

APPENDIX J
Transportation Memorandum

MEMORANDUM

DATE: April 4, 2023

To: Eric Lardy, City of Carlsbad, City Planner

FROM: Dean Arizabal, LSA, Principal

SUBJECT: Transportation Memorandum for the Three on Garfield Project in Carlsbad, California (LSA Project No. 20230874)

The purpose of this transportation memorandum is to describe and document potential transportation impacts associated with the implementation of the proposed Three on Garfield Project (project). This technical information is provided for project review under the California Environmental Quality Act (CEQA).

PROJECT LOCATION

The 0.16-acre project site is at 2685, 2687, and 2689 Garfield Street in Carlsbad, San Diego County, California. The project site is currently developed with an attached three-unit, air-space condominium building. A full-access driveway on Beech Avenue provides vehicular access to the project site. Figure 1 depicts the project location (all figures are provided in Attachment A).

The project site is surrounded by residential units and open space. The project site is bounded by a mix of single- and multi-family residences to the north and west, a vacant lot and a parking lot to the south, and a City of Carlsbad (City) park with a historical building to the east.

PROJECT DESCRIPTION

The proposed project would construct three attached, air-space condominium units to replace the existing condominium units on site. The proposed building would have a total of 5,118 square feet (sf). Two condominium units would have two bedrooms while the third condominium unit would have three bedrooms. The units would range in size from 1,701 to 1,713 sf. Each unit would include an attached two-car garage for a total of six parking spaces. In addition, one guest parking space would be provided along the building exterior on the north side of the site. Direct vehicular access to the proposed project would continue to be provided via a full-access driveway on Beech Avenue. Figure 2 illustrates the project site plan.

The proposed project would reconstruct the full-access driveway on site and provide a wider curb cut and concrete apron at the driveway connection with Beech Avenue. The proposed project would also reconstruct the existing sidewalk and Americans with Disabilities Act (ADA) ramp at the northwest corner of the intersection of Garfield Street and Beech Avenue.

TRANSPORTATION ANALYSIS

This section includes an analysis of the project's impacts to the transportation system based on the significance thresholds in Appendix G of the *State CEQA Guidelines* and provides a thorough justification for the conclusions provided herein.

Regulatory Setting

The following is a summary of State, regional, and local regulations that apply to transportation and circulation within the project study area.

State

Senate Bill 743. On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and codified a process that revises the approach to determining transportation impacts and mitigation measures under CEQA. SB 743 directed the Governor's Office of Planning and Research (OPR) to administer new CEQA guidance for jurisdictions by replacing the focus on automobile vehicle delay and level of service (LOS) or other similar measures of vehicular capacity or traffic congestion in the transportation impact analysis with vehicle miles traveled (VMT). This change shifts the focus of the transportation impact analysis from measuring impacts to drivers (e.g., the amount of delay and LOS at an intersection) to measuring the impact of driving on the local, regional, and statewide circulation system and on the environment. This shift in focus is expected to better align the transportation impact analysis with the statewide goals related to reducing greenhouse gas emissions, encouraging infill development, and promoting public health through active transportation. As a result of SB 743, the California Office of Administrative Law cleared the revised *State CEQA Guidelines* on December 28, 2018, with a statewide implementation date of July 1, 2020. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory)¹ provides a resource for agencies to use at their discretion.

Regional

San Diego Association of Governments (SANDAG). SANDAG is an association of governments that addresses regional issues, including improving equity, transportation, air quality, clean energy, economic development, goods movement, public health, public safety, and housing. Its members include the County of San Diego and the 18 cities in San Diego County. As a Metropolitan Planning Organization (MPO), SANDAG is responsible for developing long-range regional transportation plans, including sustainable communities strategy and growth forecast components, regional transportation improvement programs, and regional housing needs allocations.

¹ Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December. p. 12.

Local

City of Carlsbad. The project is located in Carlsbad. As such, the Mobility Element of the *City of Carlsbad General Plan*¹ and the *City of Carlsbad Vehicle Miles Traveled Analysis Guidelines*² are the guidance documents for the City's transportation system. These guidelines are intended to ensure that the transportation impacts of a development proposal are adequately addressed.

Environmental Setting

Existing Circulation System

Garfield Street is a two-lane, local street along the northeast project frontage. Beech Avenue is a two-lane, local street along the southeast project frontage. Sidewalks are provided on both sides of Garfield Street and Beech Avenue. On-street parking is permitted on both sides of Garfield Street and Beech Avenue.

Impact Analysis

- a. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Less Than Significant Impact. The proposed project would not increase the number of units on site or the trip generation of the site. The proposed project would implement the following objectives:

- Demolish the existing condominium building and three units that have structural, foundation, and moisture/mold issues.
- Construct three new condominium units and revise access so that it complies with current City regulations and standards.
- Construct new housing near employment centers, infrastructure, and public utilities.
- Redevelop an infill site identified as a residential site in the City's Housing Element.
- Utilize project design features to ensure compatibility with adjacent residential land uses.

The proposed project would not make any changes to the public right-of way in the project vicinity or modify any transportation facilities (e.g., vehicular, transit, bicycle, or pedestrian). The project would not preclude alternative modes of transportation or facilities (e.g., transit, bicycle, or pedestrian). Therefore, the project would not conflict with the Mobility Element of the City of Carlsbad General Plan, an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Impacts would be less than significant and no mitigation is required.

¹ City of Carlsbad. 2015. General Plan Mobility Element. June. Website: <https://www.carlsbadca.gov/home/showpublisheddocument/3422/637434861095100000> (accessed February 2023).

² City of Carlsbad. 2022. *City of Carlsbad Vehicle Miles Traveled Analysis Guidelines*. October.

b. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?*

Less Than Significant Impact. *State CEQA Guidelines* Section 15064.3, subdivision (b), states that transportation impacts for land use projects are to be measured by evaluating the project's VMT or the amount and distance of automobile travel attributable to the project, as outlined in the following:

Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

The *City of Carlsbad Vehicle Miles Traveled Analysis Guidelines*, which are generally based on the OPR Technical Advisory, were used for addressing the VMT of the proposed project.

The *City of Carlsbad Vehicle Miles Traveled Analysis Guidelines* include VMT screening criteria for projects that would have a less than significant transportation impact due to type or location. If a project meets at least one of the six following screening criteria, a detailed VMT analysis is not required, and it is presumed to have a less than significant transportation impact:

- **Small Project:** A project that generates less than 110 daily trips
- **Project Located Near Transit:** A project that is within 0.5 mile of an existing major transit stop, planned major transit stop, or a stop/transit center along a high-quality transit corridor (e.g., Carlsbad Village Station, Carlsbad Poinsettia Coaster Station, or Plaza Camino Real Transit Center)
- **Local-Serving Retail and Similar Land Use:** A project that tends to attract trips from adjacent areas that would have otherwise been made to more distant retail or similar land use location
- **Local-Serving Public Facility:** Similar to a local-serving retail or similar land use, a project that would attract trips from nearby areas that would have otherwise been made to a more distant location (including government facilities intended to serve the local public, parks, public elementary schools, public middle schools, and public high schools)
- **Affordable Housing Projects:** Residential projects that are 100 percent affordable housing in infill areas
- **Redevelopment Projects That Result in a Net Reduction of VMT**

The proposed project would demolish three existing condominium units and construct three new condominium units. Because the proposed project would not increase the units on site, it would not increase the trip generation of the site. In addition, the project site is a 0.3-mile walk from the Carlsbad Village Station. As such, the proposed project meets the City's VMT screening criteria for

both a Small Project (generating less than 110 daily trips) and a Project Located Near Transit (within 0.5 mile of a major transit stop). Therefore, the proposed project would not conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3(b), and the proposed project would have a less than significant impact. No mitigation is required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The proposed project (including the demolition of three existing condominium units, construction of three new condominium units, and provision of an improved full-access driveway on Beech Avenue) would be designed and constructed to City regulations and standards. As such, the proposed project would not substantially increase hazards for vehicles due to a geometric design feature or incompatible uses, and impacts would be less than significant. No mitigation is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Site access would continue to be provided from a full-access driveway on Beech Avenue. Since the proposed project would improve this full-access driveway per City standards, emergency access to the site would not be affected. Therefore, impacts associated with emergency access would be less than significant. No mitigation is required.

Attachment: A – Figures 1 and 2

ATTACHMENT A

FIGURES 1 AND 2

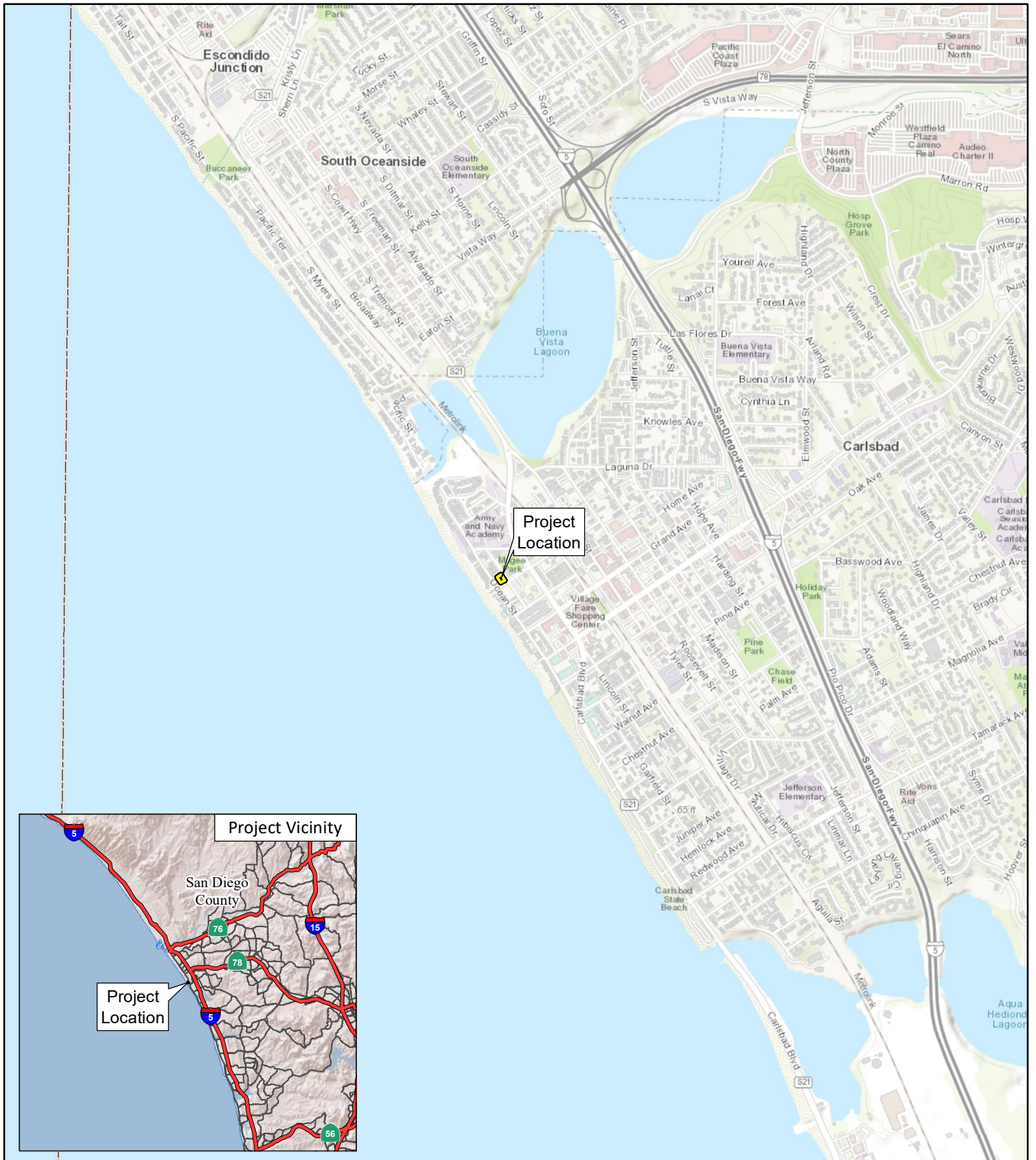


FIGURE 1

LSA

LEGEND

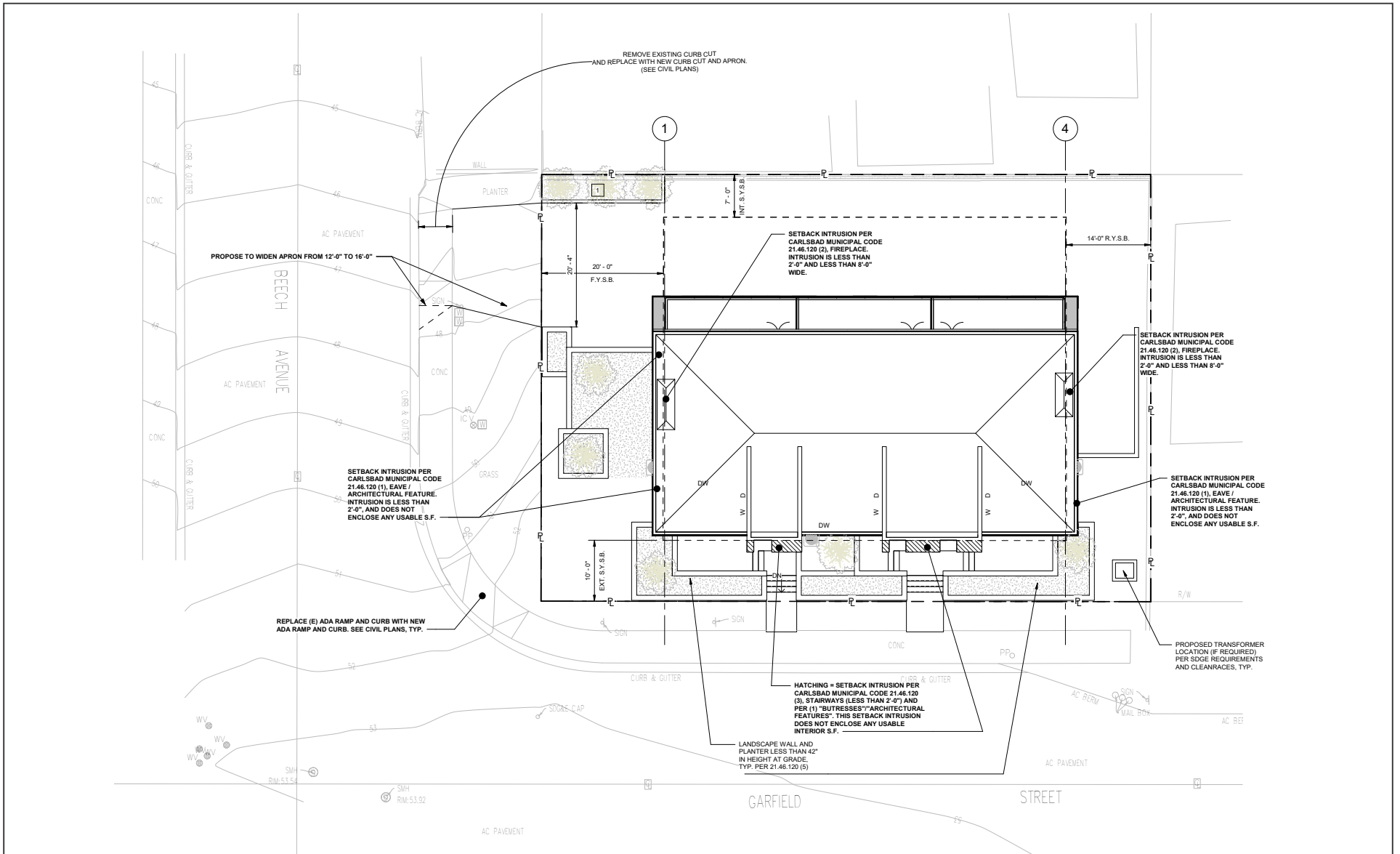
 Project Location



0 1000 2000
FEET

SOURCE: USGS 7.5' Quad - San Luis Rey (1975), Oceanside (1975), CA
J:\20230874\GIS\MXD\ProjectLocation_StreetMap.mxd (3/17/2023)

Three on Garfield Project
Project Location and Vicinity



LSA

FIGURE 2



SOURCE: BGI Architecture