February 4, 2021

Everett DeLano
DELANO & DELANO
104 W. Grand Ave., Suite A
Escondido, CA 92025

Subject: Trails at Carmel Mountain Ranch General Plan/Community Plan Amendment DEIR (Draft Environmental Impact Report) Transportation Review

Dear Mr. DeLano,

Introduction

RK ENGINEERING GROUP INC. (RK) has reviewed the Trails at Carmel Mountain Ranch General Plan/Community Plan Amendment DEIR with respect to transportation impacts to the adjoining community. The project proposes a general plan/community plan amendment to redevelop from a private recreation golf course to low – medium density residential, medium density residential, open space and other open space in the Carmel Mountain Ranch Community Plan. RK has reviewed the DEIR dated December 2020, the VMT (Vehicle Miles Traveled) Analysis dated November 13, 2020 and the Local Mobility Analysis, dated December 18, 2020, both prepared by Fehr and Peers.

The project proposes to redevelop the existing 18-hole golf course with 1,200 multifamily residential units and a mix of open space and recreation areas. More specifically, the project would include 451 townhomes, 629 market rate apartments, and 120 affordable apartments. The project also proposes a future development of approximately 6,000 square feet of community commercial amenities that would include an art studio, a café/restaurant/banquet area with kitchen and a caretaker unit. The project is a major infill project within the previous Carmel Mountain Ranch Golf course which has not been operating for some time. The project will generate a substantial amount of new traffic which would include 8,282 daily trips with 657 vehicles per hour during the AM peak hour and 772 vehicles per hour during the PM peak hour. This will generate hundreds of thousands of additional vehicle miles traveled per day from an area that already generates significantly over the regional average of VMT/Capita.

RK has conducted a review of the DEIR and its appendices with respect to transportation and the VMT (Vehicle Miles Traveled) impacts to the adjoining Carmel Mountain Ranch

Community. Based upon our review, there are a significant number of unmitigated impacts created by the project that will impact the Carmel Mountain Ranch Community and the region as a whole. It is recognized in the DEIR that the project will have a Significant and Unavoidable impact to the area since the residential component of the project will generate 21.4 to 23.2 VMT/Capita, whereas the City requirement is to achieve 15% below the regional average of 19.0 VMT/Capita. This conclusion is based upon the City's VMT/Capita Screening Maps. However, the City's Transportation Study Manual (TSM) requires projects of this size to use the SANDAG model to determine the actual VMT/Capita for the proposed project.

A number of proposed mitigation measures are recommended; however, they are mostly bicycle related improvements which may not actually reduce a significant amount of automobile related travel. In fact, the DEIR recognizes that "The Project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned bicycle facilities". Therefore, it is not anticipated that the recommended mitigation measures would significantly change the findings of the DEIR that a Significant and Unavoidable impact will be caused by the VMT generated by the project. If any part of the proposed project is approved, substantially more improvements/mitigation measures would be needed as included in Appendix T of the City's *Mobility Choices Regulations* to help reduce the VMT Impacts of the project.

There are several concerns with the Local Mobility Analysis for the project. The project will generate a total of 8,282 daily trips of which the residential component will generate 7,928 daily trips. This is a substantial increase in traffic within the community that will affect both the arterial highway system and local streets. The project will contribute substantially to additional queuing at the intersection of Ted Williams Parkway at Shoal Creek Drive which would normally require dual left turn lanes on Ted Williams Parkway and widening of Shoal Creek Drive. No major road improvements have been recommended with the exception of some minor traffic signal upgrades and the possible addition of one traffic signal.

The project will have major impacts to two local streets including Carmel Ridge Road and Windcrest Lane. These locally designated streets in the *Carmel Mountain Ranch Community Plan* are projected to exceed their design capacity as local streets with the proposed project. No mitigation measures are designated for these two impact roadways. These streets were incorrectly analyzed as collector streets, yet they have direct driveway access by the existing single-family homes.

These comments and additional issues are identified in the comments section of this letter and need to be addressed before any further review or approval of the project is considered.

Comments

These Comments are related to the VMT Study:

1. VMT Analysis and Assessment. The VMT assessment indicated that the expected project VMT of 21.4 to 23.2 VMT/Capita was obtained from the City's VMT per Capita Maps and was not specifically calculated for the project. As noted in the DEIR it would be significantly above the VMT significance threshold of 16.2 VMT/Capita which is specified for the region. However, the DEIR specifically acknowledges that the City's Transportation Study Manual (TSM) requires project's, which aren't screened out, must have their VMT analyzed. The City's TSM states: "Transportation VMT analysis for CEQA shall (emphasis added) be conducted using the SANDAG Regional Travel Demand Model." It explains: "Table 4 provides guidance on conducting transportation VMT analysis for CEQA based on the land use." *Id*. Table 4 of the TSM describes the required analysis methodology for residential projects, such as this project, which will generate greater than 2,400 daily trips. It requires: "For projects that generate greater than 2,400 daily unadjusted driveway trips: (emphasis added) that the project must be inputted into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's VMT per Capita. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG VMT per Capita maps."

   The DEIR relies on census tract information and acknowledges it didn't run the required analysis, but instead infers that the Project will not get under the threshold. The specific VMT generated should be determined. It may be less than the census tract data, but it also could be significantly higher given the density of this Project. The full SANDAG Regional Traffic Modelling needs to be completed for the VMT evaluation to be accurate for this specific project.

2. The DEIR included a number of mitigation measures as suggested by the *San Diego Land Development Manual, Appendix T.* However, most of those measures are geared to the use of bicycle improvements and it is concluded in the DEIR that even with these mitigation measures the project will continue to have Significant and Unavoidable VMT impacts to the area and the region. The DEIR states that "The Project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned bicycle facilities". Therefore, it is not anticipated that the recommended mitigation measures would significantly change the findings of the DEIR that a Significant and Unavoidable impact will be caused by the project. If the project is to be considered at all, a much larger array of the VMT reduction measures as included in *Appendix T* of the City's *Land Development Manual* will need to be provided by the project.

3. Even with mitigation measures, the 7,928 total daily trips generated by the residential component of the project will result in a substantial increase in overall total VMT produced in the area. The 1,200 dwelling units will increase overall daily VMT by at least 169,659 VMT per day. That is a substantial increase for the entire Carmel Mountain Ranch Community and no substantial mitigation has been included in the DEIR.

These Comments are related to the Local Mobility Analysis

4. According to the Local Mobility Analysis (Traffic Impact Study,) the project is not anticipated to increase bicycle demand, so additional upgrades to existing or planned bicycle facilities are recommended. Yet as noted in Comment #2 above, all of the mitigation measures suggested for the VMT exceedances were based upon bicycle improvements which will have little impact to reducing traffic from the proposed project. Limited, if any additional traffic related improvements are provided by the project.

5. Table 4, Page 27: This table classifies Carmel Ridge Road as a collector road, whereas, it is designated as a local street in the *Carmel Mountain Ranch Community Plan* with a design capacity of 2,200 ADT. Windcrest Lane from Seabridge Lane to Shoal Creek Drive is also classified as a local street with the design capacity of 2,200 ADT. These two local street segments are significantly impacted by the project traffic and forecast to exceed their design capacity. These local streets have direct residential access (driveways) and no mitigation measures are recommended for any of these impact streets for Year 2025 and Year 2050 conditions with the project.

6. Figure 6B: This figure indicates the project will be contributing significantly greater traffic (over 50 peak hour trips) and 1,268 ADT to State Route 56. *Why was there no analysis of the impacts to this important State Route for future conditions (Year 2025 and Year 2050) as a result of the project's expected traffic?*

7. Page 34, Opening Year Traffic: *Why was no ambient growth rate applied to existing traffic for the Opening Year (2025) traffic projections?* It appears that only the 11 cumulative projects were added to existing traffic volumes for project baseline Year 2025 conditions. Typically, an ambient growth rate of at least 1% per year depending on the regional rate of growth should also be added to the existing traffic volumes to determine the Opening Year traffic.

8. Page 39, Opening Year (2025) Intersection and Roadway Operations: Three intersections will require either traffic signal upgrades or a new traffic signal. Will the City be making these improvements required for any potential approval of the project and would they be a developer responsibility?

9. Pages 44-45, Table 9, Opening Year (2025) Roadway Level of Service: Windcrest Lane and Carmel Ridge Road are projected to have traffic volumes that are over their roadway design capacity of 2,200 for Year 2025 conditions with the project. Carmel Ridge Road is shown as a collector road in the Local Mobility Analysis which is incorrect according to the *Carmel Mountain Ranch Community Plan*. Both of these local streets are projected to exceed their design capacity and would have significantly more traffic than desirable for a local residential street. The project's driveway access locations and number of residential units served appears to directly contribute to these conditions and are unmitigated. Elimination of the project traffic causing these conditions needs to be considered or other appropriate mitigation measures need to be provided by the project.

10. Page 47, Table 11, Opening Year (2025) Intersection Queuing Analysis: The intersection of Ted Williams Parkway at Shoal Creek Drive eastbound left-turn substantially exceeds the capacity of the existing storage lane of 230-feet. This is a significant impact since the queue length for Year 2025 increases from 292-feet to 631-feet in length, and yet, there is only 230-feet of storage provided at this intersection. This amount of traffic would definitely warrant a dual left turn lane which would require modifications to both Ted Williams Parkway and Shoal Creek Drive. The DEIR indicates that this could be accommodated by lengthening the storage lane, but there is no analysis provided to prove this will work. Re-timing the intersection would affect the other movements at this intersection and cause additional delay to the other approaches.

11. Page 49 Table 12, ADT Forecast by Intersection Leg: Please clarify why the column titled "Existing ADT" does not match the ADT volumes included in Figure 5, Page 23 of the traffic counts in the Appendix of the report. It's not clear why there are different ADT values shown in this table as opposed to both Figure 5 and the traffic counts included in Appendix B. Also, it appears that the Annual Growth Factor may be incorrectly calculated in several cases for Intersections 15 through 27 and others starting with Intersection #1. These calculations need to be re-checked for accuracy.

12. Page 56, Table 13, Horizon Year (2050) Intersection Level of Service: In several cases, it appears that the delay for Existing conditions is greater than the Year 2050 delay at the several intersections, even though traffic volumes have increased substantially at those locations. Some of the examples of this include Intersection #2 during the PM peak hour, Intersection #13 during the AM and PM peak hours, and Intersection #16 during the AM and PM peak hours. Some explanation is needed on why the traffic delay is reduced so substantially in the future, when traffic is projected in 30 years in the future and traffic from the proposed project is added to the future Year 2050 volumes. It is recognized that some changes of traffic movements may change the allocation of green-time to various movements,

but with the significant changes in future traffic volumes you would expect the overall delays to increase 30 years in the future.

13. Page 59-60, Table 14. Horizon Year (2050) Roadway Level of Service: Same comments as Comment #9 with respect to Windcrest Lane and Carmel Ridge Road. Carmel Ridge Road and a portion of Windcrest Lane are miss-classified as collector streets. The project causes the future daily traffic volumes on these streets to substantially exceed the design capacity of a "local street" as defined by the *Carmel Mountain Ranch Community Plan*. Again, no mitigation has been recommended for these streets where there is direct residential frontage with driveway access and the project will contribute a substantial amount of new traffic.

14. Page 61, Horizon Year (2050) Intersection Queuing Analysis: Same comment as Comment #10. The intersection of Ted Williams Parkway at Shoal Creek Drive eastbound left turn volume substantially exceeds the capacity of the existing storage lane. This also occurs for Opening Year conditions. This is a significant impact, since the queue length for Year 2050 increases with the project from 288-feet to 656-feet, and yet, there is only 230-feet of storage provided at this intersection. This intersection would definitely warrant an eastbound dual left-turn lane which would require modifications to both Ted Williams Parkway and Shoal Creek Drive.

15. Page 77, Proposed Bicycle Improvements: This section again indicates "The project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned facilities". This is an odd conclusion, seeing that the proposed mitigation for the excessive VMT/Capita generated by the project is providing bicycle related mitigation measures and it would appear that the use of bicycles would substantially reduce the VMT generated by the project.

16. Page 87, Tables 24 and 25 (AM/PM) Transit Movement Delay: The analysis indicates that the project would have a significant impact upon the delay of transit vehicles at the intersection of Carmel Mountain Road at Camino Del Norte. However, no public transit improvements or amenities are recommended as part of the project. It would appear warranted given the impacts to the transit movement delays, and the need to reduce the project's VMT/Capita that the project needs to provide a significant amount of transit related improvements for the entire project.

17. Page 91, Internal Circulation: The project has significant impacts to Carmel Ridge Road and Windcrest Lane which have a direct residential frontage and are classified as local streets in the Carmel Mountain Ranch Community Plan. The project's access points located at Intersections #B, #E and #F directly feed into and contribute a significant amount of traffic to both of these local streets. As previously noted in Comments #9 and #13, the project is contributing a substantial additional daily traffic to these local streets which have direct single family residential driveways and

are local in nature traffic. The projected future volumes with the project increase substantially and exceed the design capacity of these local streets at 2,200 ADT.

Conclusions

RK recommends that the comments presented in this letter be responded to and addressed as part of the CEQA process. There are a number of findings from this review that would directly affect the proposed project and it should not proceed without addressing and resolving these transportation issues. Significantly more mitigation is necessary to adequately address the VMT issues that have been discussed in this letter. As noted in the DEIR, the project will have a Significant and Unavoidable Impact with respect to VMT that has not been mitigated. More significant transportation mitigation measures and/or reductions in the number of residential units are needed beyond what has been suggested in the DEIR for the project to move forward.

As noted in our comments, there are several traffic impacts that need to be addressed as part of the Local Mobility Analysis. These include several of the technical issues that have been raised in Comments #4 – 17, noted above. A significant concern has been raised as to the project's impacts to Carmel Ridge Road and Windcrest Lane as local streets that will be adversely impacted by the project's traffic. Solutions to these concerns need to be properly addressed for the project to move forward.

RK Engineering Group, Inc. appreciates the opportunity to work with Delano and Delano in reviewing the Trails at Carmel Mountain Ranch project. If you have any questions please call me at (949) 293-9639.

Sincerely,
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Founding Principal

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