

VEHICLE MILES TRAVELED STUDY

ARMORLITE LOFTS

San Marcos, California
November 7, 2024

LLG Ref. 3-23-3814

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1.0 INTRODUCTION

Linscott, Law & Greenspan, Engineers (LLG) has prepared this Vehicle Miles Traveled (VMT) study to determine the VMT impacts for the Armorlite Lofts project (hereafter referred to as “Project”). The Project proposes to construct 165 apartment units and 5,600 SF of commercial use at 225 Las Posas Road in the City of San Marcos.

The VMT analysis presented in this report includes the following:

- Project Description
- Vehicle Miles Traveled: Overview and Background
- VMT Significance Criteria and Methodology
- VMT Analysis
- Conclusions

2.0 PROJECT DESCRIPTION

The project applicant is requesting approval of a Specific Plan (SP-23-0001), General Plan Amendment (GPA23-0002), Rezone (R23-0001), Site Development Plan (SDP23-0003) and a Conditional Use Permit (CUP23-0002). The General Plan Designation on the Project site is Public Institutional (PI). A General Plan Amendment is proposed to change the designation to Specific Plan Area (SPA). The Zoning on the project site is Public-Institutional (P-1). A rezone is proposed to change the site zoning to Specific Plan Area (SPA). If approved, these entitlements would allow for the development of 165 apartment units and 5,600 SF of commercial use at 225 Las Posas Road in the City of San Marcos. As proposed, 15% of the units will be affordable at the very-low income level (30% to 50% of the Area Median Income or AMI). The Project is anticipated to start construction in 2026 with full occupancy in late 2027/early 2028.

Figure 2–1 shows the Project vicinity. *Figure 2–2* shows a more detailed Project area map. *Figure 2–3* shows the Project site plan.

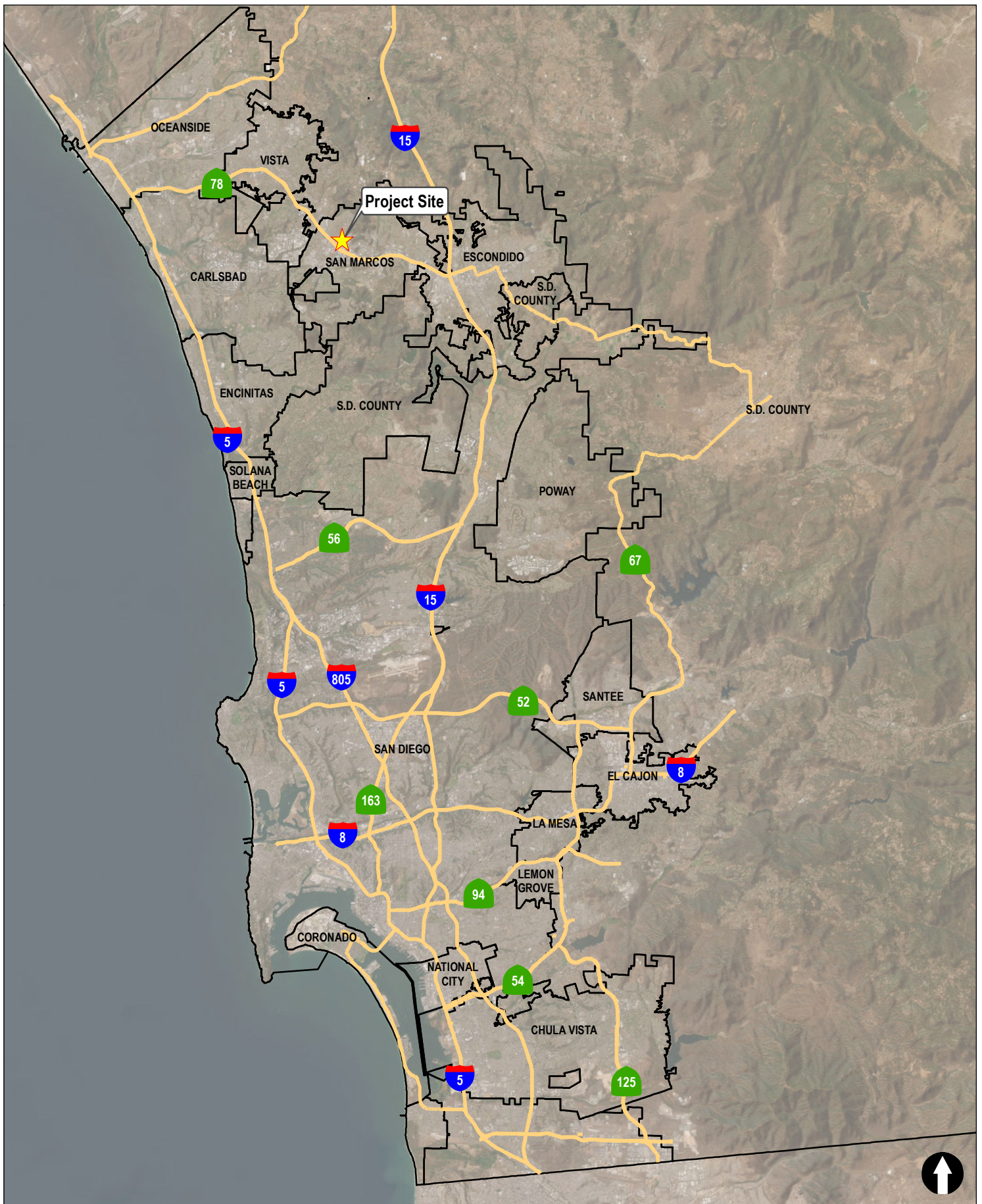
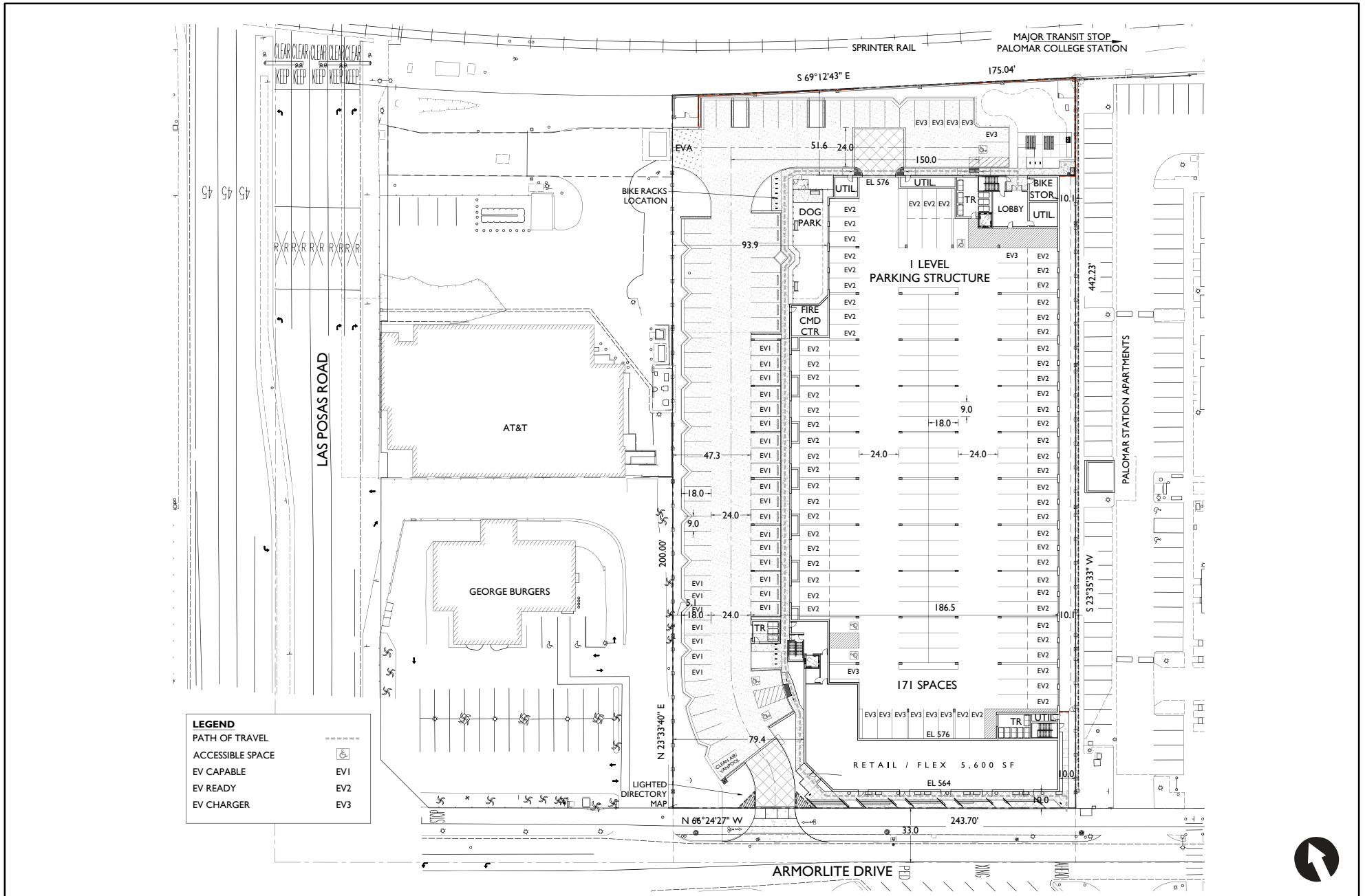




Figure 2-2

Project Area Map

ARMORLITE LOFTS



3.0 VEHICLE MILES TRAVELED: OVERVIEW AND BACKGROUND

This section presents background on an evaluation of potential transportation impacts of the Project per the California Governor's Office of Planning and Research (OPR) to implement California State Law Senate Bill (S.B.) 743 and the City's adopted *Transportation Impact Analysis (TIA) Guidelines* (dated November 16, 2020).

3.1 VMT Background

VMT is a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMT measures the efficiency of the transportation network. VMT is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (round trip) travel and is often estimated for a typical weekday to measure transportation impacts.

3.2 Senate Bill 743

In September 2013, the Governor's Office signed SB 743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. These changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The guidance identifies VMT as the most appropriate CEQA transportation metric, along with the elimination of Auto Delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that Auto Delay/LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and greenhouse gas emissions.

In December 2018, after over five years of stakeholder-driven development, the California Natural Resource Agency certified and adopted the CEQA Statute. As of July 1, 2020, the VMT guidelines are applicable statewide.

4.0 VMT SIGNIFICANCE CRITERIA & METHODOLOGY

4.1 Local / Regional Agency Transition to SB743

The City of San Marcos adopted the TIA Guidelines, that provides significance determination thresholds for VMT and VMT analysis methodologies. The City's TIA Guidelines was utilized as the basis for this VMT analysis.

4.2 Screening Criteria

Based on the *City of San Marcos Transportation Analysis Guidelines (dated November 16, 2020)*, the requirement to prepare a detailed transportation VMT analysis applies to all land development projects except for those that meet at least one of the provided screening criteria. A project that meets at least one of the screening criteria listed below would be considered to have a less-than-significant impact due to the project or location characteristics.

- Small Projects (less than 110 daily vehicle trips)
- Affordable Housing (100% deed restricted)
- Local Serving Retail and Public Facilities (50,000 square feet gross floor area or less)
- Adjacency to High-Quality Transit. A high-quality transit area is defined as the one-half mile walkshed around either of the following:
 - An existing major transit stop, defined as a site containing an existing rail transit station or the intersection of two or more bus routes with a combined frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. In addition, a rail transit station must be within 0.25 miles of bus stops serving at least one bus route with individual service intervals no longer than 30 minutes during peak commute periods per route in order to qualify as a high-quality transit area.
 - An existing stop along a high-quality transit corridor, defined as a corridor with fixed route bus service with combined service intervals (gaps between buses serving the corridor) no longer than 15 minutes during peak commute hours.

However, this presumption does not apply if the project:

1. has a floor area ratio (FAR) of less than 0.75;
 2. includes more parking for use by residents, customers, or employees of the project than required by the City;
 3. is consistent with the City's current General Plan, as determined by the City; or, replaces affordable residential units with a smaller number of moderate- or high-income residential units.
- Map-Based Screening (projects located in VMT efficient areas): Residential and employment projects that are proposed in areas that generate VMT below adopted City thresholds can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. This determination must be made using SANDAG's online residential and employment VMT maps, which show census tracts in the city where the VMT

is below the regional average. The following types of projects could be screened out using this approach:

- Residential projects proposed in census tracts with residential VMT per capita below the City's threshold of exceeding 85 percent of the SANDAG regional average
- Employment projects proposed in census tracts with work VMT per employee below the City's threshold of exceeding 85 percent of the SANDAG regional average

5.0 VMT ANALYSIS

RESIDENTIAL COMPONENT

Per the City TIA Guidelines, a VMT analysis for CEQA purposes will not be required as the Project is located in a VMT efficient area (Residential projects proposed in census tracts with residential VMT per capita below the City's threshold of exceeding 85 percent of the SANDAG regional average) based on the applicable location-based screening map produced by SANDAG. The San Diego average regional VMT/capita is 18.9 (and 15% below 18.9 would equate to 16.0) per SANDAG Series 14 (Year 2016) data.

Using the SANDAG screening map for residential projects under per capita measurements, the Project is located in census tract 200.29 and would be expected to generate 12.5 VMT/capita. This equates to 66.1% of the regional average VMT/capita. **Table 5-1** shows the VMT analysis results. **Appendix A** includes the SANDAG VMT Screening Map.

TABLE 5-1
PROJECT VEHICLE MILES TRAVELED ANALYSIS

VMT per Resident		
Geography	VMT per Resident	Exceeds Threshold?
San Diego Region	18.9	—
<i>Significance Threshold (85% of Regional Average VMT)</i>	16.0	—
Project Site	12.5	No

Source: SANDAG San Diego Region SB743 VMT Maps

Therefore, based on the City's TIA Guidelines, a VMT analysis is not required as the Project is located in a VMT efficient area and VMT impacts are presumed to be less than significant.

COMMERCIAL COMPONENT

Per the City TIA Guidelines, local-serving retail projects that are 50,000 square feet gross floor area or less can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. Retail can include shopping centers as well as standalone uses such as commercial shops, gas stations, and restaurants. Based on coordination with the applicant, the commercial use will be geared more towards the Armorlite Lofts residents. Therefore, based on the City's TIA Guidelines, a VMT analysis is not required as the proposed 5,600 SF of commercial use is far less than the screening criteria threshold for local-serving retail of 50,000 SF.

TECHNICAL APPENDICES

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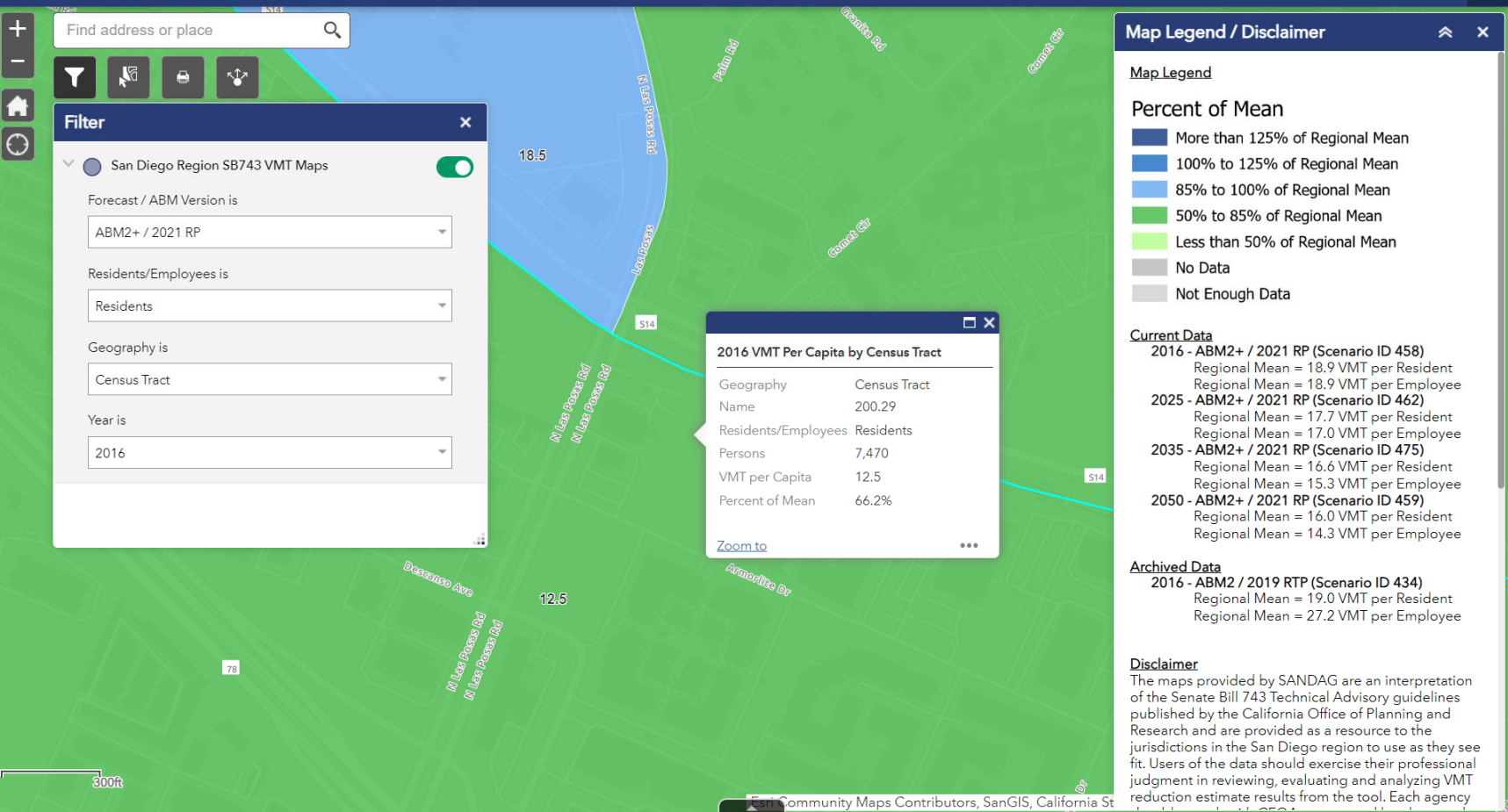
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A. SANDAG VMT Screening Map

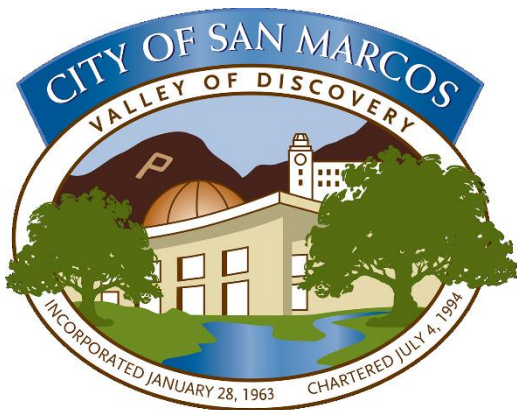
APPENDIX A

SANDAG VMT SCREENING MAP



TRANSPORTATION IMPACT ANALYSIS GUIDELINES

City of San Marcos, CA



November 16, 2020

residential component separately to determine if that portion of the project screens out of a detailed VMT analysis.

2.1.2.3. Local-Serving Retail and Public Facilities

Retail projects that are 50,000 square feet gross floor area or less can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. Retail can include shopping centers as well as standalone uses such as commercial shops, gas stations, and restaurants. This screening criteria applies to the entirety of a retail project; it would not be applied to multiple tenants at a retail site separately. For a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis.

Uses that are local-serving public facilities can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis, absent substantial evidence that they will generate significant VMT. These uses include, but are not limited to:

- ▶ Public services (e.g., police, fire stations, public utilities)
- ▶ Local-serving neighborhood schools
- ▶ Local neighborhood parks

2.1.2.4. Adjacency to High-Quality Transit

Projects that are located in a high-quality transit area can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. A high-quality transit area is defined as the one-half mile walkshed around either of the following:

- ▶ An existing major transit stop, defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a combined frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (typically defined as 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM, respectively). In addition, a rail transit station must be within 0.25 miles of bus stops serving at least one bus route with individual service intervals no longer than 30 minutes during peak commute periods per route in order to qualify as a high-quality transit area.
- ▶ An existing stop along a high-quality transit corridor, defined as a corridor with fixed route bus service with combined service intervals (gaps between buses serving the corridor) no longer than 15 minutes during peak commute hours.

However, this presumption does not apply if the project:

- ▶ has a floor area ratio (FAR) of less than 0.75;
- ▶ includes more parking for use by residents, customers, or employees of the project than required by the City;
- ▶ is inconsistent with the City's current General Plan, as determined by the City; or,