So, the majority of the park users' home locations are within the 12-mile buffer of the project site. The highlighted buffer area shown in **Figure 5** includes some park uses; however, in the immediate vicinity of the proposed project, there are not any park uses. Also, based on inspection of the map, the project would be the closest large park to many City and some north county residents.

General park users are not expected to generate new trips, but they will redistribute the trips from traveling to existing parks to the new Veterans Memorial Park assuming the proposed park is the closest location to their home. Therefore, for this group of users, the project meets the characteristics of a locally serving park and is expected to result in a reduction in VMT amongst general park users.

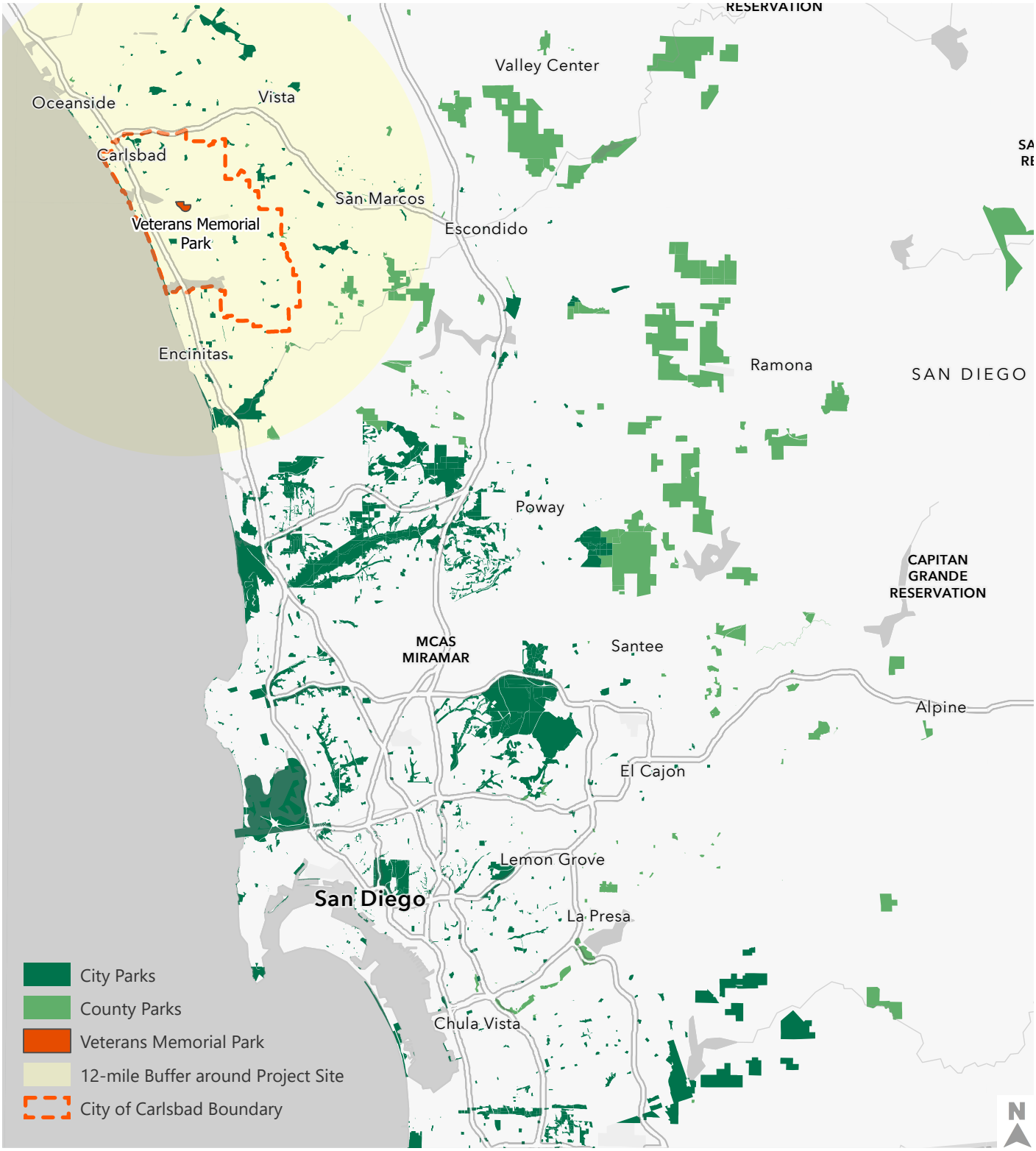


Figure 5

Location of the Existing Parks in the Vicinity of the Project

Bike Park Users

Bike park users include City of Carlsbad residents and non-residents. Since there are limited existing bike park amenities in the region, Carlsbad residents that are specifically seeking bike park amenities would need to travel long distances.

City of Carlsbad Resident Bike Park Users

Geospatial analysis was performed to determine the driving distance from the centroid of each census tract within the City of Carlsbad to the three similar bike parks described in the previous section and the comparative distance to the proposed project location (see **Appendix**). These distances were used to estimate the difference in VMT generated by Carlsbad residents making a round-trip to the bike park.

Table 6 shows the average distance of Carlsbad residents traveling to the existing sample bike parks as compared to their distance to the project. As shown, the distance to the project is substantially less than to other available bike parks in the region.

Table 6: Average Travel Distance of the City of Carlsbad Residents to Bike Parks

Parks	Weighted Average Distance per Residents Round-trip[1]
Sweetwater Bike Park	82.62 miles
Greg Cox Bike Park	86.70 miles
Pacific Highlands Ranch Park	35.85 miles
Veterans Memorial Bike Park	11.67 miles

Source: Fehr & Peers, 2021.
Notes:
[1] Weighted average was calculated based on the population of the City of Carlsbad census tracts.

Non-Resident Bike Park Users

Bike park users of the project are expected to also include non-residents from nearby cities. According to big data, there is no significant difference between the average travel distance of bike park users and other park users. Generally, the average travel distance of park users is approximately 12 miles (or 24 miles round-trip). Based on Tables 2 and 3 that summarize the big data, Non-residents within the 12-mile buffer of the project are shown in **Figure 6**.

A geospatial analysis was performed to calculate the average travel distance of the non-residents within 12-miles of Veterans Memorial Park to the existing three bike parks as well as the Veterans Memorial park (see **Appendix**). **Table 7** shows the average round-trip travel distance for non-residents.

Similar to residents, the round-trip travel distance of the non-residents to the project will be substantially less than no project condition.

Table 7: Average Travel Distance of the Non-Residents to Bike Parks

Parks	Weighted Average Distance per Non-Residents Round-trip[1]
Sweetwater Bike Park	92.68 miles
Greg Cox Bike Park	93.58 miles
Pacific Highlands Ranch Park	45.36 miles
Veterans Memorial Bike Park	19.25 miles

Source: Fehr & Peers, 2021.
Notes:
[1] Weighted average was calculated based on the population of the census tracts.

Based on this analysis of travel distance, the bike park users would not increase regional VMT, and to the extent that people are seeking out bike park uses, are expected reduce regional VMT.

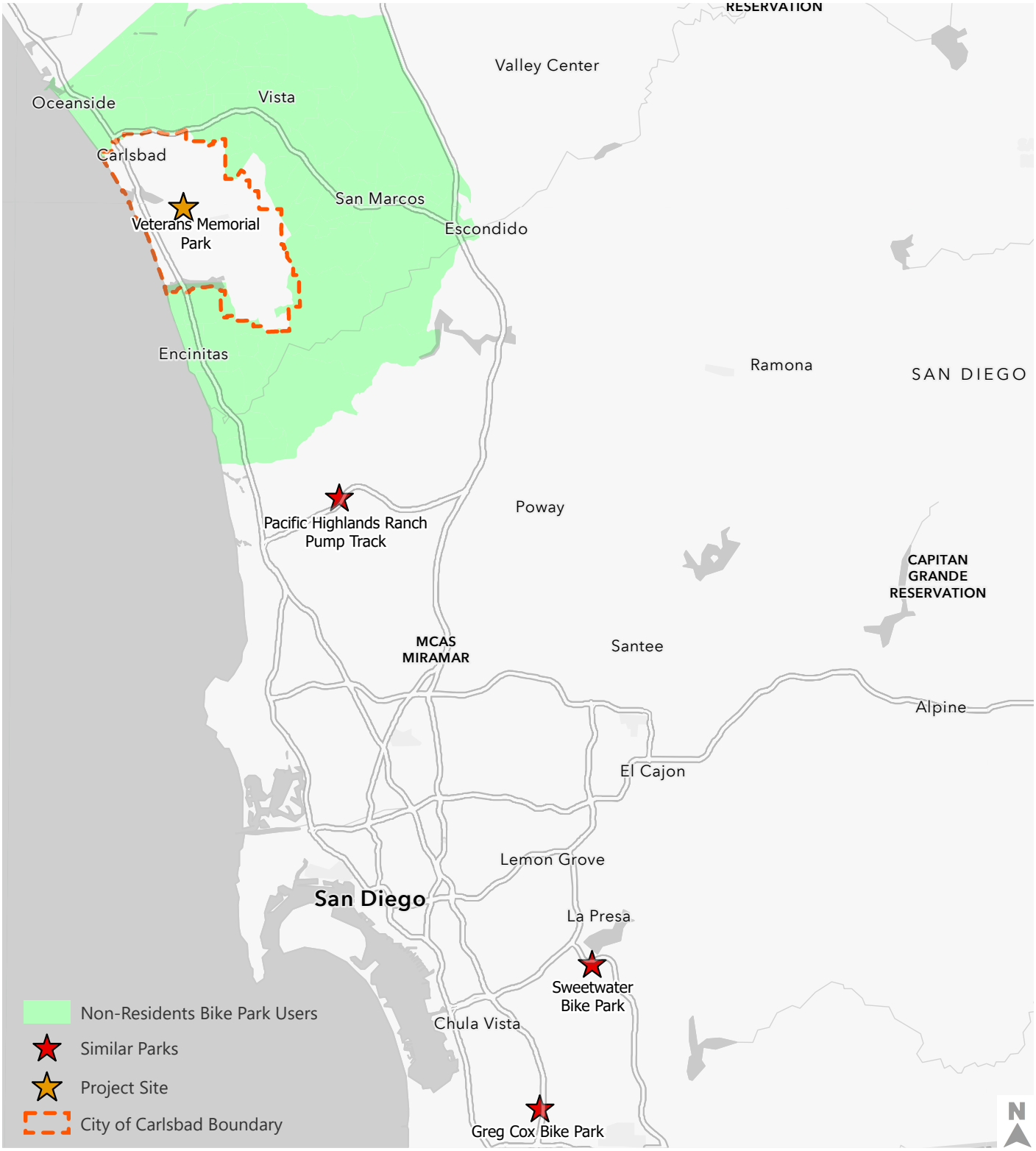


Figure 6

Non-Resident Bike Park Users

Curious Park Users

We expect curious users to make up the smallest proportion of overall park uses. Even though curious users will represent a small portion of park use, their trips may slightly increase regional VMT, since they are willing to drive a bit further to seek out a new, cool park, especially during the first couple years of the park opening and they may represent new trips/VMT within the region. However, based on the big data, this phenomenon does not seem to be extensive given that the brand-new Sweetwater bike park use had similar user travel distance to more established parks such as the Encinitas Community Park. However, to represent a worst-case scenario, we are considering the curious park users in our user profile.

In some cases, curious residents and non-residents visiting Veterans Memorial park may have longer trip lengths depending on their home locations, while in some other cases the trip length may be shorter. In addition, curious park users may be a combination of people who are redirecting to a different park or people who are a brand-new trip. Using the 12-miles buffer, as a proxy for where people live in relation to the project site, we performed a GIS analysis to calculate the population within this buffer around the project site as well as three existing bike parks in the county.

Based on the analysis, it is observed that it is relatively densely populated around the project within the 12-mile buffer, as summarized in **Table 8**, therefore, our expectation is that most curious users, like other park users, would primarily originate within that buffer. Therefore, the curious users that are redirecting from a different park would not increase regional VMT. Curious users that are brand new park trips may slightly increase regional VMT; however, given that this sub-group is expected to be small, the increase in VMT would be more than offset by the reduction in VMT due to general park users and bike park users.

Table 8: Population within 12-mile Buffer Around Bike Parks

Parks	Population within 12-mile buffer (in thousands)
Greg Cox Bike Park	330
Pacific Highlands Ranch Community Park	550
Veterans Memorial Park	***610***
Sweetwater Bike Park	1,050

Source: Fehr & Peers, 2021.

Overall Change in Regional VMT

This section provides calculations of change in VMT associated with each park user group. Since it is unknown how many users will be in each user category, we have provided the calculations based on a range of different assumptions for user breakdown. This is intended to provide a range of the change in VMT and show the expected VMT trend (reduction or increase in regional VMT). **Table 9** displays the relative change for each user group based on the data presented in the previous sections.

Table 9: Relative Change in VMT for Each User Group

Park Users		Effect on VMT
General Park Users	Residents	Reduction
Bike Park Users	Residents	Reduction
	Non-residents	Reduction
Curious Park Users	Residents/redistributed trip	Reduction
	Residents/new trip	Increase
	Non-residents/redistributed trip	Reduction
	Non-resident/new trip	Increase

Source: Fehr & Peers, 2021.

Based on the approved scoping agreement, the project is estimated to generate 893 (447 inbound and 446 outbound) daily weekday vehicle trips and 1,099 (550 inbound/449 outbound) weekend daily vehicle trips. To provide a range in expected VMT, we estimate the total vehicle trips of each user type and their trip length before and after the project condition to calculate the overall change in VMT. We used engineering judgment and information from the big data sources to arrive at the following assumptions for two scenarios. Scenario 1 includes more conservative assumptions than scenario 2, as explained in **Table 10**. Therefore, we expect the VMT change to be somewhere in between these two scenarios.

Table 10: Scenario Assumptions – Trip Percentages and Round-Trip Travel Distance

Park Users		Trip Percentage (Scenario 1)[1]	Trip Percentage (Scenario 2)[1]	Average Trip Length (miles) - w/o Project	Average Trip Length (miles) - with Project
General Park Users[2]	Residents/Non-residents	80% (70%)	50% (45%)	16.0	11.67
Bike Park Users[3]	Residents	10% (10%)	15% (15%)	35.85	11.67
	Non-residents	4% (10%)	25% (30%)	45.36	19.25
Curious Park User[4]	New trips	3% (5%)	5% (5%)	0	24.0
	Redistributed trips	3% (5%)	5% (5%)	24.0	24.0

Source: Fehr & Peers, 2021.
Notes:
[1] Based on our engineering judgement.
[2] Without Veterans Memorial Park, the round-trip travel distance of general park users was assumed 16 miles (the average trip length of park users on weekdays based on big data). After the project is implemented, general park users travel distances were assumed to be similar to residents bike park travel distances.
[3] Bike park users are 50% residents and 50% non-residents. Without Veterans Memorial Park, all bike park users were assumed to go to the closest bike park (Pacific Highlands Ranch).
[4] Curious users are 50% new trips and 50% redistributed trips. Their round-trip travel distances before and after the project were assumed 24 miles (average trip length based on big data).

The regional change in total VMT attributed to the Veterans Memorial Park project is expected to be somewhere between scenario 1 and scenario 2, as summarized in **Tables 11 through 14**. The project is expected to generate about 3,108 to 5,514 fewer vehicle miles on weekdays and about 4,433 to 7,389 fewer vehicle miles on weekends as compared to before the project was built.

Table 11: Change in VMT on Weekdays – Scenario 1

Park Users		Without Project			With Project			Difference
		#Trips	Trip Length (Round-trip)	VMT	#Trips	Trip Length (Round-trip)	VMT	
General Park Users	Residents	358	16.00	5,728	358	11.67	4,178	-1,550
Bike Park Users	Residents	45	35.85	1,613	45	11.67	525	-1,088
	Non-residents	18	45.36	816	18	19.25	347	-470
Curious Park Users	New Trips	-	-	-	13	24.00	312	312
	Redistributed	26	24.00	624	13	24.00	312	-312
Total		***447***	***-***	***8,782***	***447***	***-***	***5,674***	***-3,108***

Source: Fehr & Peers, 2021.

Table 12: Change in VMT on Weekends – Scenario 1

Park Users		Without Project			With Project			Difference #Trips
		#Trips	Trip Length (Round-trip)	VMT	#Trips	Trip Length (Round-trip)	VMT	
General Park Users	Residents	385	16.00	6,160	385	11.67	4,493	-1,667
Bike Park Users	Residents	55	35.85	1,972	55	11.67	642	-1,330
	Non-residents	55	45.36	2,495	55	19.25	1,059	-1,436
Curious Park Users	New Trips	-	-	-	28	24.00	672	672
	Redistributed	55	24.00	1,320	27	24.00	648	-672
Total		***550***		***11,947***	***550***		***7,514***	***-4,433***

Source: Fehr & Peers, 2021.

Table 13: Change in VMT on Weekdays – Scenario 2

Park Users		Without Project			With Project			Difference #Trips
		#Trips	Trip Length (Round-trip)	VMT	#Trips	Trip Length (Round-trip)	VMT	
General Park Users	Residents	224	16.00	3,584	224	11.67	2,614	-970
Bike Park Users	Residents	67	35.85	2,402	67	11.67	782	-1,620
	Non-residents	112	45.36	5,080	112	19.25	2,156	-2,924
Curious Park Users	New Trips	-	-	-	22	24.00	528	528
	Redistributed	44	24.00	1,056	22	24.00	528	-528
Total		***447***		***12,122***	***447***		***6,608***	***-5,514***

Source: Fehr & Peers, 2021.

Table 14: Change in VMT on Weekends – Scenario 2

Park Users		Without Project			With Project			Difference #Trips
		#Trips	Trip Length (Round-trip)	VMT	#Trips	Trip Length (Round-trip)	VMT	
General Park Users	Residents	248	16.00	3,968	248	11.67	2,894	-1,074
Bike Park Users	Residents	83	35.85	2,976	83	11.67	969	-2,007
	Non-residents	165	45.36	7,484	165	19.25	3,176	-4,308
Curious Park Users	New Trips	-	-	-	27	24.00	648	648
	Redistributed	54	24.00	1,296	27	24.00	648	-648
Total		***550***		***15,724***	***550***		***8,335***	***-7,389***

Source: Fehr & Peers, 2021.

Step 3: Compare to the Significance Threshold

As a regional public facility project, the City of Carlsbad's *VMT Analysis Guidelines* (September 2020) state that the proposed project would be considered to have a significant transportation impact if it results in a net increase in VMT compared to the no project condition. Analysis proved that the project is not expected to increase regional VMT, because it provides park amenities to the local community, that forms the majority of park users; and reduces the travel distances of general park users and bike park users. Therefore, evidence suggests the project has a less-than-significant transportation VMT impact.

Appendix: Bike Park Users Travel Distances to Bike Parks with and without the Project

Table 1: Resident Bike Park User Round-Trip Travel Distance – Without Project

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
17109	Sweetwater Bike Park	6790	37.27
17801	Sweetwater Bike Park	6776	87.14
17808	Sweetwater Bike Park	6135	78.97
17809	Sweetwater Bike Park	2483	85.39
17810	Sweetwater Bike Park	5069	86.55
17811	Sweetwater Bike Park	6815	79.51
17813	Sweetwater Bike Park	4601	78.72
17900	Sweetwater Bike Park	7411	85.53
18000	Sweetwater Bike Park	3976	85.21
19803	Sweetwater Bike Park	4782	91.84
19804	Sweetwater Bike Park	4579	88.05
19806	Sweetwater Bike Park	12080	91.78
20013	Sweetwater Bike Park	13713	80.35
20014	Sweetwater Bike Park	7636	80.62
20015	Sweetwater Bike Park	4792	77.04
20016	Sweetwater Bike Park	9460	74.12
22100	Sweetwater Bike Park	9670	82.71
17109	Greg Cox Bike Park	6790	78.62
17801	Greg Cox Bike Park	6776	91.23
17808	Greg Cox Bike Park	6135	83.05
17809	Greg Cox Bike Park	2483	89.47
17810	Greg Cox Bike Park	5069	90.63
17811	Greg Cox Bike Park	6815	83.59
17813	Greg Cox Bike Park	4601	82.81
17900	Greg Cox Bike Park	7411	89.62
18000	Greg Cox Bike Park	3976	89.30
19803	Greg Cox Bike Park	4782	95.93
19804	Greg Cox Bike Park	4579	92.13
19806	Greg Cox Bike Park	12080	95.86
20013	Greg Cox Bike Park	13713	84.43
20014	Greg Cox Bike Park	7636	84.70
20015	Greg Cox Bike Park	4792	81.13
20016	Greg Cox Bike Park	9460	78.21
22100	Greg Cox Bike Park	9670	86.79
17109	Pacific Highlands Ranch	6790	25.21
17801	Pacific Highlands Ranch	6776	41.58
17808	Pacific Highlands Ranch	6135	32.33
17809	Pacific Highlands Ranch	2483	39.83
17810	Pacific Highlands Ranch	5069	40.99
17811	Pacific Highlands Ranch	6815	33.95
17813	Pacific Highlands Ranch	4601	33.17
17900	Pacific Highlands Ranch	7411	39.97
18000	Pacific Highlands Ranch	3976	39.65
19803	Pacific Highlands Ranch	4782	45.55
19804	Pacific Highlands Ranch	4579	42.40

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
19806	Pacific Highlands Ranch	12080	43.69
20013	Pacific Highlands Ranch	13713	33.71
20014	Pacific Highlands Ranch	7636	33.98
20015	Pacific Highlands Ranch	4792	27.72
20016	Pacific Highlands Ranch	9460	26.15
22100	Pacific Highlands Ranch	9670	36.07
Overall Weighted Average			
		Sweetwater Bike Park	***80.45***
		Greg Cox Bike Park	***86.70***
		Pacific Highlands Ranch	***35.85***

Table 2: Resident Bike Park User Round-Trip Travel Distance – With Project

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
17109	Veterans Memorial Park	6790	18.41
17801	Veterans Memorial Park	6776	10.03
17808	Veterans Memorial Park	6135	11.56
17809	Veterans Memorial Park	2483	8.22
17810	Veterans Memorial Park	5069	7.30
17811	Veterans Memorial Park	6815	7.52
17813	Veterans Memorial Park	4601	9.17
17900	Veterans Memorial Park	7411	10.42
18000	Veterans Memorial Park	3976	10.47
19803	Veterans Memorial Park	4782	11.12
19804	Veterans Memorial Park	4579	7.97
19806	Veterans Memorial Park	12080	17.04
20013	Veterans Memorial Park	13713	9.21
20014	Veterans Memorial Park	7636	13.80
20015	Veterans Memorial Park	4792	16.76
20016	Veterans Memorial Park	9460	15.50
22100	Veterans Memorial Park	9670	7.74
		Weighted Average	***11.67***

Table 3: Non-Resident Bike Park User Round-Trip Travel Distance – Without Project

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
17104	Pacific Highlands Ranch	3937	24.08
17106	Pacific Highlands Ranch	5227	18.71
17107	Pacific Highlands Ranch	2860	26.08
17108	Pacific Highlands Ranch	4646	24.95
17110	Pacific Highlands Ranch	11866	27.64
17303	Pacific Highlands Ranch	3073	16.76
17304	Pacific Highlands Ranch	5884	14.35
17305	Pacific Highlands Ranch	3104	16.83
17401	Pacific Highlands Ranch	5888	19.82
17403	Pacific Highlands Ranch	4997	21.72
17404	Pacific Highlands Ranch	6586	20.61
17501	Pacific Highlands Ranch	2970	22.76
17502	Pacific Highlands Ranch	3447	21.84
17601	Pacific Highlands Ranch	5131	27.83
17603	Pacific Highlands Ranch	2597	24.99
17604	Pacific Highlands Ranch	7450	25.22
17701	Pacific Highlands Ranch	5740	27.77
17702	Pacific Highlands Ranch	3032	24.76
18100	Pacific Highlands Ranch	6432	43.08
18200	Pacific Highlands Ranch	7374	45.24
18300	Pacific Highlands Ranch	2989	47.28
18400	Pacific Highlands Ranch	4089	46.79
18504	Pacific Highlands Ranch	7020	45.48
18507	Pacific Highlands Ranch	9076	54.93
18509	Pacific Highlands Ranch	5001	47.45
18510	Pacific Highlands Ranch	2801	49.61
18511	Pacific Highlands Ranch	5225	48.25
18512	Pacific Highlands Ranch	4446	51.33
18513	Pacific Highlands Ranch	9817	52.34
18514	Pacific Highlands Ranch	8254	56.22
18515	Pacific Highlands Ranch	5105	47.71
18516	Pacific Highlands Ranch	3978	52.11
18517	Pacific Highlands Ranch	4855	48.66
18518	Pacific Highlands Ranch	2941	50.45
18519	Pacific Highlands Ranch	5263	51.76
18601	Pacific Highlands Ranch	4668	51.44
18603	Pacific Highlands Ranch	6865	50.64
18608	Pacific Highlands Ranch	3224	55.83
18609	Pacific Highlands Ranch	5918	56.16
18610	Pacific Highlands Ranch	6851	58.57
18612	Pacific Highlands Ranch	3537	61.06
18613	Pacific Highlands Ranch	3773	53.93
18614	Pacific Highlands Ranch	6988	52.23
19203	Pacific Highlands Ranch	2836	60.62
19205	Pacific Highlands Ranch	6281	57.78
19206	Pacific Highlands Ranch	5236	56.79
19207	Pacific Highlands Ranch	8858	59.54
19208	Pacific Highlands Ranch	3291	57.32
19301	Pacific Highlands Ranch	6805	57.13
19302	Pacific Highlands Ranch	7965	55.35
19303	Pacific Highlands Ranch	7669	60.43
19403	Pacific Highlands Ranch	6280	54.90
19404	Pacific Highlands Ranch	3411	57.09
19405	Pacific Highlands Ranch	3969	52.57
19406	Pacific Highlands Ranch	4847	54.18

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
19501	Pacific Highlands Ranch	3843	55.83
19502	Pacific Highlands Ranch	5702	55.64
19503	Pacific Highlands Ranch	5087	52.63
19601	Pacific Highlands Ranch	6514	56.08
19602	Pacific Highlands Ranch	5452	53.04
19701	Pacific Highlands Ranch	6945	52.52
19702	Pacific Highlands Ranch	5128	51.21
19805	Pacific Highlands Ranch	4523	47.31
19808	Pacific Highlands Ranch	5759	49.03
19809	Pacific Highlands Ranch	4328	50.43
19902	Pacific Highlands Ranch	4160	48.76
19903	Pacific Highlands Ranch	4292	51.32
19904	Pacific Highlands Ranch	7763	48.24
19905	Pacific Highlands Ranch	5123	47.50
20017	Pacific Highlands Ranch	3635	46.54
20018	Pacific Highlands Ranch	7664	45.05
20019	Pacific Highlands Ranch	7071	42.46
20020	Pacific Highlands Ranch	7480	49.48
20021	Pacific Highlands Ranch	6284	49.45
20022	Pacific Highlands Ranch	7587	48.44
20023	Pacific Highlands Ranch	3840	45.68
20024	Pacific Highlands Ranch	4095	44.44
20025	Pacific Highlands Ranch	5208	43.35
20026	Pacific Highlands Ranch	4482	44.63
20027	Pacific Highlands Ranch	17006	43.41
20028	Pacific Highlands Ranch	4022	47.47
20029	Pacific Highlands Ranch	7440	45.24
20304	Pacific Highlands Ranch	6451	50.75
20305	Pacific Highlands Ranch	6246	43.33
20306	Pacific Highlands Ranch	10952	48.60
20307	Pacific Highlands Ranch	7558	40.88
20309	Pacific Highlands Ranch	4178	41.78
17306	Pacific Highlands Ranch	3078	15.74
17104	Greg Cox Bike Park	3937	74.71
17106	Greg Cox Bike Park	5227	72.45
17107	Greg Cox Bike Park	2860	75.74
17108	Greg Cox Bike Park	4646	74.60
17110	Greg Cox Bike Park	11866	81.39
17303	Greg Cox Bike Park	3073	66.42
17304	Greg Cox Bike Park	5884	64.00
17305	Greg Cox Bike Park	3104	66.60
17401	Greg Cox Bike Park	5888	69.48
17403	Greg Cox Bike Park	4997	71.37
17404	Greg Cox Bike Park	6586	70.27
17501	Greg Cox Bike Park	2970	72.41
17502	Greg Cox Bike Park	3447	71.49
17601	Greg Cox Bike Park	5131	77.48
17603	Greg Cox Bike Park	2597	74.64
17604	Greg Cox Bike Park	7450	74.88
17701	Greg Cox Bike Park	5740	77.42
17702	Greg Cox Bike Park	3032	74.41
18100	Greg Cox Bike Park	6432	92.74
18200	Greg Cox Bike Park	7374	94.90
18300	Greg Cox Bike Park	2989	96.94
18400	Greg Cox Bike Park	4089	96.45
18504	Greg Cox Bike Park	7020	95.13
18507	Greg Cox Bike Park	9076	104.58

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
18509	Greg Cox Bike Park	5001	97.11
18510	Greg Cox Bike Park	2801	99.26
18511	Greg Cox Bike Park	5225	97.90
18512	Greg Cox Bike Park	4446	100.99
18513	Greg Cox Bike Park	9817	101.99
18514	Greg Cox Bike Park	8254	105.87
18515	Greg Cox Bike Park	5105	97.36
18516	Greg Cox Bike Park	3978	101.76
18517	Greg Cox Bike Park	4855	98.31
18518	Greg Cox Bike Park	2941	100.10
18519	Greg Cox Bike Park	5263	101.41
18601	Greg Cox Bike Park	4668	101.09
18603	Greg Cox Bike Park	6865	100.29
18608	Greg Cox Bike Park	3224	105.48
18609	Greg Cox Bike Park	5918	105.81
18610	Greg Cox Bike Park	6851	108.22
18612	Greg Cox Bike Park	3537	110.71
18613	Greg Cox Bike Park	3773	103.58
18614	Greg Cox Bike Park	6988	101.89
19203	Greg Cox Bike Park	2836	108.52
19205	Greg Cox Bike Park	6281	105.68
19206	Greg Cox Bike Park	5236	104.69
19207	Greg Cox Bike Park	8858	107.44
19208	Greg Cox Bike Park	3291	98.67
19301	Greg Cox Bike Park	6805	106.78
19302	Greg Cox Bike Park	7965	105.00
19303	Greg Cox Bike Park	7669	108.33
19403	Greg Cox Bike Park	6280	104.56
19404	Greg Cox Bike Park	3411	104.99
19405	Greg Cox Bike Park	3969	102.22
19406	Greg Cox Bike Park	4847	103.84
19501	Greg Cox Bike Park	3843	103.74
19502	Greg Cox Bike Park	5702	103.55
19503	Greg Cox Bike Park	5087	102.28
19601	Greg Cox Bike Park	6514	103.99
19602	Greg Cox Bike Park	5452	100.95
19701	Greg Cox Bike Park	6945	102.17
19702	Greg Cox Bike Park	5128	100.28
19805	Greg Cox Bike Park	4523	96.96
19808	Greg Cox Bike Park	5759	98.68
19809	Greg Cox Bike Park	4328	100.08
19902	Greg Cox Bike Park	4160	96.66
19903	Greg Cox Bike Park	4292	99.23
19904	Greg Cox Bike Park	7763	97.90
19905	Greg Cox Bike Park	5123	97.16
20017	Greg Cox Bike Park	3635	96.19
20018	Greg Cox Bike Park	7664	93.35
20019	Greg Cox Bike Park	7071	92.12
20020	Greg Cox Bike Park	7480	92.80
20021	Greg Cox Bike Park	6284	90.80
20022	Greg Cox Bike Park	7587	89.79
20023	Greg Cox Bike Park	3840	87.03
20024	Greg Cox Bike Park	4095	85.80
20025	Greg Cox Bike Park	5208	84.70
20026	Greg Cox Bike Park	4482	91.59
20027	Greg Cox Bike Park	17006	93.06
20028	Greg Cox Bike Park	4022	89.49

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
20029	Greg Cox Bike Park	7440	91.57
20304	Greg Cox Bike Park	6451	92.10
20305	Greg Cox Bike Park	6246	84.69
20306	Greg Cox Bike Park	10952	89.95
20307	Greg Cox Bike Park	7558	83.16
20309	Greg Cox Bike Park	4178	83.14
17306	Greg Cox Bike Park	3078	65.39
17104	Sweetwater Bike Park	3937	73.81
17106	Sweetwater Bike Park	5227	71.56
17107	Sweetwater Bike Park	2860	74.84
17108	Sweetwater Bike Park	4646	73.71
17110	Sweetwater Bike Park	11866	80.49
17303	Sweetwater Bike Park	3073	65.52
17304	Sweetwater Bike Park	5884	63.11
17305	Sweetwater Bike Park	3104	65.70
17401	Sweetwater Bike Park	5888	68.58
17403	Sweetwater Bike Park	4997	70.47
17404	Sweetwater Bike Park	6586	69.37
17501	Sweetwater Bike Park	2970	71.52
17502	Sweetwater Bike Park	3447	70.59
17601	Sweetwater Bike Park	5131	76.58
17603	Sweetwater Bike Park	2597	73.74
17604	Sweetwater Bike Park	7450	73.98
17701	Sweetwater Bike Park	5740	76.53
17702	Sweetwater Bike Park	3032	73.51
18100	Sweetwater Bike Park	6432	91.84
18200	Sweetwater Bike Park	7374	94.00
18300	Sweetwater Bike Park	2989	96.04
18400	Sweetwater Bike Park	4089	95.55
18504	Sweetwater Bike Park	7020	94.24
18507	Sweetwater Bike Park	9076	103.68
18509	Sweetwater Bike Park	5001	96.21
18510	Sweetwater Bike Park	2801	98.36
18511	Sweetwater Bike Park	5225	97.00
18512	Sweetwater Bike Park	4446	100.09
18513	Sweetwater Bike Park	9817	101.09
18514	Sweetwater Bike Park	8254	104.97
18515	Sweetwater Bike Park	5105	96.46
18516	Sweetwater Bike Park	3978	100.86
18517	Sweetwater Bike Park	4855	97.41
18518	Sweetwater Bike Park	2941	99.20
18519	Sweetwater Bike Park	5263	100.51
18601	Sweetwater Bike Park	4668	100.20
18603	Sweetwater Bike Park	6865	99.39
18608	Sweetwater Bike Park	3224	104.59
18609	Sweetwater Bike Park	5918	104.92
18610	Sweetwater Bike Park	6851	107.32
18612	Sweetwater Bike Park	3537	109.81
18613	Sweetwater Bike Park	3773	102.68
18614	Sweetwater Bike Park	6988	100.99
19203	Sweetwater Bike Park	2836	107.62
19205	Sweetwater Bike Park	6281	104.79
19206	Sweetwater Bike Park	5236	103.79
19207	Sweetwater Bike Park	8858	106.54
19208	Sweetwater Bike Park	3291	97.78
19301	Sweetwater Bike Park	6805	105.88
19302	Sweetwater Bike Park	7965	104.10

Before Study			
~~Zip Code~~ Census Tracts	Parks	Population	Round Trip Length
19303	Sweetwater Bike Park	7669	107.43
19403	Sweetwater Bike Park	6280	103.66
19404	Sweetwater Bike Park	3411	104.09
19405	Sweetwater Bike Park	3969	101.32
19406	Sweetwater Bike Park	4847	102.94
19501	Sweetwater Bike Park	3843	102.84
19502	Sweetwater Bike Park	5702	102.65
19503	Sweetwater Bike Park	5087	101.38
19601	Sweetwater Bike Park	6514	103.09
19602	Sweetwater Bike Park	5452	100.05
19701	Sweetwater Bike Park	6945	101.27
19702	Sweetwater Bike Park	5128	99.39
19805	Sweetwater Bike Park	4523	96.06
19808	Sweetwater Bike Park	5759	97.79
19809	Sweetwater Bike Park	4328	99.19
19902	Sweetwater Bike Park	4160	95.76
19903	Sweetwater Bike Park	4292	98.33
19904	Sweetwater Bike Park	7763	97.00
19905	Sweetwater Bike Park	5123	96.26
20017	Sweetwater Bike Park	3635	95.30
20018	Sweetwater Bike Park	7664	92.45
20019	Sweetwater Bike Park	7071	91.22
20020	Sweetwater Bike Park	7480	91.91
20021	Sweetwater Bike Park	6284	89.90
20022	Sweetwater Bike Park	7587	88.90
20023	Sweetwater Bike Park	3840	86.13
20024	Sweetwater Bike Park	4095	84.90
20025	Sweetwater Bike Park	5208	83.80
20026	Sweetwater Bike Park	4482	90.69
20027	Sweetwater Bike Park	17006	92.17
20028	Sweetwater Bike Park	4022	88.60
20029	Sweetwater Bike Park	7440	90.67
20304	Sweetwater Bike Park	6451	91.20
20305	Sweetwater Bike Park	6246	83.79
20306	Sweetwater Bike Park	10952	89.05
20307	Sweetwater Bike Park	7558	82.26
20309	Sweetwater Bike Park	4178	82.24
17306	Sweetwater Bike Park	3078	64.50
Overall Weighted Average			
	Sweetwater Bike Park		***45.36***
	Greg Cox Bike Park		***93.58***
	Pacific Highlands Ranch		***92.68***

Table 4: Non-Resident Bike Park User Round-Trip Travel Distance – With Project

After Study		
Parks	Population	Round Trip Length
Veterans Memorial Park	491269	***19.25***

Appendix J

Updated Multi-Modal Level of Service Analysis

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	7,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	7,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	7,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	7,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,400

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,400

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,400

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,400

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

*

*

* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,000

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,000

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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Future Transit
With Improvements

ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,000

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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Future Transit
With Improvements

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,000

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
Do any of the routes provide a single transfer to reach a COASTER station or mobility hub?	Yes	Yes
* **Closest distance to existing transit stop:**	1/4 to 1/2 mile walk to bus/rail	1/4 to 1/2 mile walk to bus/rail
What type of transit priority is present?	None present	None present
Headways between 6:30-8:30 am and 4-6 pm on weekdays:	30 minutes	30 minutes
Is there commute shuttle service provided during the morning and afternoon commute periods?	No	No
On weekends, are the headways no more than 1 hour headways between 9 am-5 pm?	No	No
Is there bike parking available at the bus stop?	No	No
Is the bus stop within 1/4 mile of a bike repair shop?	No	No
* **Is area governed by an adopted TDM ordinance that will promote ridesharing and/or the use of non-auto modes?**	No	No

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ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
0 | F	0 | F

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☐ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
Do the sidewalks or path to the transit stop appear to be ADA compliant?	Yes	Yes
Do multiple transit routes stop on the study segment?	Yes	Yes
Do any of the routes provide a direct link to a COASTER station or mobility hub?	Yes	Yes
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Is the bus stop within 1/4 mile of a bike repair shop?	No	No
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ROADWAY INFO

Roadway Name	Faraday Avenue
From	Cannon Road
To	North Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
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* *Indicates an essential feature that strongly supports and promotes the goals identifed in the Climate Action Plan (CAP).*

ROADWAY INFO

Roadway Name	Cannon Road
From	South Project Access
To	0.5 miles south/east of South Project Access
Street Typology from Mobility Element	Employment/Transit Connectors
Average Daily Traffic (ADT) volume (2-way total)	8,700

TRANSIT

NB SCORE | LOS	SB SCORE | LOS
95 | A	95 | A

	Roadway Direction	
	NB	**SB**
* **Transit stop amenities available:**	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users	☑ Bench ☐ Trash Cans ☐ Covered Bus Stop ☑ Well-lit Stops ☐ Stop located within a block of commercial users
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