

APPENDIX H
VEHICLE MILES TRAVELED ANALYSIS

VEHICLE MILES TRAVELED ANALYSIS
CHICK-FIL-A
I-5 & PALOMAR AIRPORT ROAD
Carlsbad, California
October 27, 2020

LLG Ref. 3-19-3103

EXECUTIVE SUMMARY

The Chick-fil-A I-5 & Palomar Airport Road project (“Project”) proposes the demolition of an existing 11,000 square foot (SF), two-story standard commercial office building and the construction of a 3,427 SF Chick-fil-A fast-food restaurant on the site. At this time, the Project does not propose a drive-thru service window. The overall Project site is a commercial development located on the northeast corner of the Palomar Airport Road/Avenida Encinas intersection in the city of Carlsbad. Within this commercial development, the Project itself is located on the northernmost part of the property, north of an In-n-Out drive-thru fast food restaurant. The other land uses on the commercial parcel are generally sit-down, high-turnover restaurants. The Project will be served by two proximate driveways; a full-access unsignalized driveway and a secondary, right-in/right-out driveway, both to Avenida Encinas.

Two distinct analyses are needed to comply with the City of Carlsbad Transportation Impact Analysis (TIA) Guidelines and the California Environmental Quality Act (CEQA). This report provides vehicle miles traveled (VMT) analysis conducted per the City of Carlsbad guidelines to meet CEQA requirements.

Provided under separate cover, intersection queuing and multi-modal level of service (MMLOS) were evaluated to meet Transportation Impact Analysis Guidelines requirements. Evaluation of Project access intersections, with signal warrants prepared where necessary, is also included in the Local Mobility Analysis (LMA).

Using the City of Carlsbad guidelines, the Project screens out from requiring a detailed VMT analysis given the land use is categorized as local-serving retail, less than 50,000 SF. The Project is presumed to have a less than significant impact and no further analysis is required.

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1.0 INTRODUCTION

1.1 Project Description

The Project proposes to demolish an existing 11,000 SF standard commercial office building and construct a 3,427 SF Chick-fil-A fast-food restaurant (no drive-thru window service).

The Project site located on the north side of a large existing commercial development on the northeast corner of the Palomar Airport Road/Avenida Encinas signalized intersection. The site is located adjacent to the west side of Interstate 5 along Avenida Encinas. Cannon Road is the major arterial roadway to the north, while Palomar Airport Road is the major arterial roadway to the south. The Project is located at the northern end of the larger commercial development with proximate driveway access provided by a full-access unsignalized driveway (Main Project Driveway) south of the building, and a secondary right-in/right-out unsignalized driveway (N. Project Driveway) located north of the building.

An In-n-Out fast-food restaurant is located proximate to the Project to the south, while several larger “sit-down, high-turnover” restaurants are located to the south within the overall commercial development. The overall commercial development could be described as a “freeway commercial restaurant row”.

Figure 1–1 shows the vicinity map. *Figure 1–2* shows a more detailed Project area map. *Figure 1–3* shows the Project site plan.

1.2 Project Impact Analyses

Two distinct analyses are needed to meet requirements for City of Carlsbad Transportation Impact Analysis requirements and the California Environmental Quality Act (CEQA).

The CEQA Analysis is based on the City’s *Vehicle Miles Traveled Analysis Guidelines*, dated June 2, 2020. In January 2016, the Governor’s Office of Planning and Research (OPR) issued Draft Guidance, which provided recommendations for updating the State’s CEQA Guidelines in response to SB 743 and recommended practice for VMT analysis in an accompanying *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory). OPR’s most recent Technical Advisory is dated December 2018.

In December 2018, after over five years of stakeholder-driven development, the California Natural Resource Agency certified and adopted the CEQA Statute. Per the CEQA Statute, a lead agency may

elect to be governed by the VMT guidelines immediately. However, beginning July 1, 2020, the VMT guidelines shall apply statewide.

The methodology in the City's guidelines are consistent with the OPR Technical Advisory and the local Institute of Transportation Engineers (ITE) San Diego Regional Guidelines, dated May 2019. As such, the approach and methodology contained in this report represents the guidance presented in the City's document.

Analysis of the local street system, including roadway segments, signalized intersections (queuing at turn lanes), and multimodal (i.e., pedestrian, bicycle, transit) level of service (LOS) based on the *City of Carlsbad Transportation Impact Analysis Guidelines* is provided under separate cover.

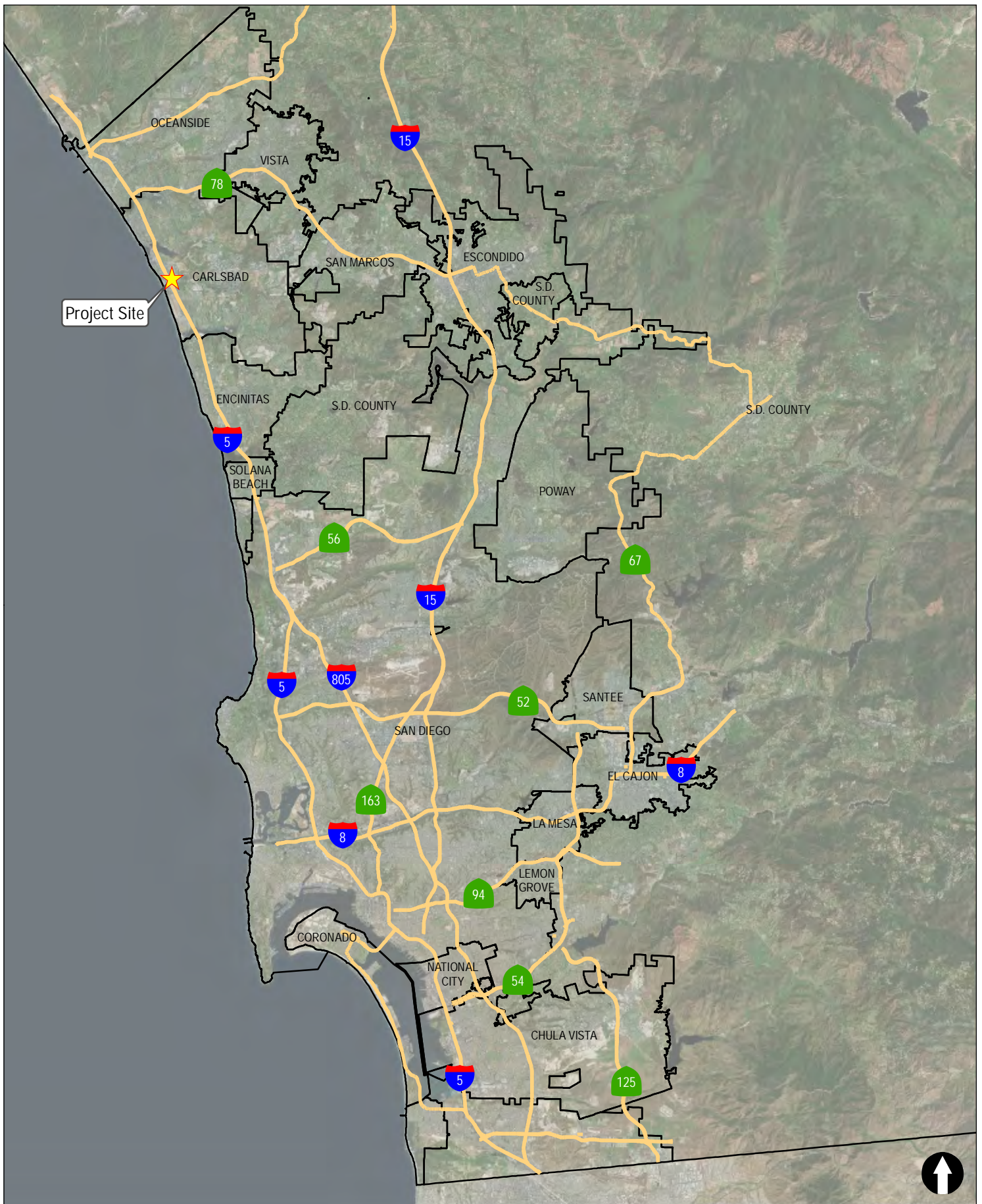
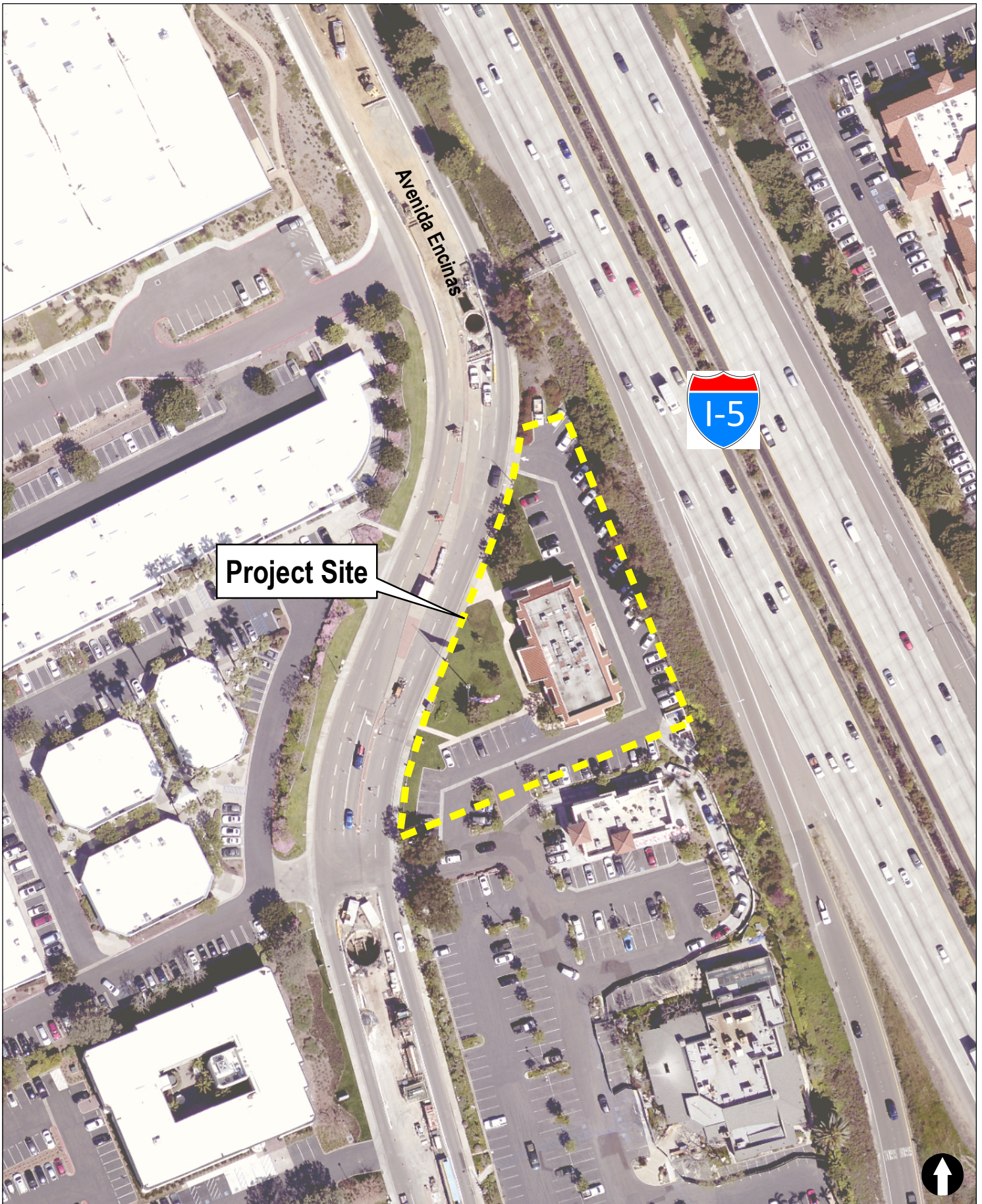


Figure 1-1

Vicinity Map



Project Site



Figure 1-2
Project Area Map

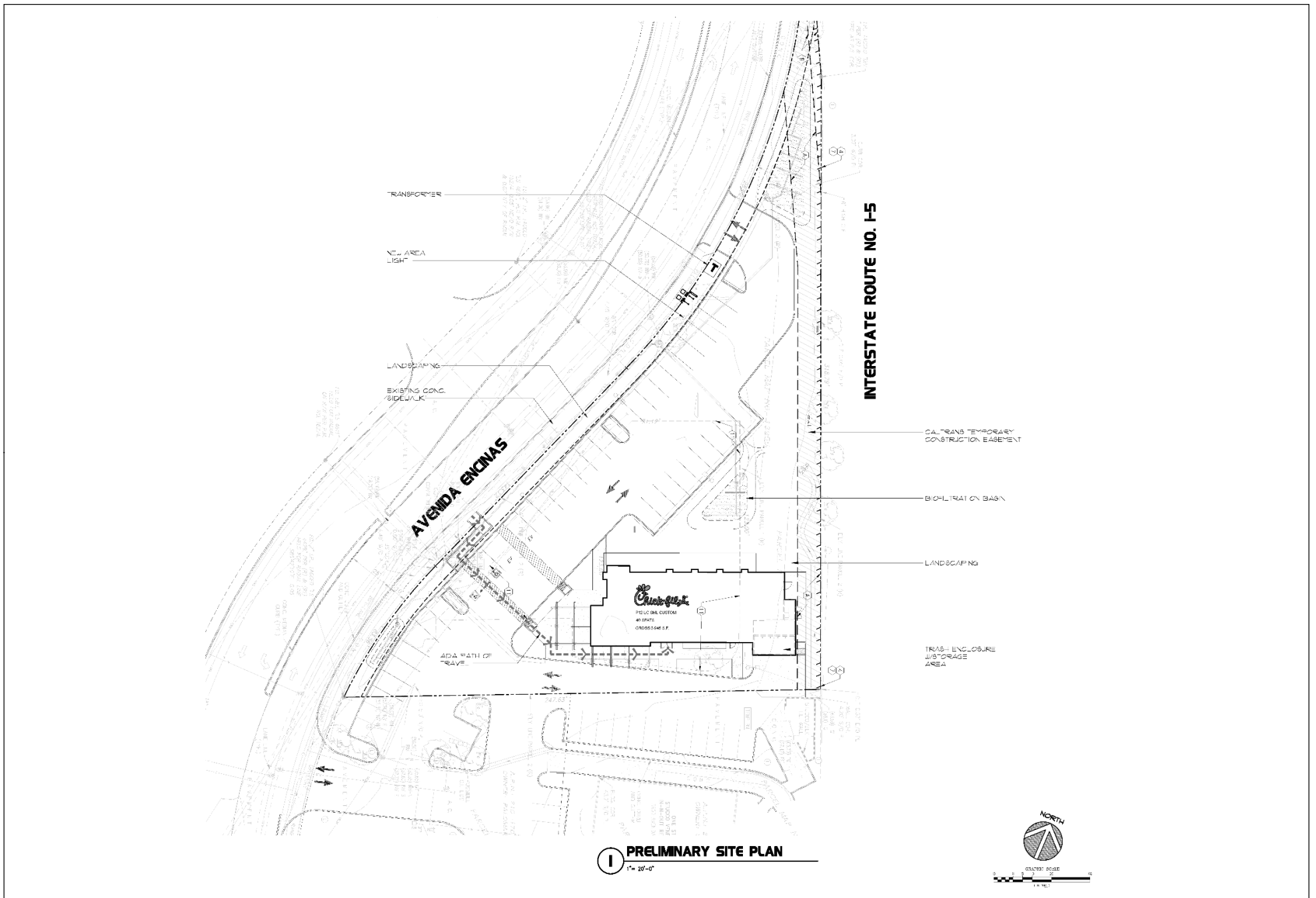


Figure 1-3
Project Site Plan

2.0 ANALYSIS APPROACH & METHODOLOGY

2.1 Vehicle Miles Traveled Analysis Methodology

Vehicle miles traveled (VMT) evaluation is based on the City's *Vehicle Miles Traveled (VMT) Analysis Guidelines* dated June 2, 2020. The thresholds of significance and screening criteria presented in these guidelines were approved by City Council via resolution June 16, 2020.

In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies VMT as the most appropriate CEQA transportation metric, along with the elimination of Auto Delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions.

In December 2018, after over five years of stakeholder-driven development, the California Natural Resource Agency certified and adopted the CEQA Statute. Per the CEQA Statute, a lead agency may elect to be governed by the VMT guidelines immediately. However, beginning July 1, 2020, the VMT guidelines shall apply statewide.

The methodology in the City's guidelines are consistent with the OPR Technical Advisory and the local Institute of Transportation Engineers (ITE) San Diego Regional Guidelines, dated May 2019. As such, the approach and methodology contained in this report represents the guidance presented in the City's document.

2.2 Thresholds of Significance

According to the City of Carlsbad's *Vehicle Miles Traveled Analysis Guidelines* dated June 2, 2020, the transportation VMT thresholds of significance are shown in **Table 2-1**.

**TABLE 2-1
VMT SIGNIFICANCE THRESHOLDS**

Land Use Type	Thresholds for Determination of a Significant Transportation VMT Impact
Residential Projects	A significant transportation impact occurs if the project VMT per capita exceeds a level 15% below the citywide average city VMT per capita
Office Projects	A significant VMT impact occurs if the project VMT per employee exceeds a level 15% below regional average VMT per employee
Regional Retail Projects	A significant VMT impact occurs if the project results in a net increase in VMT
Industrial Employment	A significant VMT impact occurs if the project VMT per employee exceeds the regional average VMT per employee
Transportation Projects	Significant VMT impact occurs if the project results in a net increase in VMT

Source: City of Carlsbad's Vehicle Miles Traveled Analysis Guidelines dated June 2, 2020

3.0 VEHICLE MILES TRAVELED

This Vehicle Miles Traveled (VMT) analysis studies the potential transportation impacts due to the Project on VMT to satisfy the California Environmental Quality Act (CEQA) guidelines which utilize VMT as the measure of effectiveness.

3.1 Overview and Background

This section presents an overview and background on VMT and the implementation of California State Law Senate Bill 743 (SB 743) requiring its use in the evaluation of transportation impacts for CEQA.

3.1.1 Senate Bill 743

In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Within the State's CEQA Guidelines, these changes include the elimination of Auto Delay, LOS, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies VMT as the most appropriate CEQA transportation metric, along with the elimination of Auto Delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions. The legislation was also intended to incentivize development in and around Transit Priority Areas (TPAs) and High-Quality Transit Corridors (HQTCs), and to encourage high density infill and mixed-use projects. The three (3) stated goals of the SB 743 legislation as defined in SB 743, the Public Resources Code section 21099, and the OPR Technical Advisory are 1.) promote the reduction of greenhouse gas emissions, 2.) the development of multimodal transportation networks, and 3.) a diversity of land uses

In January 2016, the Governor's Office of Planning and Research (OPR) issued Draft Guidance, which provided recommendations for updating the State's CEQA Guidelines in response to SB 743 and recommended practice for VMT analysis in an accompanying "*Technical Advisory on Evaluating Transportation Impacts in CEQA*" (Technical Advisory). OPR's most recent Technical Advisory is dated December 2018.

In December 2018, after over five years of stakeholder-driven development, the California Natural Resource Agency certified and adopted the CEQA Statute. Per the CEQA Statute, a lead agency may elect to be governed by the VMT guidelines immediately. However, beginning July 1, 2020, the VMT guidelines shall apply statewide.

3.1.2 VMT Background

VMT is defined as the "amount and distance of automobile travel attributable to a project" per CEQA Guidelines Section 15064.3. VMT is a measure of the use and efficiency of the transportation network as well land uses in a region. VMTs are calculated based on individual vehicle trips

generated and their associated trip lengths. VMT accounts for two-way (roundtrip) travel and is estimated for a typical weekday for the purposes of measuring transportation impacts.

3.2 City of Carlsbad Technical Guidance

LLG obtained and reviewed the City’s *Vehicle Miles Traveled (VMT) Analysis Guidelines* (guidelines) dated June 2, 2020. The thresholds of significance and screening criteria utilized in the City VMT guidelines were approved by City Council resolution on June 16, 2020. The methodology in the City’s guidelines are consistent with the OPR Technical Advisory and the local Institute of Transportation Engineers (ITE) San Diego Regional Guidelines, dated May 2019.

3.2.1 Screening Criteria

The project was reviewed against the City’s screening criteria to determine if a VMT study is necessary. The City’s guidelines identify the following six cases where a development project would be considered to screen out of a VMT analysis based on a presumption that its VMT effects would be less than significant:

1. Small Projects (less than 110 ADT)
2. Projects Located Near Transit (projects located within one-half mile of the Carlsbad Village or Carlsbad Poinsettia Coaster Stations, or within one-half mile of the Plaza Camino Real Transit Station)
3. Local-Serving Retail and Similar Land Uses (defined as retail development less than 50,000 SF, or larger than 50,000 SF with a market study showing it serves primarily local uses)
4. Local Serving Public Facilities (i.e., government uses, parks and public schools, etc.)
5. Affordable Housing Projects (residential projects that are 100% affordable located within infill areas)
6. Redevelopment Projects That Result in a Net Reduction in VMT (projects that replace an existing development with a more efficient land use)

The 3,427 SF proposed project qualifies as a “local-serving retail development less than 50,000 SF.” As such, the project screens out from requiring a VMT analysis and is presumed less than significant.

3.3 Project VMT Analysis

Using the City of Carlsbad guidelines, the project screens out from requiring a VMT analysis given the land use is categorized as local-serving retail, less than 50,000 SF. Per OPR’s Technical Advisory, as reiterated in the City’s guidelines, “local-serving retail uses are presumed to have a less than significant impact on VMT since they tend to attract trips from adjacent areas that would have otherwise been made to more distant retail locations.” Thus, no further analysis is required.

4.0 CONCLUSIONS

Given the Project is presumed to have a less than significant impact per the City's guidelines, the project is presumed to have a less than significant impact and no mitigation measures are necessary.

End of Report