

4.13 TRANSPORTATION

This section of the EIR evaluates potential impacts on the transportation system resulting from implementation of the proposed project. The analysis is based, in part, on a Transportation Impact Analysis (TIA) prepared for the project (Kimley Horn 2020), which is included as Appendix N of this EIR.

4.13.1 Existing Conditions

The existing roadways, public transit network, bicycle network, and pedestrian network surrounding the project site are discussed below and shown in Figure 4.13-1, *Existing Transportation Network*.

4.13.1.1 Roadway Network

The principal roadways and highways in the project area are described briefly below.

70th Street

70th Street functions as a north-south major arterial that extends between University Avenue and Lake Murray Boulevard. Near the project site (between El Cajon Boulevard and Lake Murray Boulevard), 70th Street includes four vehicular lanes south of Alvarado Road and five lanes to the north over the I-8 freeway. 70th Street provides direct access to westbound I-8 and indirect access eastbound I-8 via Alvarado Road. The posted speed limit is 35 mph. On-street parking is permitted on both sides of the roadway south of Amherst Street. Sidewalks are provided on both sides of the road except for a few gaps between Saranac Street and I-8. Class II bicycle facilities are provided along both sides of the road except for the northbound side between Saranac Street and I-8.

Alvarado Road

Alvarado Road is an east-west, two-lane collector that extends between I-8 in La Mesa and College Avenue in the City of San Diego. The roadway generally parallels I-8 and functions as a frontage road to the freeway. Alvarado Road forms the northern boundary of the project site and provides access to the site. The posted speed limit for Alvarado Road is 35 mph. Within the project area (between I-8 eastbound ramp and Comanche Drive), on-street parking is provided along portions of the south side of the road, but no sidewalks or bicycle facilities are provided along the project frontage.

Fletcher Parkway

Fletcher Parkway is a six-lane major arterial that extends between I-8 in La Mesa to State Route 67 in El Cajon. Near the project site (between the I-8 westbound ramp and Baltimore Drive), Fletcher Parkway provides access to I-8 and to Alvarado Road. This segment does not have a posted speed limit and no on-street parking, sidewalks, or bicycle facilities are provided.

Guava Avenue

Guava Avenue is a two-lane collector that extends between Alvarado Road and La Mesa Boulevard in a north-south alignment. Near the project site (between Alvarado Road and El Cajon Boulevard), Guava Avenue provides access to I-8 via El Cajon Boulevard and to Alvarado Road. This segment has a posted speed limit of 25 mph. On-street parking is permitted along the northbound side of the road. Sidewalks are provided along portions of both sides of the roadway, but no bicycle facilities are provided.

El Cajon Boulevard

El Cajon Boulevard is a four-lane major arterial that extends through the cities of La Mesa and San Diego in an east-west alignment. Near the project site (between Guava Avenue and Baltimore Drive), El Cajon Boulevard provides direct access to I-8 east of Baltimore Drive and indirect access via 70th Street. The segment has a posted speed limit of 35 mph. On-street parking, Class II bicycle facilities, and sidewalks are provided along both sides of the roadway.

Interstate 8

I-8 is an east-west interstate highway that extends between Ocean Beach in the west and I-10 in Arizona. Within the project area, I-8 includes four general purpose lanes in each direction with interchanges at 70th Street/Lake Murray Drive and Fletcher Parkway.

4.13.1.2 Transit Network

The project site is located within a designated Transit Priority Area (TPA) and Smart Growth Area per the City of San Diego and SANDAG. TPAs include areas within one-half mile of major transit station or a station along a high-quality transit corridor. A major transit stop is a site that contains a rail transit stations, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes, each having a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods. Smart growth areas are locations that either contain existing smart growth development or allow planned smart growth in accordance with the identified land use targets and are accompanied by existing or planned transit service.

Existing public transportation within the project area consists of trolley and bus service provided by MTS. The major routes served in the immediate project area include the MTS Green Line Trolley and Bus Route 14. Both of these operate out of the adjacent 70th Street Trolley Station to the west. However, there are no existing pedestrian or bicycle connections to the Trolley Station from the project site.

The Green Line Trolley runs from Santee to Downtown San Diego, through Downtown San Diego, Old Town, Mission Valley, and El Cajon to Santee. There are 27 stops along this route one of which is at the adjacent 70th Street Trolley Station. This line runs on weekdays and weekends departing at 5:03 am and ends around 12:30 am with 15-minute headways. The project site is located directly north of the Green Line Trolley corridor.

Bus Route 14 runs from the Grantville Trolley Station to the Baltimore Drive and Lake Murray Boulevard bus stop. The route runs along Friars Road, College Avenue, Montezuma Road, 70th Street, and Lake Murray Boulevard, and stops at the 70th Street Trolley Station. This route runs on weekdays departing at 6:25 am with 60-minute headways. Weekend service is not provided.

4.13.1.3 Bicycle Facilities

The existing bicycle network within the project area includes Class II bike lanes and Class III bike routes along local roadways. Class II bike lanes provide a striped lane designated for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited. Bike lanes are one-way facilities located on either side of a roadway. Additional enhancements such as painted buffers and signage may be applied. Class II facilities are currently present along the following roadways within the project area:

- 70th Street: along the southbound side between Alvarado Road and University Avenue, and along the northbound side between Saranac Street and University Avenue.
- Lake Murray Boulevard: along the southbound and northbound sides from approximately 1,000 feet north of I-8 to the City limits near Flume Road.
- Fletcher Parkway: along both sides of the road from Baltimore Avenue to the City limits approximately 1,000 feet north of Dallas Street.
- Baltimore Drive: along the southbound side between El Cajon Boulevard to Fletcher Parkway and between Lake Murray Boulevard and the City limits at Blue Lake Drive, and along the northbound side between El Cajon Boulevard and the City limits at Blue Lake Drive.
- El Cajon Boulevard: along both sides of the road between Baltimore Drive and 73rd Street.

Class III bike routes provide shared use of traffic lanes with cyclists and motor vehicles, identified by signage and/or street markings such as “sharrows.” Bike routes are best suited for low-speed, low-volume roadways with an outside lane of 14 feet or greater. Bike routes provide network continuity or designate preferred routes through corridors with high demand. Existing Class III facilities in the project area provided along both sides of El Cajon Boulevard between 73rd Street and 70th Street.

No bicycle facilities currently exist along Alvarado Road.

4.13.1.4 Pedestrian Facilities

Existing pedestrian facilities within the project area consist of sidewalks and crosswalks along local roadways. Along some project area roadways, sidewalks are contiguous on one or both sides, but others have gaps. No sidewalks are provided along either side of Alvarado Road between 70th Street and the project frontage. Just east of the project site, contiguous sidewalks are provided along the eastbound side of the road to Guava Avenue. Alvarado Road serves as the only access road to the project site and currently, there are no pedestrian facilities that provide access to the project site.

4.13.2 Regulatory Setting

4.13.2.1 State

Senate Bill 743

SB 743, which was codified in PRC Section 21099 on September 27, 2013, required changes to the guidelines implementing CEQA regarding the analysis of transportation impacts. Specifically, SB 743 required the California Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of GHG emissions, the development of multi-modal transportation networks, and a diversity of land uses. To that end, OPR published its *Technical Advisory on Evaluating Transportation Impacts in CEQA* in December 2018, and the California Natural Resources Agency has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project’s transportation impacts. With the California Natural Resources Agency’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, are no longer the basis for determining a significant

environmental effect under CEQA. The City is using the OPR guidance for conducting transportation impact analyses.

4.13.2.2 Local

San Diego Forward: The Regional Plan

The Regional Plan (SANDAG 2015) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The underlying purpose of the Regional Plan is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout San Diego County as stipulated under SB 375. The Regional Plan establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The Regional Plan encourages an increase in residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation. General urban form goals, policies, and objectives are summarized as follows:

- Mix compatible uses.
- Take advantage of compact building design.
- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, natural beauty, and critical environmental areas.
- Strengthen and direct development towards existing communities.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost-effective.
- Encourage community and stakeholder collaboration in development decisions.

The Regional Plan also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

On February 22, 2019, the SANDAG Board of Directors approved an action plan to develop a new vision for the 2021 Regional Plan that would transform the way people and goods move throughout the region. Development of the 2021 Regional Plan, including the associated projects, programs, and policies, is underway and going through the planning process with an anticipated adoption by late 2021. While work progresses to develop this new vision, SANDAG prepared and adopted a 2019 Federal Regional Transportation Plan (2019 Federal RTP; SANDAG 2019b) that complies with federal requirements for the development of regional transportation plans, retains air quality conformity approval from the U.S. Department of Transportation, and preserves funding for the region's

transportation investments. The 2019 Federal RTP builds on The 2015 Regional Plan with updated project costs and revenues and a new regional growth forecast.

City of La Mesa General Plan

The Circulation Element of the adopted La Mesa General Plan outlines circulation goals, policies, and objectives related to streets and highways, scenic highways, public transit (trolley lines, bus, and paratransit), non-motorized transportation (bicycle facilities and pedestrian circulation), and regional transportation. The Circulation Element establishes a system for the classifying streets according to their intended function and identifies standards for the required elements (e.g., number of lanes, parking lanes, sidewalks, medians, bicycle lanes) of each functional classification. The following goals, objectives, and policies from the Circulation Element are relevant to the project:

Goal CE-1: A comprehensive, flexible transportation system that is functional, safe, accessible and attractive.

- **Objective CE-1.1:** Enhance and maintain City streets to meet the diverse needs of the community.
- **Policy CE-1.1.3:** Require new developments to provide for on- and off-street improvements directly related to the project, found to be needed to meet the City’s policies regarding street function, design, and safety and that advance the City’s “Complete Streets” objectives.

Goal CE-3: A diverse transit system offering a safe, time-efficient, and cost-effective transportation choice that reduces traffic congestion and improves air quality.

- **Objective CE-3.1:** Maximize the utility of La Mesa’s transit services.
- **Policy CE-3.1.5:** Develop and apply Design Standards applicable to future developments that improve access to public transit.

Goal CE-4: Local and regional facilities that accommodate the unique needs of bicycle travelers.

- **Objective CE-4.2:** Improve safety for bicyclists and motorists alike.
- **Policy CE-4.2.1:** Design bicycle facilities in accordance with Caltrans design criteria.

Goal CE-5: Provide opportunities that encourage safe pedestrian travel.

- **Objective CE-5.1:** Improve the pedestrian network and walkability in La Mesa.
- **Policy CE-5.1.3:** Within a quarter mile of transit services, the needs of pedestrians will be a priority for future capital investment.

City of La Mesa Bicycle Facilities and Alternative Transportation Plan

The Bicycle Facilities and Alternative Transportation Plan (City 2012c) provides a framework for the future development of the City’s bicycle network and also makes the City eligible for local, state, and

federal funding for bicycle and pedestrian projects. The plan objectives are to address the following issues as identified through discussions with City staff and the public:

- Provide a comprehensive bikeway system that provides a network of facilities serving destinations throughout the City.
- Place importance on sidewalk continuity and pedestrian safety during transportation facility improvements.
- Provide more programs to educate residents about the health benefits of cycling and walking.
- Provide enforcement and education of both motorists and cyclists to improve safety and awareness throughout the City.
- Develop a Complete Streets framework that encourages all modes of transportation and reduces traffic congestion, increases alternative transportation options and connectivity, and improves public health and safety.

The planned system builds upon existing bicycle and pedestrian facilities throughout the City with enhancements to overall connectivity, support facilities, safety and education programs. Coupled with bicycle and pedestrian education, as well as enforcement and promotional programs, the anticipated result is an increase in the number of commuters choosing to ride a bicycle and walk to nearby destinations.

4.13.3 Methodology and Assumptions

The VMT analysis conducted for the project was based on the OPR Technical Advisory. The Technical Advisory provides agencies with recommendations on screening thresholds, VMT analysis methodologies, project VMT thresholds, and mitigation strategies.

Screening thresholds are used to identify projects that are anticipated to result in less than significant transportation impacts without requiring a detailed transportation study. OPR recommends agencies develop thresholds to screen out projects based on project size, maps, transit availability, and provision of affordable housing. If a project meets any of the following screening thresholds, it is assumed to result in less than significant impacts related to VMT and a detailed transportation study is not required. The four screening thresholds are identified below:

- Project size: projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact.
- Screening maps: maps created with VMT data can illustrate areas that are currently below threshold VMT and would likely result in similar levels of VMT with new development can be used to screen residential and office projects.
- Proximity to transit: certain projects (residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within one half mile of an existing major transit stop or an existing stop along a high-quality transit corridor would result in a less than significant impact on VMT.

- **Affordable Residential Development:** A 100-percent affordable residential development (or the residential component of a mixed-use development) in infill locations may be presumed to result in a less than significant transportation impact.

The OPR Technical Advisory provides suggested methodologies to analyze VMT associated with a project. For residential and office projects, tour- and trip-based¹ approaches are recommended for assessing project VMT and comparing to the VMT thresholds. The OPR Technical Advisory also provides recommended numeric VMT thresholds for residential, office, and retail land projects. The methodology consists of calculating the VMT per capita and comparing it to the citywide or regionwide VMT per capita. If the ratios for the residential project exceed 85 percent of the city or regional average, a significant transportation impact would occur. This methodology was used for the proposed project's VMT analysis (Kimley Horn 2020). VMT for the project was estimated using the Series 13 regional SANDAG model under 2035 Horizon Year conditions for TAZ 3168 where the project site is located. Additionally, the SANDAG Mobility Management VMT Reduction Calculator Tool was used to assess VMT reductions for the project.

4.13.4 Significance Thresholds

According to Appendix G of the CEQA Guidelines, a significant impact associated with transportation would occur if implementation of the proposed project would result in any of the following:

1. Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
2. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
3. 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)?
4. Would the project result in inadequate emergency access?

4.13.5 Impact Analysis

4.13.5.1 Transportation Plans

Threshold 1: Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The proposed project would be consistent with applicable transportation plans, including San Diego Forward: The Regional Plan, the Circulation Element of the General Plan, and the City of La Mesa Bicycle Facilities and Alternative Transportation Plan, as discussed below.

¹ Trip-based assessment of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally the most common, method of counting VMT. A tour-based assessment counts the entire home-back-to-home tour that includes the project.

San Diego Forward: The Regional Plan

The proposed project would be consistent with the overarching principles of the Regional Plan of increasing residential concentrations in areas served by transit and implementation of smart growth designed to strengthen the integration of land use and transportation. The project site is identified as a smart growth area on SANDAG's Smart Growth Concept Map (SANDAG 2016a) that includes the area surrounding the 70th Street Trolley Station. This smart growth area, identified as site LM-10, is designated a Community Center Smart Growth place type and described as "potential exists for a transit-oriented, mixed-use development located adjacent to the 70th Street Trolley Station" (SANDAG 2016b). Each smart growth place type is associated with certain housing and employment density targets and transit service thresholds and can qualify as either "Existing/Planned" or "Potential," depending upon whether it meets the thresholds included by reference in the Regional Plan. The minimum land use and transit targets for a Community Center include a minimum residential target of 20 dwelling units per acre and minimum transit service characteristics of high-frequency local bus or streetcar/shuttle within an urban area transit strategy boundary. Site LM-10 is designated an Existing/Planned smart growth area, which is a location that either contains existing smart growth development or allows planned smart growth in accordance with the identified land use targets and are accompanied by existing or planned transit services included in The Regional Plan. The proposed project would be consistent with both the land use target and transit characteristics.

The project would be consistent with other Regional Plan goals and strategies of increasing transportation mode choices and reducing reliance on the single-occupancy automobile. Currently, the project is well served by public transit, but the adjacent 70th Street Trolley Station is not easily accessible from the project site. Connections to the east and west of the project site are limited by lack of pedestrian infrastructure. The project would provide an accessible route for resident and public access the adjacent 70th Street Trolley Station by walking or biking via a shared-use path along the south side of the Alvarado Road. The shared-use path would continue from the project site to the east along Alvarado Road and connect to the existing sidewalk on Comanche Drive for access to other neighborhoods and destinations. The proposed shared-use path would also connect to planned future bicycle facilities along Alvarado Road. Provision of these multi-modal facilities would improve access to and from a major transit station for pedestrians and bicyclists and would provide project residents alternatives to single occupancy vehicular transportation. The potential for the project to incorporate a student housing component within the mix of residential units would likely reduce the number of single-occupancy vehicle trips to and from the site. Therefore, the proposed project would be consistent with the goals and strategies of the Regional Plan.

General Plan Circulation Element

The proposed project would be consistent with the relevant goals, objectives, and policies of the Circulation Element identified in Section 4.13.2.2. The project would construct a TOD that would provide direct connections to the adjacent 70th Street Trolley Station, as well as roadway, bicycle, and pedestrian improvements along Alvarado Road. Improvements are proposed to Alvarado Road along the project site frontage include road right of-way dedication and a public access easement to provide for a shoulder, parking lane, curb and gutter, a Class I shared pedestrian/bicycle path, pedestrian bridge over Alvarado Creek, and street-side landscaping. On-site access roads and pedestrian facilities would also be provided, including two internal access roads that would loop around the building perimeters, a pedestrian promenade along Alvarado Creek, and several other pedestrian paths connecting on-site areas.

These improvements would be consistent with Policy CE-1.13 (Require new developments to provide for on- and off-street improvements directly related to the project, found to be needed to meet the City's policies regarding street function, design, and safety and that advance the City's "Complete Streets" objectives), Policy CE-3.1.5 (Develop and apply Design Standards applicable to future developments that improve access to public transit), Objective CE-4.2 (Improve safety for bicyclists and motorists alike), Goal CE-5 (Provide opportunities that encourage safe pedestrian travel), and Objective CE-5.1 (Improve the pedestrian network and walkability in La Mesa). Therefore, the proposed project would be consistent with the Circulation Element.

Bicycle Facilities and Alternative Transportation Plan

The project would include bicycle facilities that would not conflict with those identified in the Bicycle Facilities and Alternative Transportation Plan (City 2012c). This plan identifies provision of Class II bike lanes along Alvarado Road between 70th Street and Guava Avenue. The project proposes a Class I facility along the south side of Alvarado Road along the project frontage that would connect to planned future bicycle facilities along Alvarado Road to the east and west. Provision of a Class I facility along the south side of Alvarado Road would provide more protection for bicyclists than Class II facilities and is a more practical facility for this site for access between the project site and the adjacent 70th Street Trolley Station, as westbound bicyclists would not have to cross Alvarado Road. Thus, while the project would provide a different type of bicycle facility along a portion of Alvarado Road than identified in the Bicycle Facilities and Alternative Transportation Plan, it would provide a separated bikeway that would accommodate both bicycle and pedestrians.

The project would be a TOD and would include improvements to bicycle and pedestrian facilities, encouraging the use of alternative transportation. The La Mesa General Plan Circulation Element proposes Class II bicycle lanes along Alvarado Road. The project would provide a shared-use path along the south side of Alvarado Road that will provide more protection for bicyclists than Class II bicycle lanes. The project would also connect to the Class II bike lanes that are proposed to be installed to the east of the project site. Therefore, the project would be developed in accordance with the City's Bicycle Facilities and Alternative Transportation Plan and the City's General Plan. The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant.

4.13.5.2 Vehicle Miles Traveled

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines section 15064.3 describes specific considerations for evaluating a project's transportation impacts and states that generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. As discussed in Section 4.13.4, the project VMT analysis was conducted using the methodologies and thresholds contained in the OPR Technical Advisory.

VMT Screening

Per the OPR Technical Advisory screening thresholds, a project located within one half mile of an existing major transit stop or along a high-quality transit corridor is presumed to have a less than significant impact on VMT. A major transit stop is defined as a site containing an existing rail transit

station, a ferry terminal 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. The project site is located adjacent to the 70th Street Trolley Station, which meets the definition of a major transit stop since it contains an existing rail station. The project therefore meets the VMT screening thresholds for land use projects due to the project site's proximity to a major transit stop. Thus, the proposed project may be presumed to have a less than significant impact on VMT and no detailed VMT analysis is required.

VMT Analysis

Although not required per the VMT screening threshold for proximity to transit, a VMT analysis was conducted for the project to determine whether it would exceed VMT thresholds. The VMT analysis was based on a Series 13 regional SANDAG model under 2035 Horizon Year conditions. The results of the analysis are shown in Table 4.13-1, *2035 Regionwide, Citywide, and Project VMT Per Resident*.

Table 4.13-1
2035 REGIONWIDE, CITYWIDE, AND PROJECT VMT PER RESIDENT

Scenario	Residents	Total Trips	VMT	VMT per Capita
Regionwide	3,855,696	13,756,249	58,989,617	15.3
City of La Mesa	72,248	264,684	1,011,045	14.0
Proposed Project	2,112	7,766	28,418	13.5

Source: Kimley-Horn 2020

VMT = vehicle miles traveled

The VMT per capita resulting from the proposed project is 13.5 miles, which is 88 percent of the regional average of 15.3 miles and above the threshold of 85 percent for residential projects.

VMT Reductions

The proposed project includes various transportation demand management strategies and multi-modal improvements that would be incorporated into the project as design features that are covered in the SANDAG Mobility Management VMT Reduction Calculator Tool. These VMT reduction features include construction of a TOD and provision of pedestrian and bicycle facility improvements.

As stated in the SANDAG VMT Reduction Calculator Tool, "TOD refers to projects built in compact walkable areas that have easy access to public transit" and are "places within a 10-minute walk of high-frequency rail transit station (e.g. SPRINTER, COASTER, Trolley)." The project would fulfill this requirement because the project is within one half mile of a rail transit station and would provide pedestrian and bicycle access to the 70th Street Trolley Station. This design feature would reduce the project's VMT per capita by 5.2 percent. Additionally, the project would include improvements to pedestrian and bicycle facilities. A shared-use path would be provided along the south side of Alvarado Road, providing an accessible walkway for residents to access the 70th Street Trolley Station by walking or biking. The shared-use path would continue to the east side of the project site, with a bridge structure over the creek, connecting to the City-planned bicycle facilities east of the project. Per the SANDAG VMT Reduction Calculator Tool, such improvements would reduce the project's VMT per capita by 1.5 percent. Incorporation of the project features listed above would reduce the project's VMT per capita to approximately 81 percent of the regionwide VMT per capita, which is below 85 percent of the

regional average. Therefore, the project would not conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Transportation impacts related to VMT would be less than significant.

4.13.5.3 Transportation Design Hazards

Threshold 3: 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)?

There would be no hazardous design features or incompatible uses introduced as a result of the project. The project would involve improvements to Alvarado Road along the project site frontage, including road right-of-way dedication and a public access easement to provide for a shoulder, parking lane, curb and gutter, a pedestrian bridge over Alvarado Creek, a shared pedestrian/bicycle path, and street-side landscaping. The shared-use path along the south side of the Alvarado Road project frontage would be constructed as a Class I facility, which would provide a buffered facility dedicated for bicyclists and pedestrians, where none currently exist.

On-site access roads and pedestrian facilities would also be provided, including two internal access roads that would loop around the building perimeters, a pedestrian promenade along Alvarado Creek, and several other pedestrian paths connecting on-site areas. The internal streets would provide ingress and egress for residents to the parking structures, guest parking spaces near the project entry points, access and circular routes for service vehicles, and emergency vehicle access and dedicated fire lanes. The design of these improvements would be required to conform with applicable federal, State, and City design criteria which contain provisions to minimize transportation hazards.

Additionally, the project site access points along Alvarado Road would be designed in accordance with City standards to consider adequate sight distances for both directions. These transportation improvements are intended to improve safety for motorists, bicyclists, and pedestrians on the roadway.

The proposed residential and resident-serving commercial uses are not anticipated to generate the types of traffic that would be incompatible with the existing transportation network or composition of traffic. Traffic generated by the project would include standard automobiles, bicycle, and pedestrian traffic, which would be consistent with the existing traffic in the area.

Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts related to transportation design hazards would be less than significant.

4.13.5.4 Emergency Access

Threshold 4: Would the project result in inadequate emergency access?

During construction of the project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). Additionally, construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along Alvarado Road for a period of time within the construction zone. Emergency access to all surrounding properties, however, would be maintained throughout the construction period. As a result, the project's construction-related impacts would be less than significant.

The project would construct improvements to Alvarado Road along the project site frontage, including road right of-way dedication and a public access easement to provide for a shoulder, parking lane, curb and gutter, a shared pedestrian/bicycle path, pedestrian bridge over Alvarado Creek, and street-side landscaping. Additionally, the project site access points along Alvarado Road have been designed to provide for adequate site distances for both directions. These roadway improvements would provide improved circulation along the roadway, including for emergency vehicles.

The project would provide adequate emergency access within the site. Access for emergency vehicles would be provided along the proposed perimeter road. Fire lanes would also be provided on site to accommodate emergency response vehicles such that Alvarado Road would not be obstructed for public safety vehicle movement as well as local traffic both to the east and west in the event of an emergency. Therefore, the project would not result in inadequate emergency access. Impacts would be less than significant.

4.13.6 Mitigation Measures

4.13.6.1 Transportation Plans

No significant impacts associated with transportation plans would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

4.13.6.2 Vehicle Miles Traveled

No significant impacts associated with VMT would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

4.13.6.3 Transportation Design Hazards

No significant impacts associated with transportation design hazards would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

4.13.6.4 Emergency Access

No significant impacts associated with emergency access would result from the implementation of the proposed project. Therefore, no mitigation measures are required.

4.13.7 Significance Determination

The significance of impacts to transportation before and after mitigation is summarized in Table 4.13-2, *Significance Determination Summary of Transportation Impacts*. Implementation of the proposed project would not result in significant impacts related to transportation plans, VMT guidelines, transportation design hazards, or emergency access. Therefore, impacts related to transportation would be less than significant without mitigation.

Table 4.13-2
SIGNIFICANCE DETERMINATION SUMMARY OF TRANSPORTATION IMPACTS

Issue	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
Transportation Plans	Less than significant	None required	Less than significant
VMT	Less than significant	None required	Less than significant
Transportation Design Hazards	Less than significant	None required	Less than significant
Emergency Access	Less than significant	None required	Less than significant

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