
Appendix L

Draft Vehicle Miles Traveled Analysis (2022)

Guajome Lake Subdivision (83 lots)
2839 Guajome Lake Road
City of Oceanside
May 4, 2022

Draft Vehicle Miles Traveled Analysis

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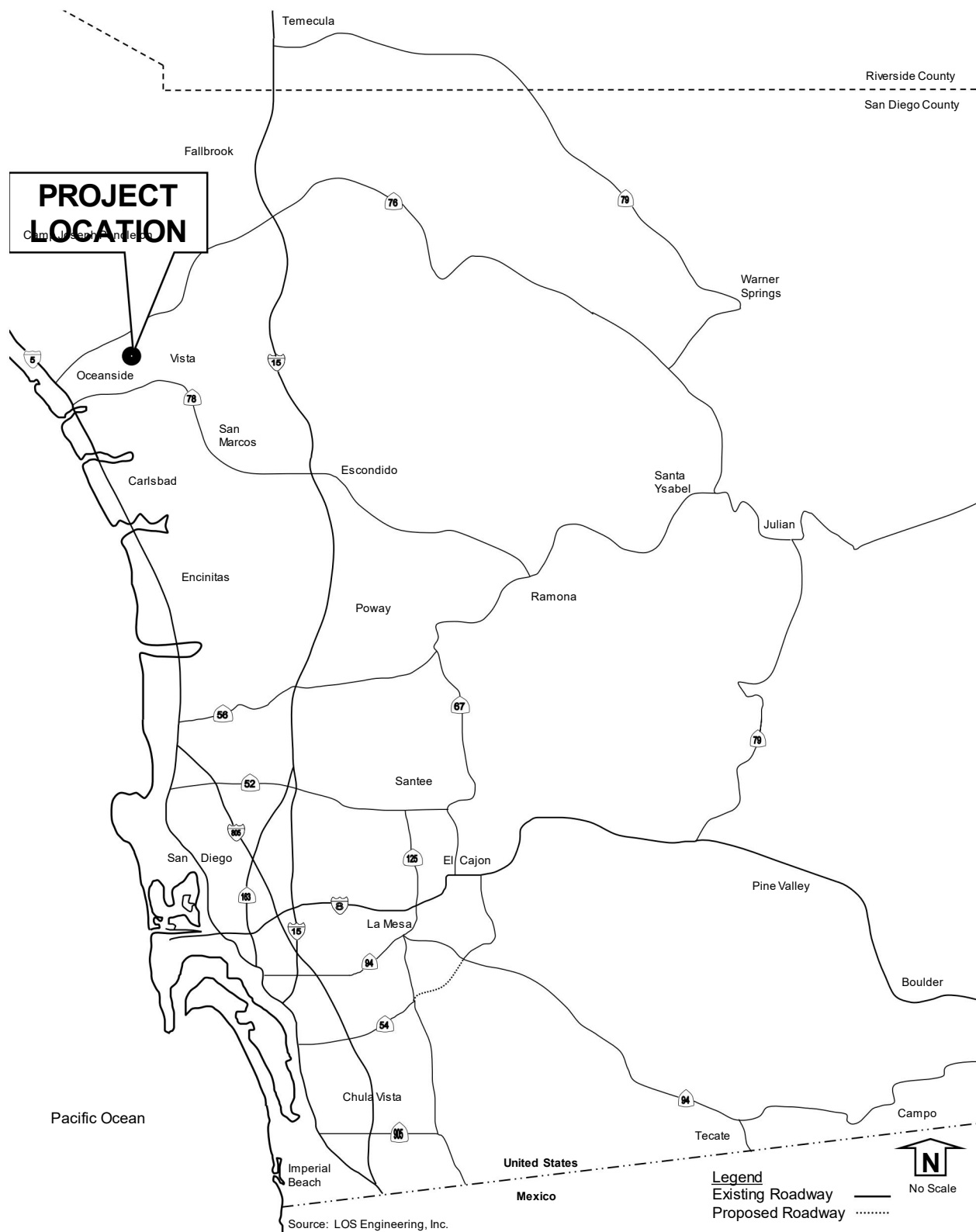
1.0 Introduction

This report includes a Vehicle Miles Traveled (VMT) analysis to determine if there is a potential California Environmental Quality Act (CEQA) VMT transportation impact based on the City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020 (“Traffic Guidelines”).

The proposed residential single family home subdivision of up to 83 lots is located at 2839 Guajome Lake Road in Oceanside, California. The project site of approximately 16.6 acres has one single family home. The general location of the project is shown in **Figure 1**. A preliminary site plan is shown in **Figure 2**.



Figure 1: Project Location



[illegible]

2.0 Vehicle Miles Traveled

A VMT analysis is required to satisfy the CEQA guidelines that utilize VMT as the measure of effectiveness for determining transportation impacts. The California Governor's Office of Planning and Research (OPR) Technical Advisory developed guidance on implementing Senate Bill 743 (SB 743) that shifts the transportation impact measure of effectiveness from Level of Service (LOS) to VMT. The OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 states on page 8 "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance". Excerpts from the OPR Technical Advisory are included in **Appendix A**.

The City of Oceanside Traffic Guidelines have identified several project types that are presumed to be considered VMT reducing projects (excerpts included in **Appendix B**). The Traffic Guidelines state on page 9:

"SB 743 eliminates the need for some projects to be analyzed for CEQA purposes that support VMT reduction, these projects are considered screened out for VMT analysis. Screened out is defined as projects not needed to be analyzed for CEQA purposes that already support VMT reduction."

"The projects listed in Table 2 [Traffic Guidelines page 10] are presumed to be considered VMT-reducing projects. The projects listed are either locally serving or are based on substantial evidence provided by the OPR Technical Advisory Committee supporting SR 743 implementation."

The list of screened out project types are shown in **Table 1** (from Table 2, page 10 of the Traffic Guidelines). The project is a candidate for the following screening criteria:

- 1) If the project trip generation is less than the 1,000 ADT and the Project is consistent with the General Plan, then the project is screened out from further VMT analysis.

The City of Oceanside has developed a Project Information Form (PIF) to document if a project can screen out from a detailed VMT analysis. A City approved PIF documenting how this project is screened out from a detailed VMT analysis is included in **Appendix C**.



TABLE 1: CITY OF OCEANSIDE VMT SCREENED OUT PROJECTS

Project Type
Projects located in a Transit Priority Areas (TPA) or Smart Growth Opportunity Area as identified in the most recent SANDAG San Diego Forward Regional Plan and is consistent with the General Plan at the time of project application. ⁽¹⁾⁽²⁾
Projects located in a low-VMT generating area identified on the most recent SANDAG SB 743 VMT Screening map
Locally serving K-12 schools
Day care centers
Local parks
Locally serving retail uses less than 50,000 square feet, including: gas stations, banks, restaurants, grocery stores, and shopping centers
Community institutions (Public libraries, fire stations, local government)
Locally serving hotels (e.g. non-destination hotels, non-regionally serving)
Student housing projects on or adjacent to college campuses
Local serving community colleges that are consistent with the assumptions noted in the most recent SANDAG Regional Transportation Plan/Sustainable Communities Strategy
Affordable housing projects ⁽³⁾
Assisted living facilities
Senior housing (as defined by HUD)
Transit projects
Bike projects
Pedestrian projects
Safety improvement projects (e.g. RRFBs and high visibility crosswalks at uncontrolled locations, pedestrian count down timers, additionally projects identified through the Highway Safety Improvement Program)
Safe Routes to School
Projects generating less than 500 daily vehicle trips (if inconsistent with adopted General Plan)
Projects generating less than 1,000 daily vehicle trips (if consistent with adopted General Plan)

Source: City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020

(1) Projects located in a TPA must be able to access the transit station within a ½ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).

(2) Smart Growth Opportunity Area Map is provided in Appendix B. The most recent version available shall be used.

(3) If a project is a mix of affordable housing and market rate housing or unscreened use, only the affordable housing component would qualify as screened out. Additionally, any removal of affordable housing automatically requires CEQA VMT analysis.



2.1 Projects Generating < 1,000 ADT (if consistent with General Plan)

The City of Oceanside Traffic Guidelines state that projects consistent with the adopted General Plan and generating less than 1,000 ADT are screen out from a further VMT analysis.

The project daily trip generation is calculated based on the SANDAG trip rates from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002. The project with 83 single family dwelling units is calculated to generate 830 ADT (83 du x 10 du/acre).

The project traffic generation at 830 ADT is less than the 1,000 ADT City established threshold for requiring a detailed VMT analysis; therefore, no further VMT analysis is required.



3.0 Conclusion

This VMT analysis was based on guidance from the Governor's Office of Planning and Research (OPR) Technical Advisory and the City of Oceanside Traffic Guidelines. OPR developed guidance for implementing Senate Bill 743 (SB 743) requirements that shifts the transportation impact measure of effectiveness from Level of Service (LOS) to VMT.

The City of Oceanside Traffic Guidelines were adopted by City Council in August 2020. The Traffic Guidelines identify several project types that are presumed to be considered VMT reducing projects as they are either locally serving or based on substantial evidence provided by the OPR Technical Advisory Committee supporting SR 743 implementation.

The project satisfied one of the City's criteria to screen out from further VMT analysis. The satisfied criterion includes:

- 1) The project is consistent with the General Plan and is calculated to generate 830 ADT, which is less than the 1,000 ADT threshold for further VMT Analysis. Therefore, the project is screened out and further VMT Analysis is NOT required.



Appendix A

Excerpts from OPR Technical Advisory

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA



December 2018

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific “criteria for determining the significance of transportation impacts of projects[.]” (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on “thresholds of significance.” The CEQA Guidelines define a “threshold of significance” to mean “an identifiable **quantitative, qualitative¹² or performance level** of a particular environmental effect, non-compliance with which means the effect will **normally** be determined to be significant by the agency and compliance with which means the effect **normally** will be determined to be less than significant.” (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, “provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” (*Id.* at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (*Id.* at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy, completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR’s recommendations regarding thresholds of significance for VMT set forth below.

¹² Generally, qualitative analyses should only be conducted when methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance.

(*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own thresholds.

The VMT metric can support the three statutory goals: “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Pub. Resources Code, § 21099, subd. (b)(1), emphasis added.) However, in order for it to promote and support all three, lead agencies should select a significance threshold that aligns with state law on all three. State law concerning the development of multimodal transportation networks and diversity of land uses requires planning for and prioritizing increases in complete streets and infill development, but does not mandate a particular depth of implementation that could translate into a particular threshold of significance. Meanwhile, the State has clear quantitative targets for GHG emissions reduction set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified. Tying VMT thresholds to GHG reduction also supports the two other statutory goals. Therefore, to ensure adequate analysis of transportation impacts, OPR recommends using quantitative VMT thresholds linked to GHG reduction targets when methods exist to do so.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide GHG emissions reductions to 1990 levels by 2020 and continued reductions beyond 2020.
- Senate Bill 32 (2016) requires at least a 40 percent reduction in GHG emissions from 1990 levels by 2030.
- Pursuant to Senate Bill 375 (2008), the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies (RTP/SCS). Current targets for the State's largest MPOs call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035.
- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

Appendix B

Excerpts from City of Oceanside VMT and LOS Guidelines

City of Oceanside

Traffic Impact Analysis Guidelines for

Vehicle Miles Traveled (VMT) and Level of Service Assessment



August 2020
Final Version

Table 2 – Screened Out Projects

Project Type
Projects located in a Transit Priority Areas (TPA) or Smart Growth Opportunity Area as identified in the most recent SANDAG San Diego Forward Regional Plan and is consistent with the General Plan at the time of project application. ⁽¹⁾⁽²⁾
Projects located in a low-VMT generating area identified on the most recent SANDAG SB 743 VMT Screening map
Locally serving K-12 schools
Day care centers
Local parks
Locally serving retail uses less than 50,000 square feet, including: gas stations, banks, restaurants, grocery stores, and shopping centers
Community institutions (Public libraries, fire stations, local government)
Locally serving hotels (e.g. non-destination hotels, non-regionally serving)
Student housing projects on or adjacent to college campuses
Local serving community colleges that are consistent with the assumptions noted in the most recent SANDAG Regional Transportation Plan/Sustainable Communities Strategy
Affordable housing projects ⁽³⁾
Assisted living facilities
Senior housing (as defined by HUD)
Transit projects
Bike projects
Pedestrian projects
Safety improvement projects (e.g. RRFBs and high visibility crosswalks at uncontrolled locations, pedestrian count down timers, additionally projects identified through the Highway Safety Improvement Program)
Safe Routes to School
Projects generating less than 500 daily vehicle trips (if inconsistent with adopted General Plan)
Projects generating less than 1,000 daily vehicle trips (if consistent with adopted General Plan)

(1) Projects located in a TPA must be able to access the transit station within a ½ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).

(2) Smart Growth Opportunity Area Map is provided in **Appendix B**. The most recent version available shall be used.

(3) If a project is a mix of affordable housing and market rate housing or unscreened use, only the affordable housing component would qualify as screened out. Additionally, any removal of affordable housing automatically requires CEQA VMT analysis.

8.0 DETERMINING PROJECT STUDY REQUIREMENTS

Figure 8-1 helps guide development projects in determining the requirements from a local and state perspective in order to help determine study requirements. The screening flowchart indicates an overview of the circumstances where a detailed CEQA VMT analysis would or would not be required and when a project would require a Local Transportation Study or Local Transportation Assessment. The City maintains the discretion to require a project to conduct additional analysis if needed.

Appendix C

City of Oceanside Project Information Form

PROJECT INFORMATION FORM (PIF)

THE FOLLOWING IS TO BE COMPLETED BY THE PROJECT APPLICANT:

PROJECT INFORMATION FORM			
1.	PROJECT DESCRIPTION:	Residential development of 83 single family detached homes	
2.	PROJECT LOCATION:	2839 Guajome Lake Rd (on the east side of Guajome Lake Rd south of Albright St)	
3.	LAND USE:	Single Family Detached Residential (SFD-R)	
	SIZE/DENSITY:	83 dwelling units on 16.6 acres (5 du/acre)	
4.	ZONING AND LAND USE CONSISTENT WITH ADOPTED GENERAL PLAN?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5.	PROJECT LOCATED IN TRANSIT PRIORITY AREA¹, SMART GROWTH AREA², OR LOW VMT AREA³?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
6.	PROJECT TRIP GENERATION:	<div style="border: 1px solid black; display: inline-block; padding: 2px 10px;">830</div> ADT <div style="margin-left: 10px;"> <input type="checkbox"/> < 200 ADT <input checked="" type="checkbox"/> ≥ 200 ADT <input type="checkbox"/> ≥ 1,000 ADT <input type="checkbox"/> ≥ 2,400 ADT </div>	
ATTACHMENTS			
A.	PROJECT LOCATION MAP	<input checked="" type="checkbox"/> Attached	
B.	PROJECT TRIP DISTRIBUTION	<input checked="" type="checkbox"/> Attached	
C.	PROJECT TRIP ASSIGNMENT	<input checked="" type="checkbox"/> Attached	

1) Projects located in a TPA must be able to access the transit station within a ¼ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).

(2) See Appendix B.

(3) Based on the most recent SANDAG SB 743 Screening Map. Example shown in Appendix C.

TO BE COMPLETED BY CITY STAFF AND RETURNED TO PROJECT APPLICANT

PROJECT STUDY REQUIREMENTS			
1)	Does the project require a CEQA VMT analysis?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
	A. If yes, does the project require a SANDAG Model Run?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2a)	Does the project require a Local Transportation Study?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
OR			
2b)	Does the project require a Local Transportation Assessment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

⁽¹⁾ Incomplete application or additional information is needed to determine study requirements.

3-5-22

Planning Division Date

Tam Tran

Digitally signed by Tam Tran
DN: cn=Tam Tran,
ou=Engineering,
email=TTran@oceansideca.org
Date: 2022.04.05 14:29:16 -07'00'

Transportation Engineering Section

Date

Guajome Lake Road (ADM21-00079) PIF Support Materials

Project Trip Generation

Proposed Land Use	Rate	Size & Units	ADT	%	Split	AM		%	Split	PM	
						IN	OUT			IN	OUT
Residential - Single Family	10 /DU	83 DU	830	8%	0.3 0.7	20	46	10%	0.7 0.3	58	25

Source: SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002.

DU-Dwelling Unit; ADT-Average Daily Traffic; Split-percent inbound and outbound.

The project distribution of 50% to/from SR-76 and 50% to/from N. Santa Fe Ave is based on traffic engineering judgement and factors such as proximity to SR-76 and local productions and attractions.

Project Distribution and Assignment



As the project will generate less than 1,000 ADT and is consistent with the General Plan, a Local Transportation Assessment (LTA) would be required. The study area would include the project driveway at Guajome Lake Rd as this is the only location where more than 50 peak hour trips are added to the surrounding roadway network.

Guajome Lake Road (ADM21-00079) SANDAG VMT Map

