



TO: Nolan Weinberg, PMB  
FROM: Phuong Nguyen, TE, Senior Transportation Engineer; CR Associates  
DATE: November 10, 2022  
RE: Transportation Impact Threshold Comparison for the St. John Garabed Armenian Church EIR and VMT Screening Evaluation for the El Camino Real Assisted Living Facility Project

---

The purpose of this technical memorandum is to document the transportation impact thresholds analyzed in the St. John Garabed Church Environmental Impact Report (St. Garabed EIR) SCH#: 2013071043, current transportation impact thresholds, and potential transportation VMT impacts associated with the El Camino Real Assisted Living Facility Project (the “Project”) consistent with the City of San Diego Transportation Study Manual (TSM; 09/29/2020).

## Project Description

The Project is located at 13860 El Camino Real, south of the St. John Garabed Armenian Church (St. Garabed Church) project and east of Interstate 5, within Subarea II of the North City Future Urbanizing Area (NCFUA) of the City of San Diego. The Proposed Project intends to develop a 105,568 SF, three story 105-unit nursing home facility for assisted living consisting of 18 memory care accommodations and 87 assisted living accommodations.

The Proposed Project requires the following discretionary approvals:

- Conditional Use Permit (CUP) Amendment
- Site Development Permit (SDP) Amendment
- Neighborhood Use Permit (NUP)
- Uncodified CUP Ordinance
- Coastal Development Permit (CDP) Amendment
- Final Subsequent FEIR

Access to the project site will be provided via the right-in/right-out only driveway currently under construction by the adjacent St. John Church.

## CEQA Applicability

As part of the CEQA process, the City of San Diego as the “lead agency” has determined that the Project will require preparation of a Subsequent EIR (NOP date: December 15, 2021) to the St. Garabed EIR, which was approved by the City of San Diego in 2014 under SCH#: 2013071043. Since the adoption of the St. Garabed EIR, the City has adopted the Complete Communities: Housing Solutions and Mobility Choices (Complete Community EIR) (SCH #201906003), a Citywide programmatic EIR. The adoption of the Complete Communities EIR includes an update of the City’s California Environmental Quality Act (CEQA) Significance Determination Thresholds (December 2020) and the City’s Transportation Study Manual (TSM) consistent with the Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) published by Governor’s Office of Planning and Research (OPR) to transition to Vehicle Miles Traveled (VMT), in lieu of Level of Service (LOS), as the metric for determining transportation impacts.

The Governor’s Office of Planning and Research (OPR) advises that “an agency may use its discretion to determine that a VMT analysis is not required for later-prepared documents” tiering from an EIR analyzing transportation impacts using a level of service (LOS) metric. (<https://opr.ca.gov/ceqa/sb-743/faq.html#tier-env-doc>, citing *CREED v. San Diego* (2011) 196 Cal.App.4th 515; *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1320.) These cases provide that a change in the metric for analyzing a potential environmental impact under CEQA is not itself new information of substantial importance, where the impact could have been known at the time of certification of the underlying EIR. However, as OPR notes, CEQA and the CEQA Guidelines provide that “when tiering from an environmental document that used an LOS analysis, the [lead] agency should generally focus the analysis on impacts that were not analyzed as significant impacts in the prior document and impacts that can be mitigated or avoided by the project being analyzed.” (*Id.* citing Pub. Resources Code, § 21094; CEQA Guidelines, § 15152(d).) Accordingly, this analysis is provided for the purpose of analyzing the potential environmental impacts of the Project for the purpose of determining whether it has significant impacts that can be mitigated or avoided. Pursuant to CEQA section 21167.2, the transportation impacts considered in the St. Garabed EIR are not subject to further analysis except as to the changes proposed by the Project.

The Project is analyzed separately, using the most applicable thresholds at the time of the Notice of Preparation (NOP). The respective thresholds and their applicability to both the St. John Garabed Church project and the Project are discussed in the next section.

## Transportation Impact Analysis Threshold

Based upon review of the St. Garabed EIR, applicable CEQA guidelines (14 CCR § 15162), the City of San Diego Complete Communities EIR, and the City of San Diego TSM, a total of 10 topics are applicable in this analysis. Some of the topics that were applicable for the St. Garabed EIR, are no longer applicable for the Project, due to change in State law and precedent-setting court cases. Table 1 provides a side-by-side comparison of the applicable thresholds.

**Table 1 – CEQA Transportation Thresholds**

Threshold	Included in the St. Garabed EIR?	Included in Current Thresholds?
1. Would the proposal result in traffic generation in excess of specific community plan allocation?	Yes	No
2. Would the proposal result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system?	Yes	No
3. Would the proposal result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?	Yes	No
4. Would the proposal result in an increased demand for off-site parking?	Yes	No
5. Would the proposal result in effects on existing parking?	Yes	No
6. Would the proposal result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks or other open space areas?	Yes	No

Threshold	Included in the St. Garabed EIR?	Included in Current Thresholds?
7. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	Yes	Yes
8. Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?	No	Yes
9. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	Yes
10. Result in inadequate emergency access?	No	Yes

As shown, updated transportation impact thresholds apply to the Project. Analysis of each applicable threshold is provided below.

**Would the Project Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?**

An analysis of this issue is provided in Section 5.8.3.1 of the SEIR, which concludes no new significant alternative transportation impacts or substantial increases in a previously identified alternative transportation impacts analyzed and disclosed in the previously certified St. Garabed EIR would occur as a result of the Project.

**Would the Project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?**

At the time of approval of the St. Garabed EIR, VMT was not the recommended metric to determine its transportation impacts under CEQA. However, to demonstrate consistency with the St. Garabed EIR’s conclusion of less than significant transportation impacts under the new threshold, a VMT analysis was conducted for the Project and is provided as a part of the Project Information Form.

While SB-743 was signed into law on September 27, 2013, the implementing CEQA Guideline, 15063.4, effective December 28, 2018, set a deadline of July 1st, 2020, for jurisdictions to transition from using LOS to using VMT as a metric for determining transportation impacts. Since the St. Garabed EIR was certified on February 28, 2014, VMT was not a metric to determine transportation related impacts. However, VMT has been a metric available for environmental analyses of Greenhouse Gas impacts since at least the adoption of the 2008 AB 32 Scoping Plan<sup>1</sup> and the legislature specifically referenced VMT as a metric to measure transportation impacts for purposes of CEQA in SB 743, adopted (as noted above) on September 27, 2013. Accordingly, pursuant to the rule of *CREED v. San Diego* (2011) 196 Cal.App.4th 515 and *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1320, the change in the metric for analyzing a transportation impacts under CEQA is not itself new information of substantial importance, where the impact could have been known at the time of certification of the St. Garabed EIR in 2014 with the exercise of reasonable diligence. Therefore, the VMT related to the 2014 Church EIR is not new information of substantial importance for purposes of the SEIR. Consistent with this rule of law, City of San

Diego Information Bulletin 325 states, “If the proposed project, through a 15162 analysis, is able to tier from a certified EIR – such as a Community Plan Update, Specific Plan or prior project – which relied upon a LOS analysis to assess CEQA transportation impacts, a CEQA VMT analysis may not be required”.

This VMT Evaluation demonstrates the Project’s consistency with the transportation conclusions of the St. Garabed EIR.

### Project VMT

The Project VMT was analyzed based on the City of San Diego TSM, to answer the following CEQA transportation threshold question:

*Would the Project “Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?”*

The City of San Diego TSM provides screening criteria for projects that can be presumed to have a less than significant VMT impact due to project characteristics and/or location. The following screening criterion is applicable to the Project:

*Small Project: The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.”<sup>3</sup>*

Project trip generation was calculated to determine whether the Project would satisfy the small project screening criteria per the City of San Diego TSM. Trip generation rates were obtained from the City of San Diego’s Trip Generation Manual (May 2003).

As shown in Appendix H.1 to the SEIR, the Project would generate 234 daily trips. Therefore, the Project is presumed to have a less than significant VMT impact as it falls under the “Small Project” VMT Screening Criteria, and no additional analysis would be required.

Therefore, no new significant transportation impacts or substantial increases in a previously identified transportation impact analyzed and disclosed in the previously certified St. Garabed EIR would occur as a result of the Project.

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

An analysis of this issue is provided in Section 5.8.3.3 of the SEIR, which concludes impacts would be less than significant. No new significant transportation hazard impacts or substantial increases in a previously identified transportation hazard impact analyzed and disclosed in the previously certified St. Garabed EIR would occur as a result of the Project.

### **Would the Project result in inadequate emergency access?**

An analysis of this issue is provided in Section 5.8.3.4 of the SEIR, which concludes impacts would be less than significant. No new significant emergency access impacts or substantial increases in a previously identified emergency access impact analyzed and disclosed in the previously certified St. Garabed EIR would occur as a result of the Project.

## **Conclusion**

As shown above, because the change in the metric for evaluation of transportation impacts under CEQA is not new information of substantial importance for purposes of the



SEIR and the Project is presumed to have a less than significant VMT transportation impact under the City of San Diego TSM, no new significant transportation impacts or substantial increases in a previously identified transportation impact analyzed and disclosed in the previously certified St. Garabed EIR would occur as a result of the Project. The Project is consistent with the transportation conclusions from the St. Garabed EIR.