

August 24, 2022

To: Carlsbad Tomorrow Committee

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

Re: GMP circulation performance standards

This first page describes a flow diagram on the second page, intended to help simplify and visualize three parallel/complementary pathways of traffic impact analysis. These pathways apply to development reviews and the city's annual Growth Management Plan (GMP) monitoring, consistent with the GMP and General Plan Mobility Element. The third page contains my initial recommendations for committee consideration.

State of California environmental impact assessment (VMT)

On the left of the flow diagram is the State's **Environmental** pathway, which is intended to reduce greenhouse gas (GHG) emissions. A "vehicle miles traveled" (VMT) method is used for this pathway. If a project's calculated VMT exceeds a certain threshold, the developer is supposed to create a Transportation Demand Management (TDM) plan to reduce GHGs. In practice, though, the City Planner either exempts or screens out almost every project from VMT analysis, and the few that require a more detailed analysis are typically found to have little or no impact and/or implement minimal TDM measures. Further, the VMT approach is very general and does not directly address congestion/quality of life in specific problem areas of the city. The other two pathways, which are based on level of service (LOS), address that.

City of Carlsbad growth management/direct mitigation (LOS)

For the **Direct Mitigation** pathway (in the middle of the diagram), when the city or a developer proposes a project, they conduct a Local Mobility Analysis, which includes LOS calculations for each mode of travel prioritized on the streets in their project area (vehicle, pedestrian, bicycle, and/or transit). If LOS is E or F (GMP-deficient), the developer is supposed to either construct, or make a "fair share contribution" towards the construction of, improvements that overcome any deficiencies. Unfortunately, vehicle LOS deficiencies have become largely irrelevant, because the city just exempts any deficient segments from the GMP. And the non-vehicle LOS systems have been designed to require only installation of a few sidewalk segments and small transit stop benches to get passing grades.

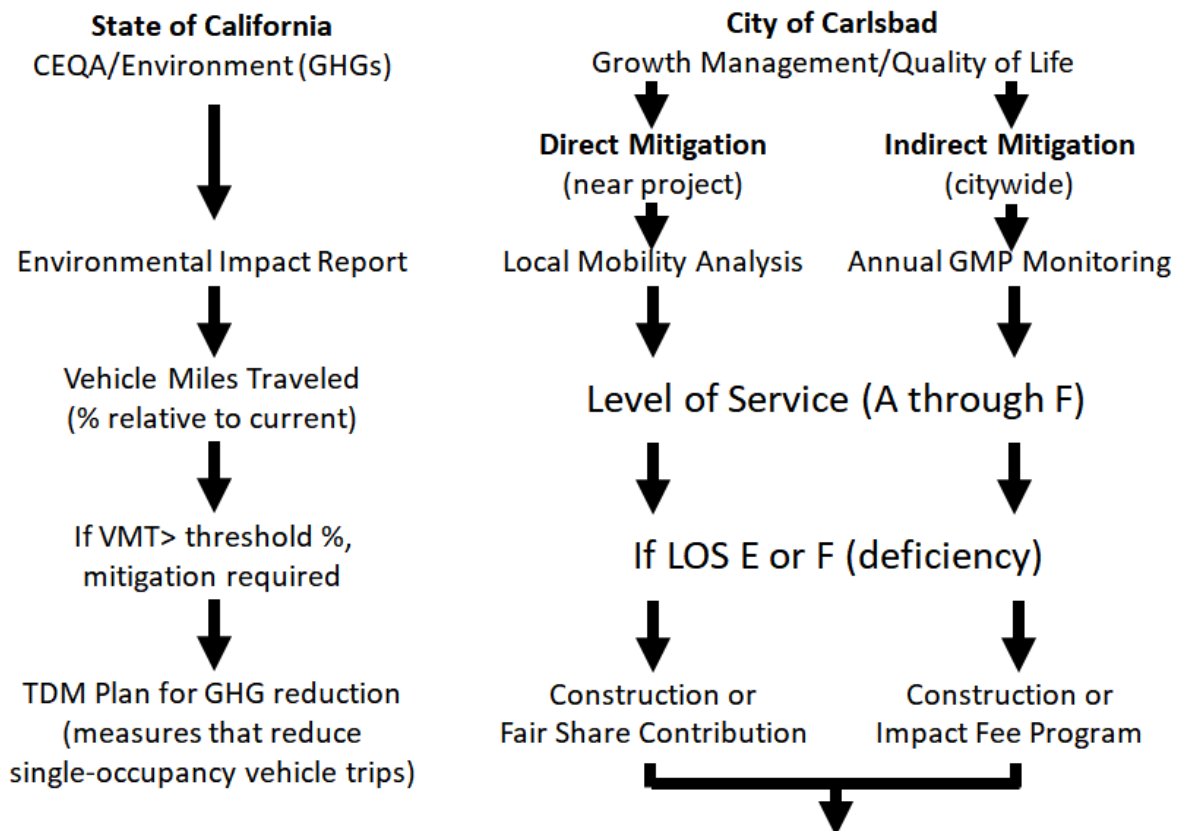
City of Carlsbad growth management/indirect mitigation (LOS)

The **Indirect Mitigation** pathway (on the right) relates to annual GMP monitoring. Similar to Direct Mitigation, LOS is supposed to be calculated for each prioritized mode of travel—but annually, and on a citywide basis. Theoretically, the GMP requires the shutdown of development in any zones that have LOS deficiencies, unless there is a planning and financial commitment to complete projects that resolve the deficiencies. Also, a list of projects that address deficiencies should be included in the Traffic Impact Fee program, into which developers make uniform contributions based on the number of vehicle trips they generate. This mitigates indirect impacts (independent of the location of the project or how congested the adjacent streets are).

In practice, though, the city just exempts the vehicle LOS deficiencies, and they have begun claiming that they never intended to enforce the LOS performance standard for the pedestrian, bicycle, and transit modes in areas of the city that were already built (which is almost the entire city). In fact, in the six years since the

requirement to monitor non-vehicle LOS went into effect, none has ever been reported. Further, the failure to keep the Traffic Impact Fee program updated means that critical projects like the city's portion of the College Boulevard extension and any non-vehicle projects have missed out on years of funding.

GMP and General Plan Mobility Element: Three complementary review pathways



Initial Suggestions

Strengthen pedestrian, bicycle, and transit LOS methods

Make these more stringent, in order to require more than just completion of missing sidewalks and bus stop benches to get a passing LOS “D” grade (e.g., see the list of improvements on the right side of the box at the bottom of the flow diagram). In addition, do not allow staff to unilaterally change the methods without public review/adoption. Also, actually do the monitoring and report it, as required by our General Plan.

Direct Mitigation

For larger developments that add significant vehicles, pedestrians, bicyclists, and/or transit users to the transportation network, require construction of more local improvements. For smaller developments, set up a system to collect fair-share contributions for local improvements, and then the city should fund its portion.

Vehicle LOS GMP exemption prerequisites

When the GMP exemption power was introduced by staff, they promised that segments would not be exempted until build-out, and that intersection and traffic signal timing improvements still would be made. And they promised that exempted segments “would not be forgotten,” because aggressive TDM measures would be implemented. Accordingly, street segments should not be exempted unless they are built-out and analyses have been done to determine whether additional turn lanes and/or extensions of existing turn lanes and/or signal timing optimization would help improve LOS. Also, already-exempted street segments that have not been analyzed, as described above, should have their exemptions lifted, if appropriate, or be analyzed.

Post vehicle LOS GMP exemption

For street segments that still do not meet the vehicle LOS standard after the above prerequisites are met, require meaningful TDM, Transportation Systems Management (TSM), and transit/ridesharing measures that directly address the local congestion problem (as prescribed in the General Plan). It is insufficient to cite a minimal plan from the anemic Climate Action Plan TDM Program, which was not designed to address exempted street congestion. If TDM is insufficient, then a different approach needs to be identified.

Indirect Mitigation/Traffic Impact Fee Program

Include in the TIF Program projects encompassing all of the improvement types in the box above, including vehicle through and turn lanes, traffic signal timing projects, sidewalk/crosswalk enhancements, countdown signals, bike lane enhancements, transit/rideshare stop improvements, and TDM measures, such as ridesharing. Also, update the program every few years rather than waiting 15 years each time.

Strengthen Transportation Impact Analysis (TIA) and VMT Analysis guidelines

Update the guidelines to enhance analytic consistency. Reduce the ability to avoid mitigation by minimizing staff discretion to waive or change rules, or to allow custom methods for each separate development.

FINALLY, DO NOT INTRODUCE ANOTHER UNPROVEN, UNMEASURABLE BLEEDING EDGE SCHEME TO REPLACE OUR CURRENT SYSTEM—ONLY TO FAIL TO IMPLEMENT THAT ONE, AS WELL, OVER THE NEXT DECADE.