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September 30, 2020

Mr. Roberto Yano, P.E.
City of National City
Engineering & Public Works Department
1243 National City Blvd
National City, CA 91950

Subject: Vehicle Miles Traveled Screen-line Analysis for the proposed CarMax Auto Sales Dealership on Plaza Bonita Road in National City, California.

Dear Mr. Yano:

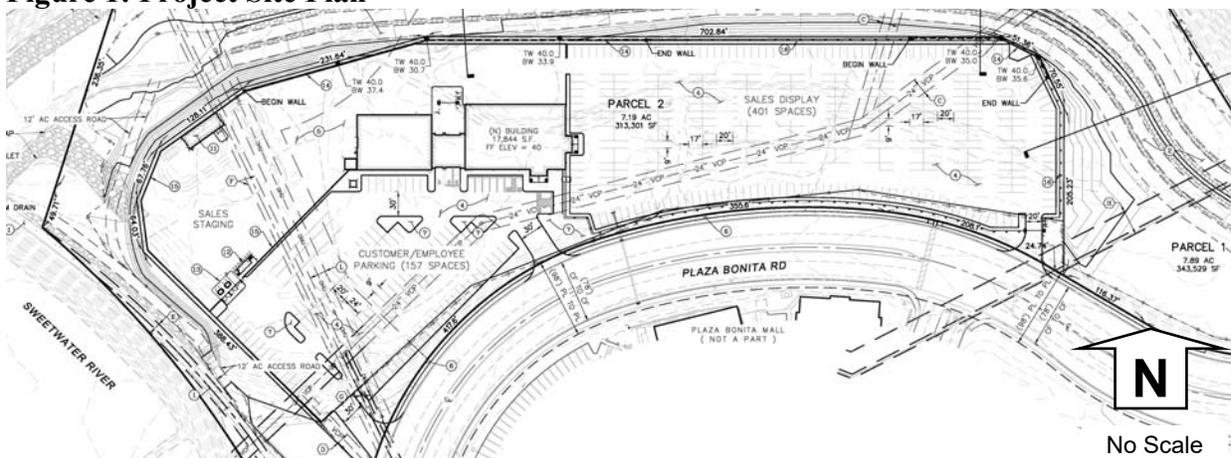
LOS Engineering, Inc. is pleased to present this Vehicle Miles Traveled (VMT) screen-line analysis for the CarMax auto sales dealership proposed on the north side of Plaza Bonita Road (northwest area of Plaza Bonita) in National City, California.

The State of California Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 was used to determine if a detailed VMT analysis would be required for this project. Excerpts from the OPR Technical Advisory are included in **Attachment A**.

PROJECT DESCRIPTION

The proposed project consists of a combined 18,774 sf of building area that includes sales, service, car wash, and presentation area. A site plan is included in **Attachment B** with an excerpt shown in **Figure 1**.

Figure 1: Project Site Plan



The CarMax project is adding a new retail establishment of 18,774 sf that will provide an additional opportunity for buying vehicles. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* states on page 16 and 17:

“By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact.”

“Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers’ travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.”

Based on the OPR guidance, the proposed CarMax with less than 50,000 sf could be considered local-serving, thus the lead agency may presume such development creates a less-than-significant transportation impact.

PROJECT ACCESS

Project access is proposed from three driveways on Plaza Bonita Road. The easterly driveway is located immediately northeast of the Westfield parking access roadway connection at Plaza Bonita Road; therefore, this easterly project driveway should be signed and restricted to right-in/right-out movements. The project has a center driveway and westerly driveway on Plaza Bonita Road that are recommended to be full movement driveways. Left turns into the westerly and center project driveway would use the existing center two-way left turn lane along Plaza Bonita Drive. The project applicant should coordinate with the City on the planned striping for angled parking along the northern side of Plaza Bonita Drive. A graphic of the planned parking is included in **Attachment C**.

CONCLUSION

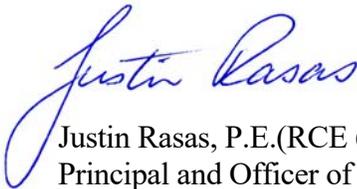
The purpose of this analysis was to determine if the proposed the CarMax auto sales dealership project would require a detailed VMT analysis. The proposed project consists of a combined 18,774 sf of building area that includes sales, service, car wash, and presentation area.

Based on the OPR guidance, the proposed CarMax with less than 50,000 sf could be considered local-serving, thus the lead agency may presume such development creates a less-than-significant transportation impact.

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Should there be any questions, please feel free to contact me.

Sincerely,
LOS Engineering, Inc.



Justin Rasas, P.E.(RCE 60690), PTOE
Principal and Officer of LOS Engineering, Inc.

Attachments

ATTACHMENT A

Excerpts from OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA



December 2018

These thresholds can be applied to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments.²⁹ It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an “apples-to-apples” comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures.

Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live.

Office VMT screening maps can be developed using tour-based data, considering either total employee VMT or employee work tour VMT. Similarly, tour-based analysis of office project VMT could consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an “apples-to-apples” comparison.

Recommended threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Because new retail development typically redistributes shopping trips rather than creating new trips,³⁰ estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-

²⁹ See Appendix 1 for a description of these approaches.

³⁰ Lovejoy, et al. (2013) *Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California*, *The Journal of Transport and Land Use*.

specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

Other Project Types

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7).

Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

Redevelopment Projects

Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

As described above, a project or plan near transit which replaces affordable³¹ residential units with a smaller number of moderate- or high-income residential units may increase overall VMT, because

³¹ Including naturally-occurring affordable residential units.

ATTACHMENT B

Site Plan

ATTACHMENT C

Plaza Bonita Drive Planned Angled Parking



P:\Project\2017.0226.05_Sweetwater_Road\CAD\Concept_Plan\0226_CONCEPT-05.dwg Plot: Forrest Baker Date: 11/17/2019 10:28:07 AM

