LOS Engineering, Inc.
Traffic and Transportation

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Multi-6443-2023 MEMO

September 12, 2025

To: Mr. Esteban Danna, Senior Planner
City of Encinitas
505 S. Vulcan Ave
Encinitas, California 92024

From: Justin Rasas, P.E.

RE: Multi-6443-2023 Ocean Bluff Roadway Capacity DEIR Comment Responses

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This memo provides additional information addressing DEIR comments about the roadway capacities and operations of Camino De Orchidia and Camino El Dorado. This analysis is provided for informational purposes only in response to public comments received by the City of Encinitas on the Draft Environmental Impact Report (DEIR) and is not required by the California Environmental Quality Act (CEQA) nor the City of Encinitas.

There were two traffic documents completed for the Ocean Bluff project. A Vehicle Miles Traveled (VMT) report dated 10/8/24 was prepared to address potential CEQA traffic impacts for the DEIR. A Local Transportation Analysis (LTA) dated 10/8/24 was prepared pursuant to The City of Encinitas Municipal Code 23.08.060 to determine if General Plan Policies 1.2 and 1.3 are affected by the project traffic. These reports help ensure that potential traffic impacts are identified and mitigated, supporting informed decision-making for both city officials and residents.

The VMT report documented how the project has a less-than-significant VMT traffic impact based on CEQA requirements and standards.

The LTA documented how the addition of project traffic does not conflict with General Plan Circulation Element Policies 1.2 (classified roadway segments) or 1.3 (intersections), and therefore, the project does not create any operational impacts to area roadways.

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For purposes of responding to public concerns about roadway operations on the neighborhood streets adjacent to the project, this analysis relies upon the City of Encinitas draft *Mobility Analysis Guidelines* (MAG), published September 2024 that provides capacities for non-circulation element roadways. Roadway capacities for Camino De Orchidia and Camino El Dorado were obtained from the MAG based on the roadway characteristics. These two roadways have two travel lanes without a media, which matches the MAG street type of "Residential Neighborway". A Residential Neighborway has a capacity of 5,000 Average Daily Trips (ADT) at an acceptable level of service, or the operational threshold at which the City determines a street to be functioning at acceptable levels (LOS C). Excerpts from the MAG are included in **Attachment A**.

The DEIR comments raised concerns about adding project traffic to Camino De Orchidia and Camino El Dorado. To address these questions, traffic data was collected on 9/9/25 along Camino De Orchidia and Camino El Dorado just north of Requeza St in order to capture all the neighborhood traffic north of Requeza St (**Attachment B**) in the existing condition without the proposed project. The projected project ADT was then added to existing traffic as shown in **Attachment C.** The addition of project traffic onto Camino De Orchidia and Camino El Dorado results in a total daily volume of traffic far below the MAG threshold as shown in **Exhibit 1.** As shown, there is 90% remaining capacity on Camino De Orchidia and 93% remaining capacity on Camino El Dorado. Accordingly, the project does not create any unacceptable operational deficiencies on these two streets.

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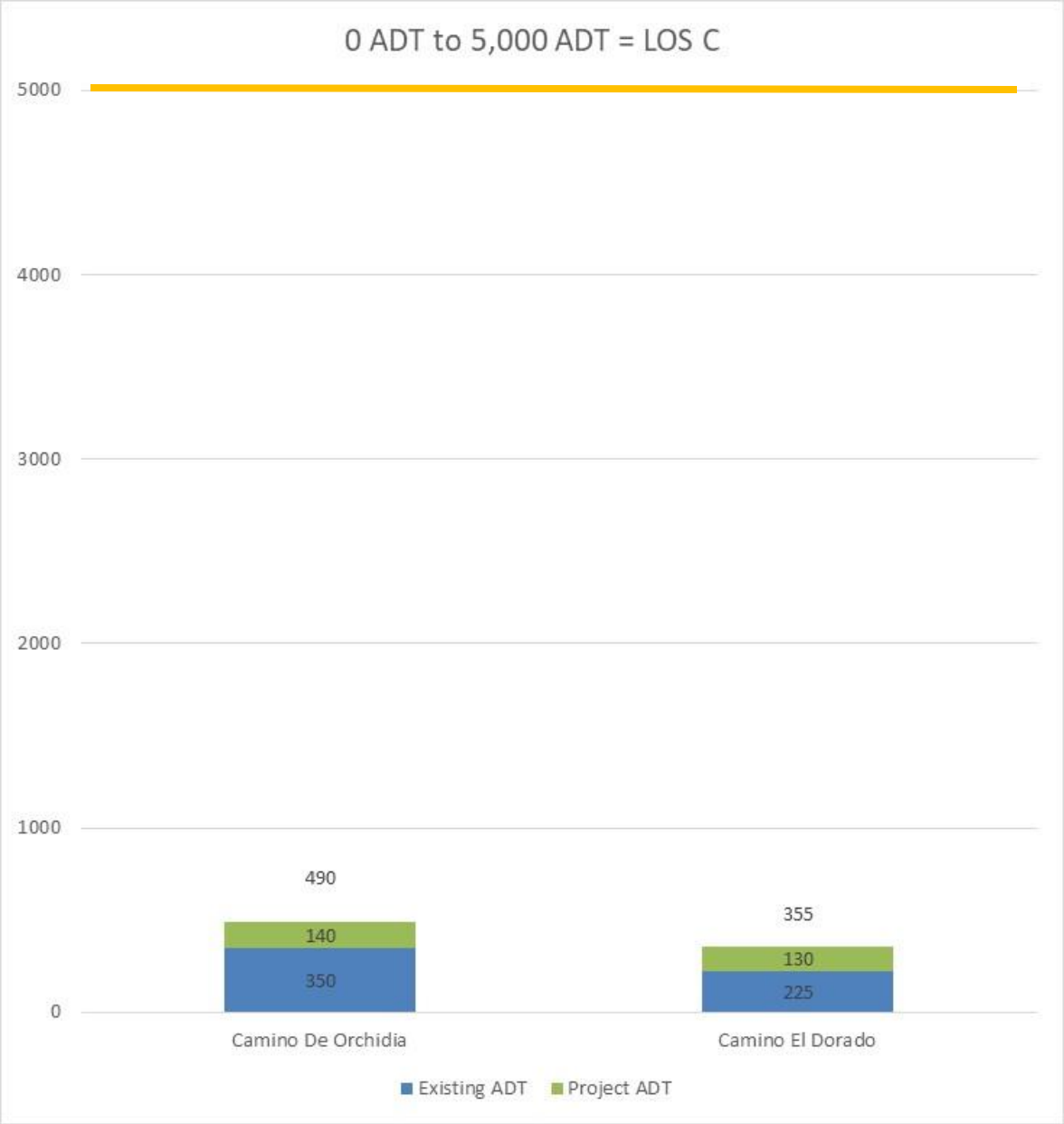
Exhibit 1: Roadway Capacities and Level of Service



Attachments

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ATTACHMENT A

Excerpts from the City of Encinitas *Mobility Analysis Guidelines*, Sept 2024

Mobility Analysis Guidelines

September 2024

I. LOCAL MOBILITY ANALYSIS

The authority for requiring non-CEQA transportation analysis and requiring project improvement conditions to address identified deficiencies lies in the City's project review authority and General Plan policies to shape the long-term development of the City, as well as protect its environmental, social, cultural, and economic resources.

The local mobility analysis (LMA) evaluates the effects of a proposed development project on the safety, operation, and mobility of circulation network users (automobiles, bicycles, pedestrians, and transit users) in the proximate area of the project. The LMA will:

- Specify the City's screening criteria and determine when a study is required, confirm the study area, and methodologies to assess the potential need for off-site operation improvements to the project study area multi-modal transportation network.
- Ensure that the local transportation facilities will have sufficient capacity to accommodate the project's demand on various modes of travel, and that improvements identified by the City are constructed when needed, consistent with the City's standards and policies.
- Ensure consistency with transportation planning documents (such as the Active Transportation Plan (ATP), Modal Alternatives Plan (MAP), or an equivalent document).
- Establish measures of effectiveness to maintain vehicular level of service (LOS) consistent with the City's General Plan Mobility Element, which may be amended as needed.
- Facilitate site project access and roadway frontage infrastructure improvements to serve the project vicinity.

Detailed information on the analysis methodologies, standards, and thresholds derives from Part II of the ITE Guidelines for Traffic Impact Studies in the San Diego Region (Appendix B). All projects are required to coordinate the scope of study and obtain City Traffic Engineering staff approval prior to preparing the LMA to ensure an efficient review process.

ANALYSIS REQUIREMENTS

A LMA shall be prepared for all projects based on the following screening criteria:

- If a proposed project is in conformance with the Land Use and/or Mobility Element of the General Plan, and it generates traffic greater than 1,000 total average daily trips (ADT) or 100 peak-hour trips.
- If a proposed project is not in conformance with the Land Use and/or Mobility Element of the General Plan, use threshold rates of 500 ADT or 50 peak-hour trips.

In addition to the above thresholds, the following procedure is applicable:

- Any application for a new nonresidential project in excess of 2,000 square feet of building area and any residential project resulting in five or more units, shall submit a traffic study to the satisfaction of the City Traffic Engineer. The traffic study shall be completed by a City-approved traffic engineer.

If the proposed project adds 20 or more peak-hour trips to any existing on- or off-ramp; consult with the City. Additional coordination with Caltrans may be needed. Trip generation as related to Vehicle Miles Traveled (VMT) shall be determined following the guidelines outlined in the City's SB 743 VMT Analysis Guidelines. Trip generation for LOS and other metrics related to bicycle and pedestrian mobility are discussed below. Both the analysis scenarios and the facilities that need to be analyzed are to be confirmed with City staff (see SB 743 VMT Analysis Guidelines) prior to conducting an LMA through the scoping process. The LMA shall use the current state-of-the-practice analysis methodologies to analyze traffic conditions. General requirements for analysis in the LMA are outlined below:

Vehicular/Automobile

Consistent with the state-of-the-practice, the City has an LOS standard of LOS D or better for all City streets. The level of service definitions for different street segments based on their classifications and average daily vehicle trips (ADT) within the City of Encinitas are provided in Table 1. Two-way left turn lane median treatments are noted in the table as "TWLTL."

Table 1 Level of Service (LOS) Standards: Street Segments Average Daily Vehicle Trip Thresholds

ID	Street Type	Lanes (# up to)	Median	Level of Service		
				C	D	E
Connectors Prime (CNP) and Connector Major (CNM) connect neighborhoods and destinations across longer distances (beyond typical bike/walk distance)						
CNP-6M	Suburban Connector	6	Raised Median	50,000	55,000	60,000
CNP-4N	Suburban Connector	4	None	35,000	40,000	45,000
CNM-4M	Suburban Connector	4	Raised Median	30,000	35,000	40,000
CNM-4L	Suburban Connector	4	TWLTL	20,000	25,000	30,000
Suburban Collectors (SC), Urban Village Collectors (UVC) and Rural Collectors (RC) provide mobility in, out and through neighborhoods and destinations						
SC-4M	Suburban Collector	4	Raised Median	25,000	30,000	35,000
SC-4L	Suburban Collector	4	TWLTL	15,000	20,000	25,000
SC-2M	Suburban Collector	2	Raised Median	15,000	18,000	20,000
SC-2L	Suburban Collector	2	TWLTL	10,000	13,000	15,000
SC-2N	Suburban Collector	2	None	5,000	7,500	10,000
SC-1N	Suburban Collector	1	None	4,000	6,500	7,500
UVC-2M	Urban Village Collector	2	Raised Median	15,000	18,000	20,000
UVC-2L	Urban Village Collector	2	TWLTL	10,000	13,000	15,000
UVC-2N	Urban Village Collector	2	None	5,000	7,500	10,000
RC-2N	Rural Collector	2	None	5,000	7,500	10,000
Residential Neighborways (RN) provide local access to residential streets. Often within walksheds of key destinations						

ID	Street Type	Lanes (# up to)	Median	Level of Service		
				C	D	E
RN-2M	Residential Neighborway	2	Raised Median	10,000	13,000	15,000
RN-2L	Residential Neighborway	2	TWLTL	7,500	10,000	13,000
RN-2N	Residential Neighborway	2	None	5,000	7,500	10,000
RN-1N	Residential Neighborway	1	None	3,000	5,000	7,500
Special Designation Corridors provide mobility along Coast Highway 101 (CC) and the El Camino Real (E), often in accordance with specific plans or other focused plans.						
E-6M	El Camino Real Suburban Corridor	6	Raised Median	50,000	55,000	60,000
CCM-4M	Coast Highway 101 Urban Village Corridor	4	Raised Median	30,000	35,000	40,000
CC-4M	Coast Highway 101 Urban Village Corridor	4	None	30,000	35,000	40,000
CC-4L	Coast Highway 101 Urban Village Corridor	4	TWLTL	30,000	35,000	40,000
CC-3M	Coast Highway 101 Urban Village Corridor	3	Raised Median	20,000	25,000	30,000

NOTE: The volumes and the average daily level of service listed are intended as a general planning guideline. Number of intersections, travel speeds, presence of on-street parking, and many other design factors affect roadway capacity.

At a minimum, the vehicular study area should include at least all site access points and major intersections (signalized and un-signalized) adjacent to the site in the study area and all local roadway segments classified in the Mobility Element, intersections, and mainline freeway locations and ramps where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic. The City Traffic Engineering staff shall approve the final study area prior to preparing the LMA.

At isolated intersections that are not heavily congested, deterministic methods that apply Highway Capacity Manual (HCM) equations for each intersection in isolation can be used. The current version of the HCM reflects current state-of-the-practice methodology. There are several software packages that use deterministic methods such as Synchro, Vistro (previously Traffix), and Highway Capacity Software. The HCM methodology assigns an LOS grade to an intersection based on estimated delay.

For intersections that are closely spaced, have a unique geometry, or are part of a congested corridor, micro-simulation analysis should be performed. Micro-simulation can more accurately evaluate intersections with unique characteristics or in congested systems because the method accounts for how intersections within a system interact with one another. For example, if a vehicle queue extends from an intersection and blocks a different intersection, micro-simulation will account for that condition, whereas deterministic methods will not. Micro-simulation should also be considered when determining required turn lane storage if the analyst believes deterministic methods are not producing reasonable maximum or 95th percentile queue lengths. There are several micro-simulation software packages such as SimTraffic (which is a module of Synchro) and Vissim.

Signalized intersections, all-way-stop intersections, and roundabouts should have the entire intersection average vehicle delay reported. Minor side-street stop intersections should have the worst-case movement average vehicle delay reported.

It is required that the methodology and software proposed for use is coordinated with City staff. City staff may also request the consultant provide micro-simulation electronic files for review.

Pedestrian

The pedestrian analysis shall document existing and planned pedestrian facilities and any substandard or missing facilities (e.g., missing sidewalk, curb ramps, major obstructions) measured from each pedestrian access point (e.g., driveways, on-site sidewalk connections to the street) and extending ¼ mile in each direction. The analysis shall also document facilities connecting to transit stops within two blocks of the project. Additional areas may be included to address special cases such as schools and retail centers. Planned facilities shall be determined based on relevant planning documents (e.g., ATP, MAP, Public Roads Standards, or equivalent plan, other City planning documents) to be provided by the City. Applicants are responsible for any improvements to accommodate transitions to existing facilities, including roadway, pedestrian, or bicycle facilities.

Bicycle/Micromobility

The bicycle analysis shall document existing and planned bicycle facilities and any substandard or missing facilities (e.g., bike lane gaps, obstructions) on roadways adjacent to the project, extending one mile in each direction and both directions of bicycle travel shall be evaluated. Planned facilities shall be determined based on relevant planning documents (e.g., General Plan, Mobility Element, ATP, MAP, or current equivalent plan, etc.) to be provided by the City.

Public Transit

The transit analysis shall focus on transit amenities and connectivity to transit, especially for projects within a half-mile walkshed to a major transit stop or a high-quality transit corridor, or a microtransit or future transit options. The analysis shall identify the closest transit routes and stops to the project within a half-mile walking distance and documentation of amenities at existing transit stops (e.g., shelters, maps, benches). Evaluation of transit amenities shall be completed considering the requirements in the latest North County Transit District (NCTD) Bus Stop Development Handbook and improved where demand of the project warrants such improvement. Project applicants shall always coordinate with City and NCTD staff to determine appropriate transit amenities and applicable guidelines. The analysis shall include discussion on the quality of the nearby transit facilities, including frequency of service, and connections to hubs, microtransit, and future transit options, etc.

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ATTACHMENT B

Traffic Data

Counts Unlimited, Inc.
PO Box 1178
Corona, CA 92878

24 Hour Volume Plot

Camino De Orchidia

25' N/ Requeza Street

9/9/2025

Start Time	9/9/2025
12:00 AM	0
1:00 AM	0
2:00 AM	0
3:00 AM	0
4:00 AM	1
5:00 AM	2
6:00 AM	4
7:00 AM	27
8:00 AM	17
9:00 AM	16
10:00 AM	20
11:00 AM	24
12:00 PM	23
1:00 PM	32
2:00 PM	23
3:00 PM	28
4:00 PM	36
5:00 PM	30
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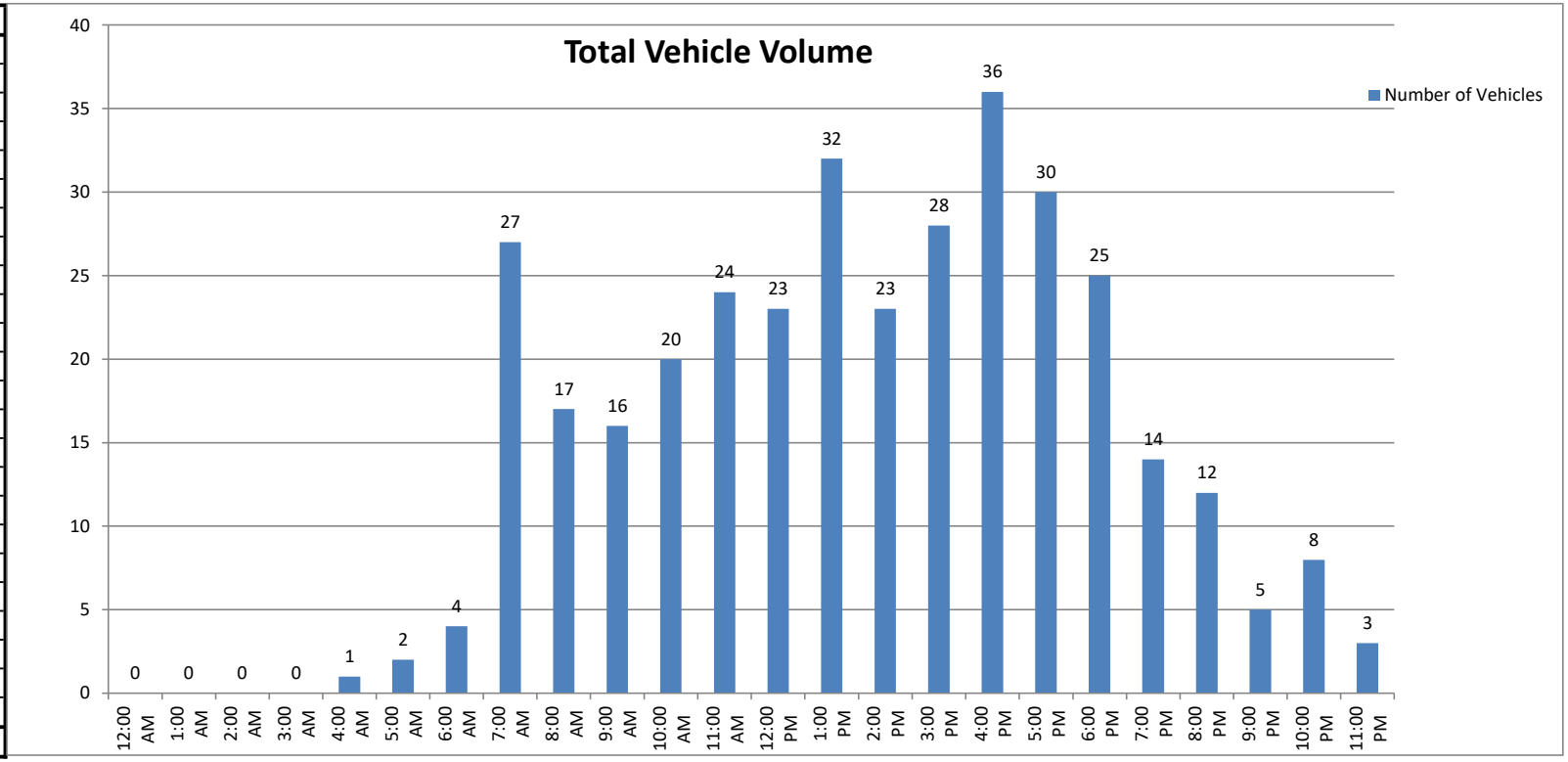
9:00 PM	5
10:00 PM	8
11:00 PM	3
Total	350



Volumes represent the combined totals for both directions

Counts Unlimited, Inc.
PO Box 1178
Corona, CA 92878

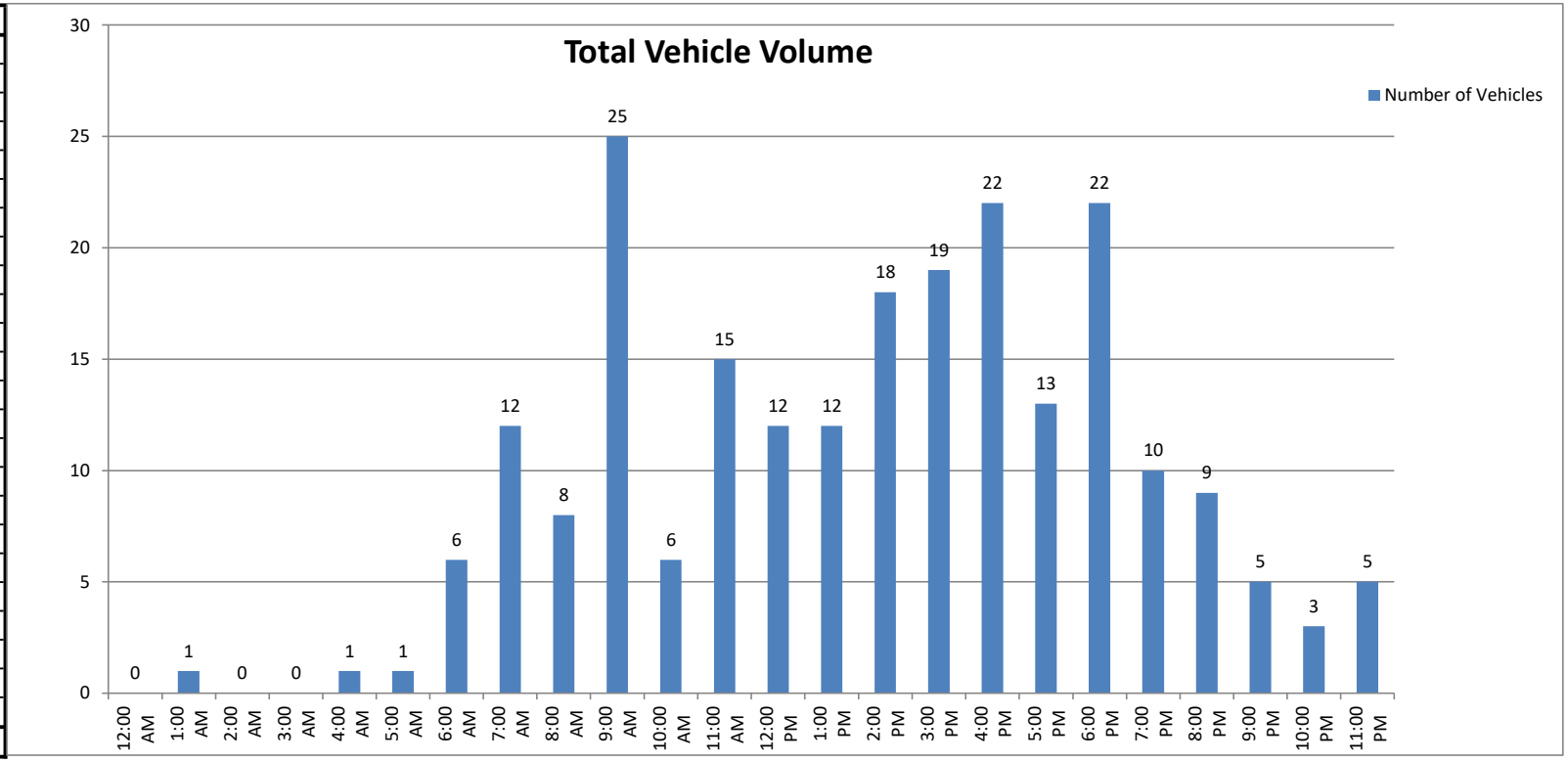
24 Hour Volume Plot

Camino Dorado

25' N/ Requeza Street

9/9/2025

Start Time	9/9/2025
12:00 AM	0
1:00 AM	1
2:00 AM	0
3:00 AM	0
4:00 AM	1
5:00 AM	1
6:00 AM	6
7:00 AM	12
8:00 AM	8
9:00 AM	25
10:00 AM	6
11:00 AM	15
12:00 PM	12
1:00 PM	12
2:00 PM	18
3:00 PM	19
4:00 PM	22
5:00 PM	13
6:00 PM	22
7:00 PM	10
8:00 PM	9
9:00 PM	5
10:00 PM	3
11:00 PM	5
Total	225



Volumes represent the combined totals for both directions

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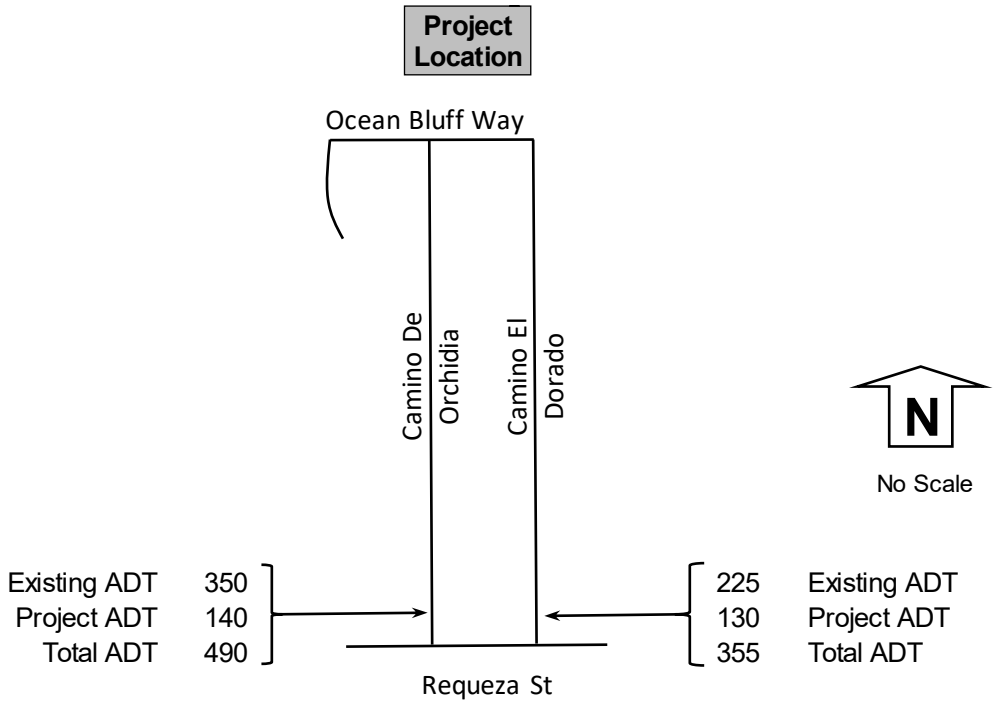
ATTACHMENT C

Existing and Project ADT



Project ADT = 140 + 130 = 270 total ADT