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LLG Reference: 2.22.4588.1

Subject: **Vehicle Miles Traveled (VMT) Analysis for The French Hotel**
San Juan Capistrano, California

Dear Mr. Mireles:

Linscott, Law & Greenspan, Engineers (LLG) is pleased to submit this Vehicle Miles Traveled (VMT) Analysis for The French Hotel, hereinafter referred to as the Project. The Project site, known as the "Oyharzabal" property, is generally located on the west side of Camino Capistrano, north of Forster Street, and north of El Adobe Restaurant and addressed as 31841-31871 Camino Capistrano within the City's historic downtown. The Project site is a 1.68± acre and is currently developed with two (2) historic abodes. Access to the site is now provided by a single driveway on Camino Capistrano. ***Figure 1***, which is located at the end of this letter, presents the vicinity map that depicts the Project site

PROJECT DESCRIPTION

The proposed Project includes the development of a 70-room luxury Boutique Hotel within six (6) buildings with a total floor area of 55,801 square-feet (SF) and a parking supply of 70 spaces.

Building 1, which is the Casa Manuel Garcia Adobe, totals 3,400 SF and will be rehabilitated through removal of non-historic additions and structural improvements to allow for the provision of restaurant dining on the first floor, with the upper floor converted into two (2) hotel rooms and a parlor space.

Building 4 is the Domingo Yorba Adobe, which will also be rehabilitated, with non-contributing additions removed and a rear addition constructed to provide restrooms and code-compliant facilities, allowing use as an ancillary hotel space with dining, leisure, event functions, and one (1) key within 1,493 SF of floor area, plus patio space.

New construction includes Building 1A, a 2,925-square-foot building containing kitchen, bar, and dining space with indoor-outdoor seating; Building 2, a 6,274-square-foot barn-style event building with an outdoor patio and supporting kitchen; and Building 3, a three-story, three-winged hotel containing 67 guest rooms and conference and meeting areas, arranged around a courtyard with pool, spa, and landscaped areas.

Parking will be valet-operated, with vehicles received at the valet stand located adjacent to the hotel lobby and stored in Building 5, a 2,460-square-foot mechanical parking structure located at railroad level, accommodating up to 66 cars. Valet parking will be available 24 hours per day, seven days a week throughout the year. If no valet operator is available (overnight for instance), then keys would be left at the front desk and a hotel employee, trained in valet procedures, would retrieve guest vehicles. Circulation improvements include a new 20-foot-wide driveway at the northern property line, removal of the existing central driveway to create a pedestrian plaza and public gathering area, and installation of ADA-compliant sidewalks along Camino Capistrano. Five (5) additional on-street parking spaces will be provided on the northern side of the property. ***Table 1*** provides a summary of the proposed Project components.

Proposed access will be provided by a single full access driveway on Camino Capistrano, which is located on the north side of Building 1. As a Project design feature to enhance guest access to the proposed hotel, the Project proposes two (2) on-street stalls located on Camino Capistrano for hotel guest drop-off/pick-up and/or temporary loading/unloading; no valet service will be provided on Camino Capistrano.

Figure 2 presents the existing site aerial of the Project site. ***Figure 3*** and ***Figure 4*** present the Proposed Street Level and Railroad Level Site Plans, respectively. for the Project, provided by the City and prepared by Bickel Group Architecture *prepared by Bickel Group Architecture dated October 2025*.

SB743 COMPLIANCE ASSESSMENT

VMT Assessment

On December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines. However, the new guidelines must be used starting July 1, 2020, as required in CEQA section 15064.3. The City of San Juan Capistrano recently adopted new transportation impact criteria in May 2020 to be consistent with the CEQA revisions. These new guidelines are contained within the *Amended Administrative Police No. 310* and the accompanying *City of San Juan Capistrano Vehicle Miles Traveled (VMT) Guidelines and Thresholds Memorandum* prepared by LLG Engineers, dated May 22, 2020, and provide screening criteria and methodology for VMT analysis.

VMT Screening Criteria

Under the VMT methodology, screening to determine if a project will be required to conduct detailed analysis will continue to occur. As detailed in the *City of San Juan Capistrano Screening Criteria Flow Chart,* there are five criteria to qualify for VMT screening. It should be noted that a project only needs to satisfy one of the screening criteria listed to qualify.

Weekday Daily Trips Assessment

A project may be screened-out if based on the most current *ITE Trip Generation manual,* the project generates 200 or less weekday daily trips (unadjusted driveway, i.e. gross trips).

Table 2 summarizes the trip generation rates used in forecasting the vehicular trips generated by the proposed Project, as well as the proposed Project's forecast traffic volumes. As shown in the upper half of *Table 2*, and based on the Project description, ITE Land Use 310: Hotel trip rates have been used to forecast the trip generation potential of the proposed Project.

As shown in the lower portion of *Table 2*, the proposed Project is forecast to generate 409 daily trips. Based on this forecast above, the proposed Project *will not* screen-out since it generates more than 200 daily trips.

Transit Assessment

A project may be screened-out if the project is located within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor. A major transit stop is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

However, a project may not be screened-out if it:

- has an FAR of less than 0.75;
- includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction;
- is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency);
- replaces affordable residential units with a small number of moderate- or high-income residential units.

The proposed Project is located within a Transit Priority Area (TPA) as it is within a one-half mile radius from the San Juan Capistrano train station. ***Figure 5*** presents the San Juan Capistrano VMT Screening Map which shows that the Project site is located within a TPA. Therefore, the Project screens out as long as none of the exceptions apply.

The proposed Project, excluding Building 5 (mechanical car lift) which totals 2,460 SF, has a building floor area of 53,341 SF of floor area. As the Project site is approximately 1.68± acres (equivalent to 73,212 SF), the FAR for the proposed Project is calculated to total 0.73 (FAR: 53,341 SF ÷ 73,212 SF = 0.73)[1].

Although the Project provides parking no more than required by the City, is consistent with the Regional Transportation Plan or Sustainable Communities Strategy (RTP/SCS) as confirmed by City staff, and would not replace any affordable residential units, the FAR is less than 0.75. Therefore, the Project *will not* screen out under this criteria.

Local Serving Retail Assessment

A project may be screened-out if the project is a local serving retail use of 50,000 SF or less. A local serving retail land use is defined as land uses listed under categories

[1] Source: Proposed site plan for the Project, prepared by Bickel Group Architecture dated July 2025, with clarifications provided by City staff; building floor area excludes car lift which totals 2,460 SF.

800's (Retail) and/or 900's (Services) within the most current *ITE Trip Generation Manual.*

As stated earlier, the proposed Project consists of a 70-room hotel. Therefore, the proposed Project *is not applicable* since the Project includes uses that are not local serving retail uses less than 50,000 SF.

Locally Serving Public Facility Assessment

A project may be screened-out if the project is a locally serving public facility. The following are considered locally serving public facilities (but not limited to): transit centers, public schools (private schools are not locally serving public facilities), libraries, post offices, park-and-ride lots, police and fire facilities, and government offices.

This screening criterion is *not applicable* because the proposed Project is not a locally serving public facility.

Affordable Housing Assessment

A project may be screened-out if the project is comprised of 100% affordable housing units.

Based on the above, the proposed Project *is not applicable* since it is not an affordable housing development.

VEHICLE MILES TRAVELED (VMT) SIGNIFICANT THRESHOLD

As required by the *City of San Juan Capistrano Vehicle Miles Traveled (VMT) Guidelines and Thresholds Memorandum (Dated May 22, 2020)*, projects not screened out through the steps above should complete VMT analysis and forecasting utilizing the Orange County Transportation Analysis Model (OCTAM), as provided by Orange County Transportation Authority (OCTA) to determine if they have a significant VMT impact.

Based on the City's adopted threshold for Hotel/Motel/Inn uses, a project will have a significant impact if the project generates a net increase in Total City VMT. Therefore the VMT analysis will compare the Citywide Total VMT under With Project and Without Project conditions for both the project baseline year and cumulative year scenarios.

VEHICLE MILES TRAVELED (VMT) ANALYSIS

Summarized in the section below are the VMT per Service Population (Total VMT) and Citywide boundary VMT values utilizing OCTAM for the proposed Project. It should be noted that the Project is located in Traffic Analysis Zone (TAZ) 1609 and the Project development totals were converted into Socio-Economic Data (SED) and inputted into the OCTAM by adding to the Project TAZ. ***Figure 6*** presents the OCTAM TAZ Map for the proposed Project.

Project Baseline Conditions (2026)

Based on the VMT significance criteria described in this report, the Project results in a slight increase in total citywide VMT of 1,444.16 under baseline conditions and therefore would have a significant impact. Therefore, a nominal reduction of 0.08% in citywide VMT would be required.

Project Baseline 2026 Project-Generated VMT	
Threshold: Without Project Total City VMT	1,841,235.35
2026 With Project Total City VMT	1,842,679.51
2026 Project's VMT Increased	1,444.16
Compared to the Threshold	**0.08% Reduction Needed**

Project Cumulative Conditions (2050)

Under cumulative year 2050 conditions, the Project similarly results in a minor increase in total citywide VMT of 1,322.79. Compared to the applicable threshold, a reduction of approximately 0.06% in citywide VMT would be required to mitigate the Project's nominal impact.

Project Cumulative 2050 Project-Generated VMT	
Threshold: Without Project Total City VMT	2,155,647.27
2050 With Project Total City VMT	2,156,970.06
2026 Project's VMT Increased	1,322.79
Compared to the Threshold	**0.06% Reduction Needed**

VMT Mitigation Measures

If a significant VMT impact is identified, measures to reduce the Project's VMT impact should be identified to reduce the VMT levels to a level at or below the City's thresholds. To mitigate VMT impacts, the project applicant must reduce VMT, which can be done by either reducing the number of automobile trips generated by the project or by reducing the distance that people drive. The following strategies are available to achieve this:

1. Modify the project's build environment characteristics to reduce VMT generated by the project.
2. Implement Transportation Demand Management (TDM) measures to reduce VMT generated by the project.

Strategies that reduce single-occupant automobile trips or reduce travel distance are called TDM strategies. There are several resources for determining the reduction in VMT due to TDM measures such as the CAPCOA Quantifying Greenhouse Gas Mitigation Measures.

As referenced in the *OPR Technical Advisory*, the California Air Pollution Control Officers Association's *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Designed for Local Government, Communities, and Project Developers* Report, Chapters 3 - Transportation, October 2024, (CAPCOA Report) quantifies the reduction in vehicle miles traveled (VMT) associated with a particular mitigation measure. The CAPCOA VMT reduction strategies include built environment changes and transportation demand management (TDM) actions.

The TDM strategies are sub-categorized into the following:

1) Land Use
2) Trip Reduction Program
3) Parking or Road Pricing/Management
4) Neighborhood Design
5) Transit
6) Clean Vehicles and Fuels
7) School Programs

It may be noted that there are rules and combined maximums for calculating the VMT reduction when applying multiple mitigation measures. To safeguard the accuracy and

reliability of the methods while maintaining their case of use, the following rules should be followed when considering reductions achieved by transportation measures.

Combining Measures Across Scales

According to the CAPCOA, there are nineteen (19) quantified measures at the Project/Site scale that can be applicable and nineteen (19) quantified measures at the Plan/Community scale that can be applicable. *The GHG reductions of transportation measures from different scales of application should never be combined*.

Combining Measures Within a Subsector

Effectiveness levels for multiple measures within a subsector may be multiplied to determine a combined effectiveness level. The CAPCOA recommends that measures reductions within a subsector be multiplied. This will take the following form:

$$Reduction_{subsector} = 1 - [(1 - A) * (1 - B) * (1 - C)]$$

Where A, B, and C are the individual measures reduction percentages for the measures to be combined in each subsector. In addition, each subsector has a maximum allowable reduction.

Combining Measures Across Subsectors

The CAPCOA report adopts 70 percent as a maximum for the combined VMT impact from the following four subsectors: Land Use, Neighborhood Design, Parking or Road Pricing/Management, and Transit:

$$Reduction_{multi-subsector} = 1\text{-}\ [(1 - Land) * (1 - Design) * (1 - Parking) * (1 - Transit) \leq 70\%$$

Please note that this multi-subsector maximum purposefully excludes the Trip Reduction Program subsector.

Recommended Mitigation Measures

The recommended mitigation measures for the Project type of hotel with the project locational context of suburban, consist as the following:

- T-7 (Implement Commute Trip Reduction Marketing): up to 4% maximum VMT reduction.
- T-10 (Provide End-of-Trip Bicycle Facilities): up to 4.4% maximum VMT reduction.

T-7. Implement Commute Trip Reduction Marketing

This measure will implement a marketing strategy to promote the project site employer's Commute Trip Reduction (CTR) program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and GHG emissions.

100% of hotel employees will be eligible for the program. The CAPCOA T-7 formula was applied accordingly, as shown below:

$$VMT\ Reduction = 100\% * -4.0\% * 1 = 4.0\%$$

T-10: Provide End-of-Trip Bicycle Facilities

According to CAPCOA, this measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers, which will be provided by the proposed Project. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions. The project could provide bicycle parking spaces for the Project.

The CAPCOA T-10 formula was applied accordingly, as shown below:

$$VMT\ Reduction = \frac{(1.7 * [1.0\% - (4.86 * 1.0\%)])}{(9.7 * 90.7\%)} = 0.8\%$$

The 1.7 value in the numerator represents the existing bicycle trip length for all trips in the region. The 1.0% value in the numerator represents the existing bicycle mode share for work trips in the region and the 4.86 value in the numerator represents the bike mode adjustment factor. The 9.7 value in the denominator represents the existing vehicle trip length for all trips in the region and the 90.7% value in the denominator represents the existing vehicle mode share for work trips in the region.

As discussed above, the Project would require only a nominal VMT reduction to satisfy the City's significance threshold. The estimated VMT reductions associated with T-7 and T-10 each individually exceed the reduction necessary to mitigate the Project's impact. Therefore, implementation of either T-7 or T-10 would be sufficient to reduce the Project's VMT impact to a less-than-significant level.

CONCLUSION

As detailed in the *City of San Juan Capistrano Vehicle Miles Traveled (VMT) Guidelines and Thresholds Memorandum (dated May 22, 2020),* and based on the VMT methodology, criteria, guidelines, thresholds, and analyses, the total City VMT with the proposed Project (1,842,679.51) is higher than the threshold (1,841,235.35) and would result in a net increase of 1,444.16 (0.08 %). Therefore, the project would have a significant VMT impact.

As noted above, two feasible VMT reduction measures identified from the CAPCOA Handbook may reduce project VMT by up to 4.0%. Although the VMT reduction measures reduce the Project's VMT impact to less than significant, the Project will continue to have a significant transportation impact under CEQA given the uncertainty of the implementation and effectiveness of the above-listed VMT reduction measures.

* * * * * * * * * *

We appreciate the opportunity to be of service on this Project. Should you need further assistance, or have any questions regarding this analysis, please call us at (949) 825-6175.

Very truly yours,
Linscott, Law & Greenspan, Engineers

Richard E. Barretto, P.E.
Principal

cc: Zawwar Saiyed, P.E., Principal
Angela Besa, P.E. Transportation Engineer III



Attachments

Table 1: Project Development Summary
Table 2: Project Trip Generation Forecast

Figure 1: Vicinity Map
Figure 2: Existing Aerial Photograph
Figure 3: Proposed Site Plan – Street Level
Figure 4: Proposed Site Plan – Railroad Level
Figure 5: Transit Priority Area (TPA)
Figure 6: TAZ map

TABLE 1

PROJECT DEVELOPMENT SUMMARY / MIX OF USES[2]

THE FRENCH HOTEL, SAN JUAN CAPISTRANO

Land Use / Project Description	Project Development Totals
1841-31871 Camino Capistrano Hotel Project	
❑ Building 1 (2-Story) o Rehabilitated Casa de Garcia Adobe ▪ Boutique Hotel (2 keys/rooms) ▪ Ancillary Use/Retail	3,400 SF
❑ Building 1A (1-Story) ▪ Ancillary Use (kitchen/bar/dining area)	2,925 SF
❑ Building 2 (1-Story Barn) ▪ Ancillary Use (hotel dining and kitchen)	6,274 SF
❑ Building 3 (3-Story) ▪ Boutique Hotel (67 Keys/Rooms) ▪ Ancillary Uses (conference/meeting rooms)	39,249 SF
❑ Building 4 (1-Story) ▪ Rehabilitated Domingo Yorba (1 key) ▪ Ancillary Use (hotel amenity space)	1,493 SF
❑ Building 5 (1-Story) o Parking Lifts	2,460 SF
Total Project Development	***55,801 SF (70 keys/rooms)***
Project Parking Supply ❑ Parking Lift and Surface Parking	***70 spaces***

[2] Source: Proposed site plan for the Project, prepared by Bickel Group Architecture dated October 2025, with clarifications provided by City staff.

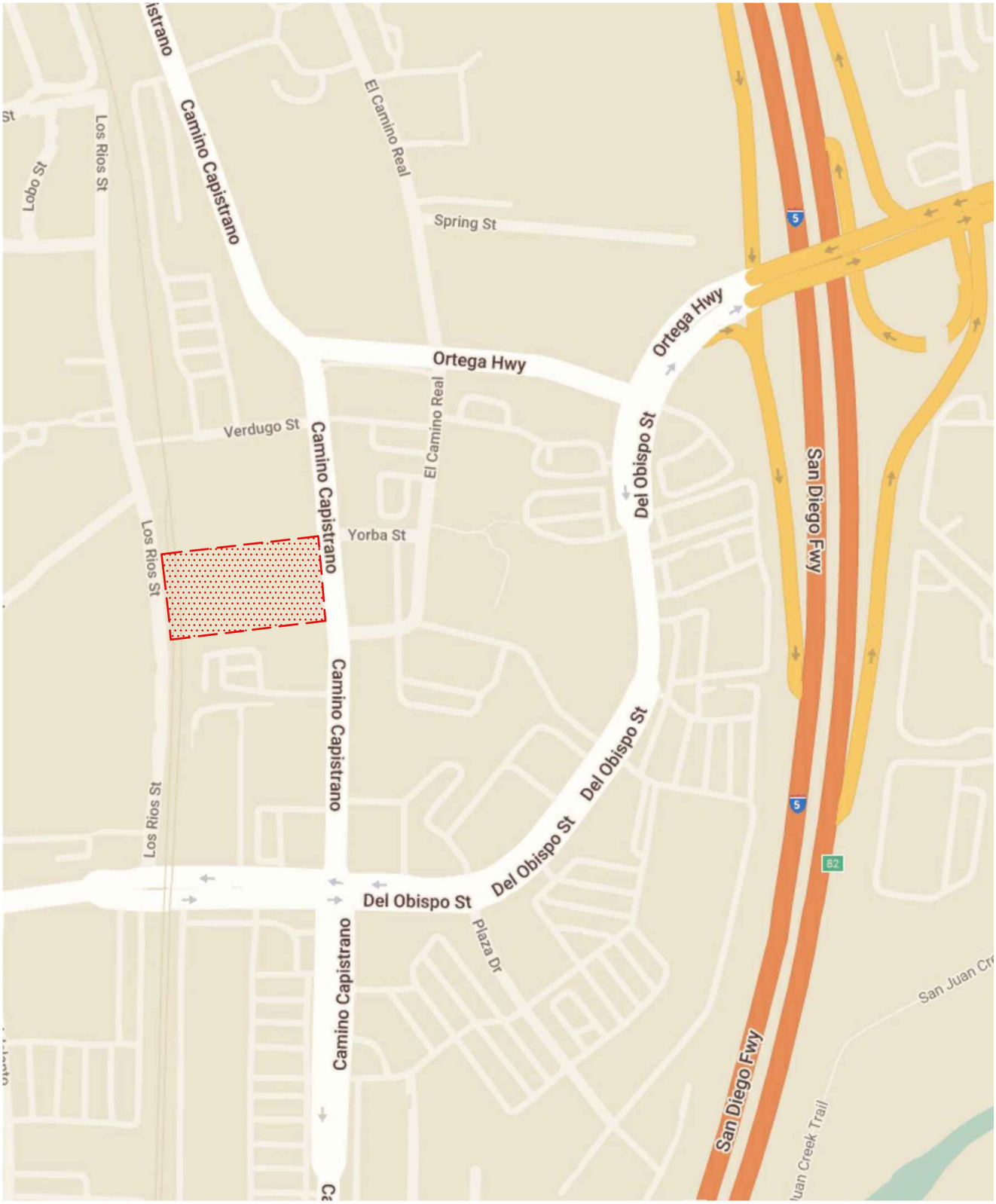
TABLE 2
PROJECT TRIP GENERATION FORECAST[3]
THE FRENCH HOTEL, SAN JUAN CAPISTRANO

Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Trip Generation Rates:							
▪ 310: Hotel (TE/Rooms)	5.84	52%	48%	0.34	51%	49%	0.47
Proposed Trip Generation:							
▪ 310: Hotel (70 Rooms)	409	13	11	24	17	16	33
Total Proposed Project Trip Generation	**409**	**13**	**11**	**24**	**17**	**16**	**33**

Notes:

- TE/Room = Trip end per Room

[3] Source: *Trip Generation*, 12th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2025).



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KEY

= PROJECT SITE

LLG

N

NO SCALE

FIGURE 1

VICINITY MAP

THE FRENCH HOTEL, SAN JUAN CAPISTRANO



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KEY

= PROJECT SITE

LLG

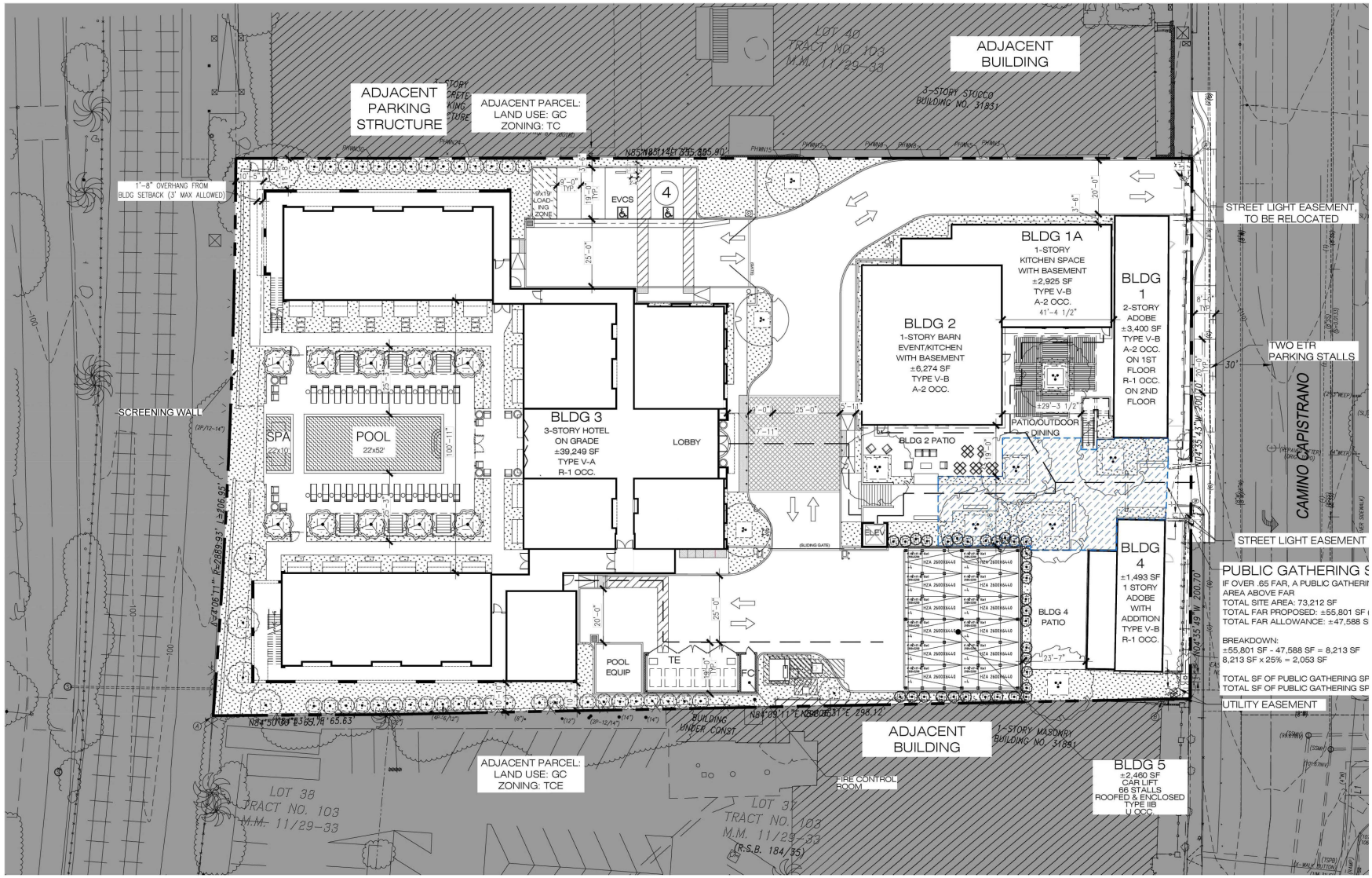
N

NO SCALE

FIGURE 2

EXISTING SITE AERIAL

THE FRENCH HOTEL, SAN JUAN CAPISTRANO



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SOURCE: BICKEL GROUP ARCHITECTURE

FIGURE 3

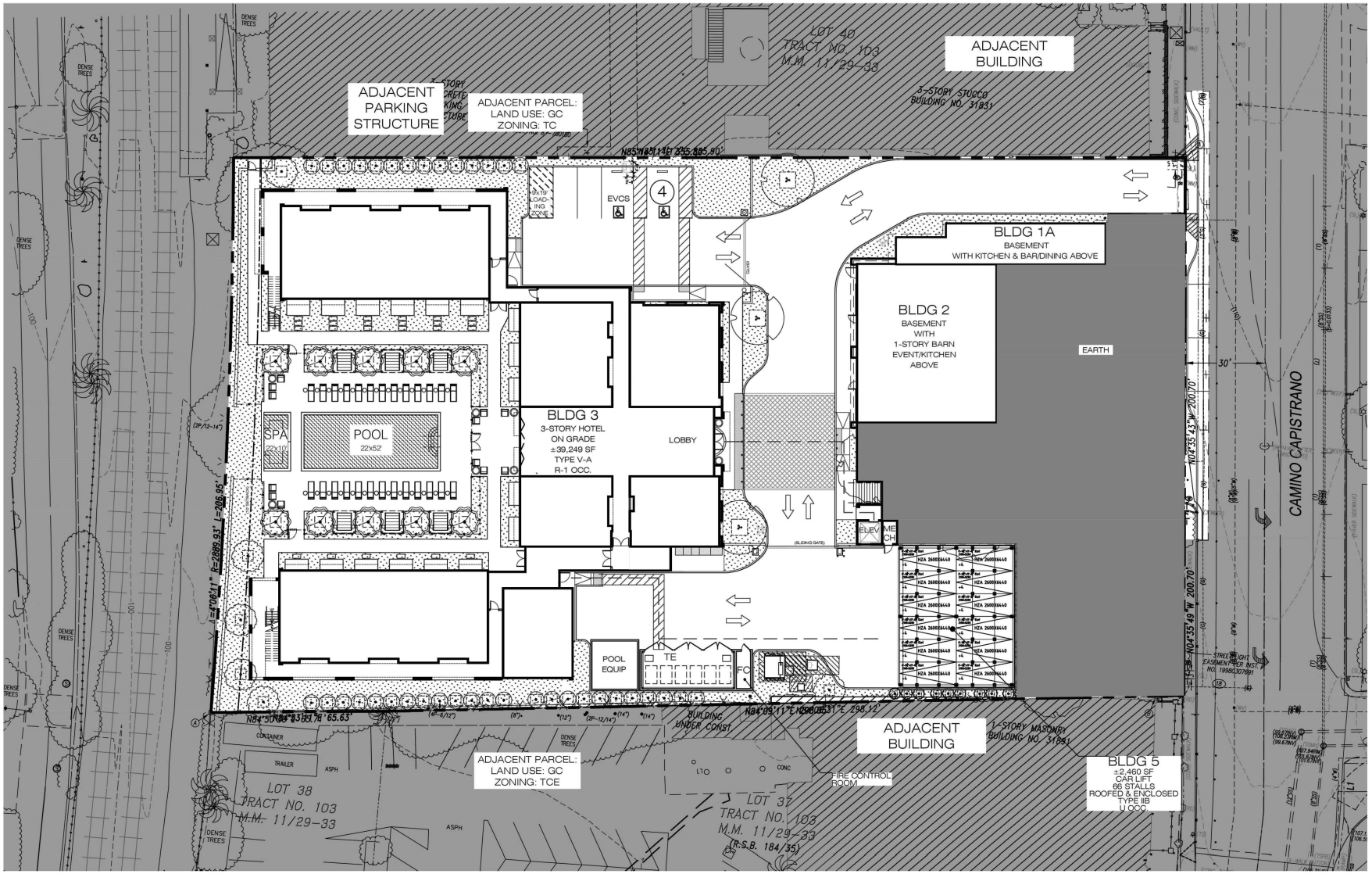
LLG

N

NO SCALE

PROPOSED SITE PLAN – STREET LEVEL

THE FRENCH HOTEL, SAN JUAN CAPISTRANO



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SOURCE: BICKEL GROUP ARCHITECTURE

FIGURE 4

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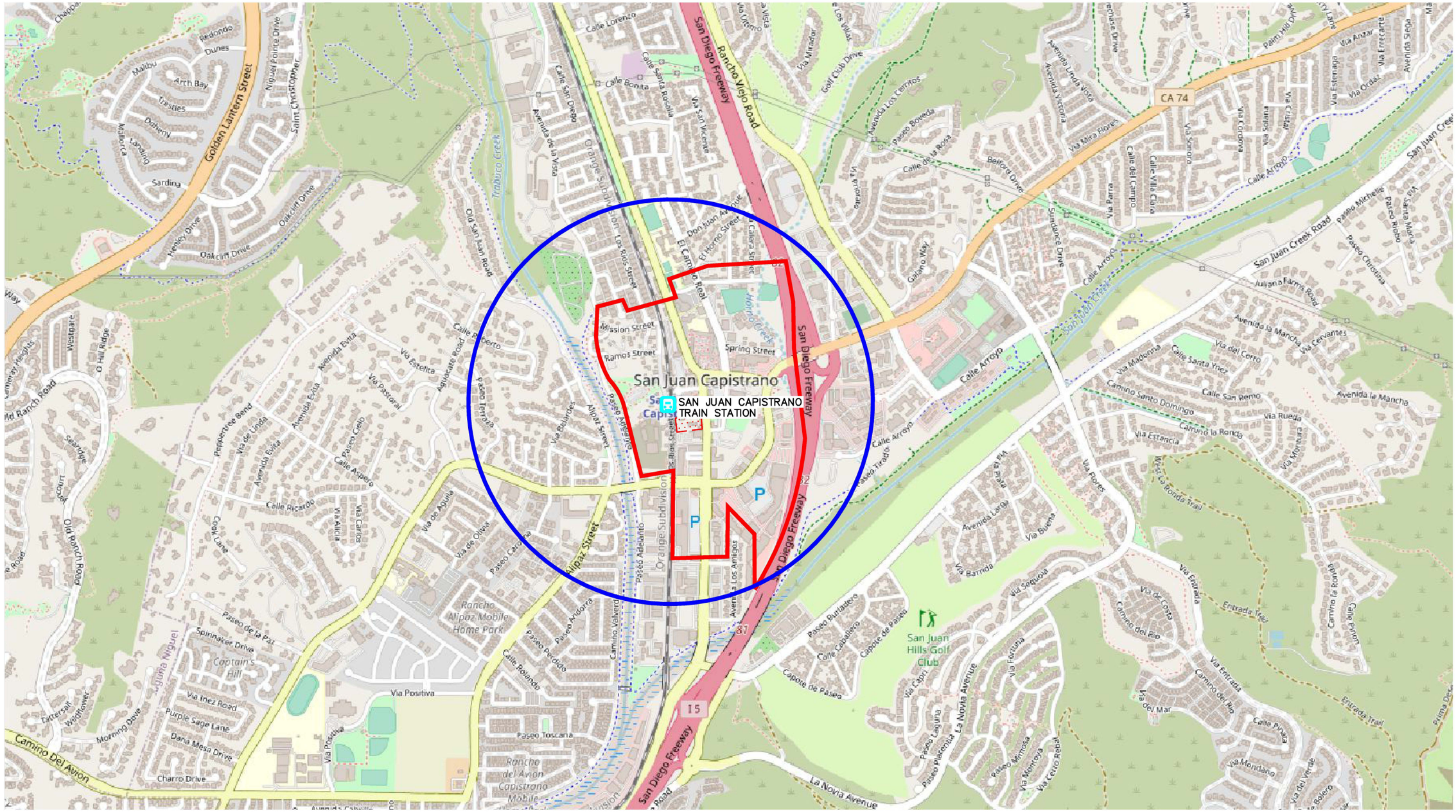
N

NO SCALE

PROPOSED SITE PLAN – RAILROAD LEVEL

THE FRENCH HOTEL, SAN JUAN CAPISTRANO



SOURCE: OPENSTREET

KEY

= PROJECT SITE

= 0.5 MI RADIUS FROM TRAIN STATION

= HISTORIC TOWN CENTER

LLG

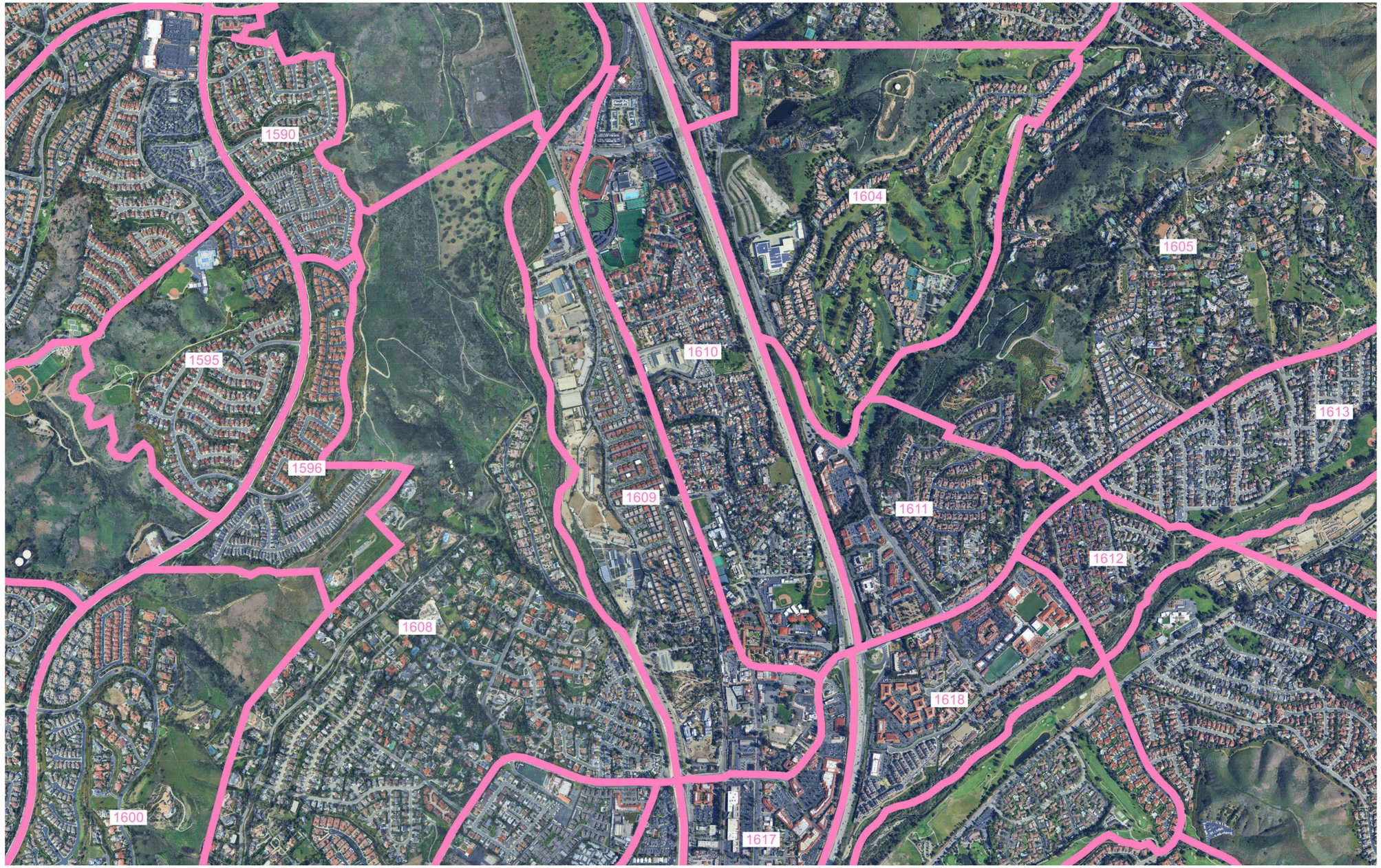
N

NO SCALE

FIGURE 5

TRANSIT PRIORITY AREA (TPA)

THE FRENCH HOTEL, SAN JUAN CAPISTRANO



SOURCE: OCTAM

LLG

N NO SCALE

FIGURE 6

TAZ MAP

THE FRENCH HOTEL, SAN JUAN CAPISTRANO

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