

Tammy Cloud-McMinn

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Tuesday, June 16, 2020 10:23 AM
To: Council Internet Email; City Clerk
Subject: VMT Analysis = # 7 on June 16, 2020 Agenda

All Receive - Agenda Item # 7
For the Information of the:
CITY COUNCIL
Date 6/16/20 CA CC
CM ACM DCM (3)

Honorable Mayor and Council

The change to VMT is a critical action by the state to help address GHG. Carlsbad has done a thorough job of evaluating local impacts and coming up with an approach that is specific to Carlsbad. We support adoption but believe further action is needed as part of its implementation to integrate this with the Climate Action and TDM plans.

Our concerns include the following:

- the threshold of 2,400 trips to require a project specific VMT analysis is very high-very few remaining projects in Carlsbad will meet that threshold. Please consider a lower threshold and/or add some discretion so that other projects could be asked to provide this additional information. It is easier to reduce the requirements over time if justified than it is to raise them after some projects have already slipped through.
- this is based on 2012 data from SANDAG. It is not acceptable when so much is determined by these numbers that SANDAG cannot keep this more current. Please join the other cities in the region and ask SANDAG to make this a higher priority- and do a better job of keeping this current and validating data for the smaller cities.
- Provide the actual VMT numbers for each TAZ- rather than just above or below 15% of city wide average. Staff have those numbers and they should be shared with you and the public. Understanding the range of variability and how these are distributed could help come up with more effective TDM and land use planning.
- Please do not treat local public facilities the same as local retail - and exempt them. Our public facilities can have large implications for distribution of trips within the city - and our public agencies should be setting examples. Making them exempt is poor public policy.

Diane Nygaard
On behalf of Preserve Calavera

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