

July 29, 2022

To: Carlsbad Tomorrow Committee

From: Committee Member Steve Linke (Traffic & Mobility Commission)

I am concerned that the presentations on Mobility/Circulation last evening may have created some confusion about the types of performance standards that can be implemented. There was a lot of unavoidable, but potentially confusing, transportation engineering jargon and acronyms.

My main concern was the repeated statement that “vehicle miles traveled” (VMT) must now be used instead of “level of service” (LOS) as the performance standard under the “California Environmental Quality Act” (CEQA). While that statement is technically true, it is not really relevant to our committee’s work on growth management. As I explained last evening, the development project review process simultaneously follows two paths, which can be pictured as follows:

Agency	State of California	City of Carlsbad
Impact addressed	Environment (GHGs)	Street infrastructure
Governing code	CEQA	GMP
Travel mode(s)	Vehicles	All
Required study	EIR	LMA
Method	VMT	LOS

The **State** requires certain proposed projects to review the **environmental** impact of vehicle trips (greenhouse gas emissions) under its **CEQA** law with a document called an “environmental impact report” (**EIR**).<sup>1</sup> The EIR must include a study that estimates how many **VMT** will be generated by the project. If VMT is determined to be over a certain CEQA threshold, then the project can be compelled to pay for mitigation strategies to reduce its VMT by reducing vehicle trips or length.

At the same time, **Carlsbad** requires review of **street infrastructure** impacts in the vicinity of the proposed project (e.g., vehicle congestion and pedestrian, bicycle, and/or transit facility needs) under its “Growth Management Plan” **GMP** code with a document called a “local mobility analysis” (**LMA**).<sup>2</sup> The LMA should include analyses of **LOS** for **all modes** of travel prioritized on the adjacent streets. If LOS is worse than the “D” GMP performance standard for any prioritized mode, then the project should pay for improvements such as road widening, intersection improvements, sidewalks, bike lanes, transit amenities, and or vehicle trip/length reduction approaches.

Conveniently, many of the mitigation strategies for both paths are shared, and the State requirement could take care of the environmental side of things, while the City requirements could cover the quality of life side. Projects that have significant impacts on just one path could have lower mitigation requirements, while those that have significant impacts on both paths could have higher mitigation

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<sup>1</sup> Note that some projects use a Negative Declaration or Mitigated Negative Declaration (MND) instead of an EIR.

<sup>2</sup> Note that some jurisdictions call this a Local Transportation Analysis (LTA), Transportation Impact Analysis (TIA), or Traffic Impact Study (TIS).

requirements. Unfortunately, from my perspective, this is not the reality in Carlsbad, which minimizes mitigation requirements by developers.

Also note that, in Carlsbad, the proportion of projects required to do EIRs is small, and the proportion found to have significant VMT impacts is tiny, so adopting VMT as Carlsbad's GMP performance standard would ensure that nearly no infrastructure projects would get funded under the GMP.

Finally, please note that the San Diego Section of the Institute of Transportation Engineers recommends, and all major San Diego County jurisdictions use, this dual review approach. As an example, here is the [City of San Diego's Transportation Study Manual](#) flow chart. The State CEQA/EIR/VMT path is on the left, and the City/LMA/LOS path is on the right.

