4.10 Transportation

This section evaluates the potential for impacts on transportation resulting from implementation of the proposed French Hotel Project (Project). This section is partially based on the following technical report:

- Vehicle Miles Traveled (VMT) Analysis for the French Hotel, San Juan Capistrano, California. LLG, July 7, 2026 (Appendix J).

A Notice of Preparation for the Project was released for public review on March 19, 2026, and an EIR Scoping Meeting was held on April 6, 2026. Comments pertaining to transportation were received during the public scoping period from Caltrans and UNITE HERE Local 11. The comments emphasized the need for a detailed evaluation of transportation-related impacts, including vehicle miles traveled (VMT), traffic operations, freight and delivery activity, loading and parking adequacy, truck circulation, pedestrian and bicycle safety, construction-related traffic impacts, and potential effects on nearby roadways and freeway facilities. Additional comments requested consideration of transit accessibility and measures to reduce vehicle trips.[1] During the public scoping meeting, members of the public expressed concerns regarding existing parking conditions in the downtown area and the need to ensure safe site access and vehicle turning movements associated with the Project.[2]

4.10.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to transportation.

4.10.2 Regulatory Setting

This section describes the federal, state, and local regulatory framework adopted to address transportation.

4.10.2.1 Federal

Code of Federal Regulations, Title 23, Section 450.220

Revised on April 1, 2005, Title 23, Section 450.220, of the Code of Federal Regulations requires each state to carry out a continual, comprehensive, and intermodal statewide transportation planning process. This planning process must include the development of a Statewide

[1] The Project Site is located within the Historic Town Center and is within walking distance of the San Juan Capistrano Metrolink/Amtrak Station, existing bicycle facilities, restaurants, shops, and other destinations. In addition, the Project's infill location and proximity to transit and pedestrian-oriented amenities support opportunities for travel by walking, bicycling, and transit.

[2] The Project would comply with the City's parking requirements by providing 70 parking spaces for 70 hotel guest rooms, consistent with the Municipal Code requirement of one parking space per hotel room. In addition, the Project would provide valet-operated parking in the proposed parking structure and associated on-site parking facilities. While parking availability was considered during Project review, parking is not a transportation impact under CEQA. Pursuant to CEQA Guidelines Section 15064.3, the effects of parking are generally considered social or economic effects rather than physical environmental impacts. Accordingly, the adequacy of parking supply does not constitute a significant transportation impact under CEQA.

Transportation Plan and Transportation Improvement Program that facilitates the efficient, economic movement of people and goods in all areas of the state.

Highway Capacity Manual

The Highway Capacity Manual, prepared by the federal Transportation Research Board, is the result of a collaborative, multiagency effort between the Transportation Research Board, Federal Highway Administration, and American Association of State Highway and Transportation Officials. The Highway Capacity Manual contains concepts, guidelines, and computational procedures for the capacity and quality of service of various highway facilities, including freeways, signalized and unsignalized intersections, rural highways, and the effects of transit, pedestrians, and bicycles on the performance of these systems. The procedures from the Highway Capacity Manual 2016 methodology were used at intersections where the Highway Capacity Manual is limited in its analysis capabilities.

4.10.2.2 State

Assembly Bill 1358: Complete Streets Act

The Complete Streets Act of 2007 ensures that transportation plans of California communities meet the needs of all users of the roadway, including pedestrians, bicyclists, users of public transit, motorists, children, older adults, and people with disabilities. Assembly Bill (AB) 1358 requires the legislative body of a city or county, upon revision of the Circulation Element of their General Plan, to identify how the jurisdiction will provide for the routine accommodation of all users of the roadway, including motorists, pedestrians, bicyclists, individuals with disabilities, older adults, and users of public transportation. The bill also directs the Governor's Office of Land Use and Climate Innovation (LCI) to amend guidelines for the development of General Plan Circulation Elements so that the construction and operation of local transportation facilities safely and conveniently accommodates everyone, regardless of their mode of travel.

California Department of Transportation Standards

The California Department of Transportation (Caltrans) is responsible for planning, designing, building, operating, and maintaining California's transportation system. Caltrans sets standards, policies, and Strategic Plans that aim to (1) provide the safest transportation system for users and workers, (2) maximize transportation system performance and accessibility, (3) efficiently deliver quality transportation projects and services, (4) preserve and enhance California's resources and assets, and (5) promote quality service. Caltrans has the discretionary authority to issue special permits for the use of state highways for other than normal transportation purposes. Caltrans also reviews all requests from utility companies, developers, volunteers, non-profit organizations, and others desiring to conduct various activities in the state highway right-of-way. The Caltrans Highway Design Manual, prepared by the Office of Geometric Design Standards (7th edition, updated 2020), establishes uniform policies

and procedures to carry out the highway design functions of Caltrans. Caltrans also prepared a Guide for the Preparation of Traffic Impact Studies (Caltrans 2002) to provide consistency and uniformity in the identification of traffic impacts generated by local land use proposals.

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which created a process to change the way transportation impacts are analyzed under the California Environmental Quality Act (CEQA). SB 743 requires the LCI to amend the CEQA Guidelines to provide an alternative to level of service for evaluating transportation impacts. Aside from changes to transportation analyses, SB 743 also includes several important changes to CEQA that apply to transit-oriented developments, including aesthetics and parking.

On December 2018, the California Natural Resources Agency certified and adopted the update to the CEQA Guidelines, implementing SB 743 (Section 15064.3). Under the LCI's revisions to the CEQA Guidelines, vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant transportation impact. Under the VMT standard, projects within a half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should generally be presumed to cause a less than significant transportation impact. Furthermore, under the CEQA Guidelines revisions, for projects other than roadway capacity projects, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, should not be considered a significant effect on the environment. The revisions to the CEQA Guidelines allow a lead agency to elect to evaluate transportation impacts under the revised CEQA Guidelines at any time and made the revised CEQA Guidelines applicable statewide beginning July 1, 2020.

4.10.2.3 Regional

Southern California Association of Governments

Founded in 1965, the Southern California Association of Governments (SCAG) is a Joint Powers Authority comprising local governments and agencies addressing regional issues. Designated both as a Metropolitan Planning Organization under federal law and as a Regional Transportation Planning Agency and a Council of Governments under state law, SCAG covers six counties and 191 cities over 38,000 square miles. SCAG develops long-range regional transportation plans, housing allocations, and contributes to air quality management plans.

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024–2050 Regional Transportation Plan/Sustainable Communities Strategy) for federal transportation conformity purposes only. Connect SoCal outlines more than $750 billion in transportation system investments through 2050.

SCAG created the SoCal Transportation Safety Resource Hub to assist local jurisdictions in advancing transportation safety and meeting annual safety targets. It serves as a centralized source for SCAG's safety programs, data, reports, and resources. The hub includes:

- Regional transportation safety goals and targets summary
- Overview of SCAG's existing transportation safety conditions
- Interactive map of SCAG's Regional High Injury Network with downloadable data
- Resources for local jurisdictions to develop their own High Injury Network
- Opportunities to engage in SCAG's ongoing safety efforts
- Access to data, tools, funding, and resources from SCAG and other organizations.

Orange County Congestion Management Program

Orange County Congestion Management Program. Orange County Transportation Authority (OCTA) is a multimodal transportation agency that began in 1991 with the consolidation of seven separate agencies. OCTA serves Orange County residents and travelers by providing the following: countywide bus and paratransit service; Metrolink rail service; the 91 Express Lanes; freeway, street, and road improvement projects; individual and company commuting solutions; motorist aid services; and regulation of taxi operations. State law requires that a Congestion Management Plan (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government in that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP. OCTA adopted the CMP in 1991 to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions in Orange County. Compliance with the CMP requirements ensures a city’s eligibility to compete for state gas tax funds for local transportation projects. The CMP was updated most recently in November 2025.

4.10.2.4 Local

City of San Juan Capistrano General Plan A complete rewrite of the City’s General Plan was last adopted in December 1999. In May 2002, the City Council approved a variety of changes to several of elements of the General Plan. In February 2022, a new Environmental Justice Element was added to the General Plan. The General Plan’s Housing Element is updated every eight years with the latest update adopted in August 2022. The City’s General Plan is the principal land use document guiding development in the City. The City’s General Plan is a comprehensive plan that establishes goals, objectives, and policies intended to guide growth and development in the City. The General Plan also serves as a blueprint for development throughout the community and is the vehicle through which the community needs, desires, and aspirations are balanced. The San Juan Capistrano General Plan is the fundamental tool for influencing the quality of life in the City.

Circulation Element

The Circulation Element of the City of San Juan Capistrano General Plan was adopted as part of the City's comprehensive General Plan update in December 1999 and was subsequently amended in May 2002 as part of a broader series of General Plan revisions approved by the City Council. On May 16, 2023, the City Council amended the General Plan to make the General Plan Circulation Element consistent with Senate Bill 743. On June 21, 2023, the City amended Administrative Policy No. 310. Preparation and Use of Traffic Assessment Guidelines for VMT Analysis and LOS Traffic Impact Guidelines. The Circulation Element establishes the framework for the planning, design, and operation of the City's transportation system, including roadways, intersections, pedestrian facilities, bicycle routes, transit services, rail corridors, and parking facilities. The element is intended to ensure the safe and efficient movement of people and goods throughout the community while preserving the City's historic character, environmental resources, and quality of life. The Circulation Element coordinates transportation planning with land use patterns identified in the General Plan and includes goals and policies intended to reduce traffic congestion, improve mobility and connectivity, enhance pedestrian and bicycle access, support transit opportunities, maintain acceptable levels of service on the roadway network, and protect scenic and historical corridors in the City.

The following goals and policies applicable to the Project and related to transportation are presented in the Circulation Element:

- **Goal C-1:** Provide a system of roadways that meets the needs of the community.
  - **Policy C-1.1.** Provide and maintain a City circulation system that is in balance with the land uses in San Juan Capistrano.
  - **Policy C-1.2.** Implement the City's Master Plan of Streets and Highways.
  - **Policy C-1.3.** Coordinate improvements to the City circulation system with other major transportation improvement programs.
  - **Policy C-1.5.** Improve existing arterial system that serves regional circulation patterns in order to reduce local congestion (Ortega Highway at 1-5).
  - **Policy C-1.6.** Reduce the congestion along local arterial roadways in commercial areas by driveway access consolidation, parking area interconnections and similar actions.
- **Goal C-4:** Minimize the conflict between the automobile, commercial vehicles, pedestrians, horses, and bicycles.
  - **Policy C-4.1.** Provide sufficient right-of-way widths along roadways to incorporate features that buffer pedestrians, horses, and bicycles from vehicular traffic.
  - **Policy C-4.3.** Install additional street improvements within areas where necessary to improve vehicular and non-vehicular safety.

4.10.3 Existing Conditions

4.10.3.1 Roadway Network

The roadway network serving the Project Site includes Interstate 5 (I-5), State Route 74 (SR-74/Ortega Highway), Camino Capistrano, Del Obispo Street, and other regional and local circulation facilities in the City of San Juan Capistrano. I-5 is a major north–south regional transportation corridor located approximately 0.25 mile east of the Project Site and provides regional access to Orange County, San Diego County, and the greater Southern California region. SR-74 (Ortega Highway) is a regional east–west arterial roadway that provides access between I-5 and inland portions of Riverside County.

The Project Site is located along Camino Capistrano in the City's Historic Town Center area. Camino Capistrano functions as a major north–south arterial roadway through downtown San Juan Capistrano and provides direct access to commercial, visitor-serving, civic, and historic land uses in the City. Del Obispo Street is a major east–west arterial roadway located north of the Project Site that provides access between I-5, Camino Capistrano, and surrounding commercial and residential areas. Additional local circulation within the vicinity of the Project Site is provided by Forster Street, Old Mission Road, Los Rios Street, and other local roadways serving the downtown area.

The OCTA Master Plan of Arterial Highways identifies major arterial and regional transportation facilities in Orange County. Within the vicinity of the Project Site, Camino Capistrano, Del Obispo Street, and Ortega Highway are designated arterial facilities that serve local and regional circulation functions. The roadway system surrounding the Project Site currently accommodates a mix of local traffic, regional commuter traffic, visitor-serving activity, pedestrian circulation, bicycle activity, and transit operations associated with the City's historic downtown environment and nearby transportation corridors.

Existing access to the Project Site is currently provided from Camino Capistrano. The surrounding roadway network also supports access to nearby historic, commercial, restaurant, hospitality, and civic uses, including the Historic Town Center area, the Los Rios Historic District, and Mission San Juan Capistrano.

I-5 Freeway

I-5 is a major regional transportation corridor under the jurisdiction of the California Department of Transportation (Caltrans) that extends in a north–south direction through Orange County and provides regional connectivity throughout Southern California. Within the vicinity of the Project Site, I-5 is located approximately 0.25 mile east of downtown San Juan Capistrano and serves as the primary regional access route to the City. Within the Project vicinity, I-5 generally consists of four to five travel lanes in each direction separated by a landscaped median and accommodates substantial commuter, commercial, and regional traffic volumes. Access to the downtown area and

the Project Site is primarily provided via the Del Obispo Street and Ortega Highway (SR-74) interchanges.

SR-74 Highway

SR-74 is a regional arterial roadway under the jurisdiction of Caltrans that provides east–west connectivity between Interstate 5 and inland portions of Orange and Riverside Counties. In the City of San Juan Capistrano, Ortega Highway serves as a major transportation corridor supporting commuter, commercial, recreational, and visitor-serving traffic. Within the vicinity of the Project Site, Ortega Highway generally consists of multiple travel lanes in each direction with signalized intersections, landscaped medians in select segments, sidewalks, bicycle facilities, and pedestrian crossings at major intersections. Ortega Highway also serves as an important gateway corridor into the City's downtown and Historic Town Center areas.

Camino Capistrano

Camino Capistrano is a major north–south arterial roadway that serves as one of the City's primary circulation corridors through downtown San Juan Capistrano and the Historic Town Center area. The roadway provides access to a mix of commercial, restaurant, hospitality, civic, residential, and historic land uses, including the Project Site, the Los Rios Historic District, and Mission San Juan Capistrano. Within the vicinity of the Project Site, Camino Capistrano generally consists of two travel lanes with on-street parking, sidewalks, pedestrian crossings, and landscaped streetscape improvements intended to support the pedestrian-oriented character of downtown San Juan Capistrano. The roadway has a posted speed limit of approximately 25 miles per hour in the downtown area. A two-way left-turn lane is provided along portions of Camino Capistrano near the Project Site to facilitate access to adjacent commercial properties.

Del Obispo Street

Del Obispo Street is a major east–west arterial roadway that provides connectivity between Interstate 5, Camino Capistrano, and surrounding residential, commercial, and visitor-serving areas in the City. The roadway serves as a key access route to downtown San Juan Capistrano and accommodates local and regional traffic volumes. Within the vicinity of the Project Site, Del Obispo Street generally includes multiple travel lanes, signalized intersections, sidewalks, bicycle facilities, and landscaped roadway improvements. The intersection of Camino Capistrano and Del Obispo Street is identified by the City as a traffic operation "Hot Spot" intersection due to existing operational characteristics and traffic volumes.

Old Mission Road

Old Mission Road is a local roadway located north of the Project Site that provides access to the Historic Town Center area, nearby civic uses, commercial properties, and historic destinations in

downtown San Juan Capistrano. The roadway primarily functions as a local circulation route and supports vehicle, bicycle, and pedestrian activity associated with the surrounding downtown environment. The intersection of Camino Capistrano and Old Mission Road is signalized and serves as one of the key study intersections evaluated in the Transportation Impact Analysis prepared for the Project.

Forster Street

Forster Street is a local east–west roadway located immediately southeast of the Project Site that provides access to surrounding commercial, restaurant, hospitality, and historic land uses in the downtown area. The roadway supports local vehicular circulation as well as pedestrian access to nearby businesses and historical resources. The intersection of Camino Capistrano and Forster Street is stop-controlled and was evaluated as part of the Transportation Impact Analysis for the Project.

Other Key Roadways

Additional roadways serving the Project vicinity include Los Rios Street, Verdugo Street, El Camino Real, and adjacent local streets in downtown San Juan Capistrano. These roadways provide local circulation and access to surrounding residential neighborhoods, commercial uses, visitor-serving destinations, rail facilities, and historical resources. The roadway network in the downtown area is characterized by a pedestrian-oriented urban form, relatively low travel speeds, on-street parking, sidewalks, and streetscape improvements intended to support the historic and visitor-serving character of the City.

4.10.3.2 Transit Service

Public transit service in the City of San Juan Capistrano is provided primarily by the OCTA, Metrolink commuter rail service, and Amtrak intercity rail service. The City's transit network provides regional and local connections to employment centers, residential communities, visitor-serving destinations, and major transportation hubs throughout Orange County and Southern California.

OCTA is the primary public transit provider serving Orange County and operates fixed-route bus service throughout the City and surrounding region. OCTA provides local and regional bus routes connecting San Juan Capistrano to neighboring cities, commercial centers, rail stations, educational institutions, and employment areas. Bus service in the City generally operates along major arterial roadways including Camino Capistrano, Del Obispo Street, and Ortega Highway, with varying service frequencies during weekday, weekend, and off-peak periods. OCTA also provides ACCESS paratransit service for eligible individuals with disabilities and mobility limitations.

San Juan Capistrano is primarily served by OCTA's bus routes: Route 1 and Route 91. Both routes connect to major community hubs, nearby coastal cities, and the San Juan Capistrano Train Depot. Refer below for more information:

- **OC Bus Route 1:** Runs along the Pacific Coast Highway, connecting San Clemente to Long Beach. In San Juan Capistrano, it primarily operates along the coast (via Pacific Coast Highway/Del Obispo), linking to Dana Point and neighboring beach cities.
- **OC Bus Route 91:** A vital inland connection that travels between the San Clemente Metrolink Station and the Laguna Hills Transportation Center. It goes through the heart of San Juan Capistrano via Camino Capistrano and Del Obispo, making stops at Mission San Juan Capistrano.

The Project Site is located in proximity to the San Juan Capistrano station, which serves both Metrolink and Amtrak rail services. Metrolink's Orange County Line and Inland Empire-Orange County Line provide commuter rail connections between San Juan Capistrano and destinations throughout Orange, Los Angeles, Riverside, and San Bernardino Counties. Amtrak Pacific Surfliner service also operates through the station, providing regional intercity rail service between San Diego, Orange County, Los Angeles, Santa Barbara, and San Luis Obispo.

The San Juan Capistrano station is located within walking distance of the Project Site and serves as a significant multimodal transportation hub in the City's Historic Town Center area. The station area accommodates rail passengers, pedestrians, bicyclists, rideshare activity, and connecting transit services associated with the surrounding downtown, visitor-serving, and historic land uses. The Project Site's proximity to regional transit services supports multimodal accessibility and provides opportunities for hotel guests, employees, and visitors to access the site using alternatives to private vehicle travel.

4.10.3.3 Bicycle and Pedestrian Facilities

In addition to regional transit services, the City supports pedestrian-oriented circulation and connectivity throughout the Historic Town Center area through sidewalks, pedestrian crossings, streetscape improvements, bicycle facilities, and connections to nearby historic and visitor-serving destinations. The downtown area surrounding the Project Site is characterized by a walkable urban environment intended to support multimodal circulation and reduce dependence on automobile travel for local trips.

4.10.3.4 Vehicle Miles Traveled

The City of San Juan Capistrano's VMT Screening Criteria Flowchart establishes a step-by-step screening process used to determine whether a proposed project may be presumed to result in a less than significant transportation impact under CEQA without requiring detailed VMT modeling. The screening process is intended to streamline transportation analysis for projects that are

consistent with Senate Bill 743 objectives promoting infill development, multimodal transportation, reduced vehicle dependence, and efficient land use patterns.

Under the City's screening methodology, a project is evaluated against five screening criteria. If a project satisfies one or more of the applicable screening criteria, the project may qualify for a presumptive less than significant VMT impact determination.

The City's five screening criteria are summarized as follows:

- **Weekday Daily Trip Assessment.** Projects generating fewer than 500 net new weekday daily vehicle trips may qualify for screening because small projects are generally not expected to result in substantial increases in regional VMT.
- **Transit Assessment.** Projects located within 0.5 mile of a major transit stop or high-quality transit corridor may qualify for screening because proximity to transit is associated with reduced automobile dependence and lower VMT generation.
- **Local-Serving Retail Assessment.** Local-serving retail projects may qualify for screening where trips are primarily redistributed from existing nearby retail destinations rather than generating substantial new regional vehicle travel demand.
- **Locally Serving Public Facility Assessment.** Public facilities serving local community needs may qualify for screening because they generally accommodate existing demand in the community rather than creating substantial new vehicle travel.
- **Affordable Housing Assessment.** Affordable housing projects may qualify for screening because such projects are typically associated with lower household VMT generation rates and support state housing and sustainability objectives.

Projects that do not satisfy any applicable screening criterion may require preparation of a detailed VMT analysis to evaluate consistency with the City's adopted VMT thresholds of significance under CEQA.

4.10.4 Method of Analysis

CEQA Appendix G Threshold (a) requires an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This EIR relies on the VMT Analysis attached as Technical Appendix J to evaluate the consistency of the Project with adopted City General Plan plans and policies. If a conflict is identified, improvements that prioritize access for and improve walking, bicycling, and riding transit facilities to provide safe and convenient streets for all users are identified. As such, a project that generally conforms with and does not obstruct the City's development policies and standards would be considered consistent under Appendix G Threshold (a).

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 level of service from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on VMT. The City of San Juan Capistrano adopted transportation impact criteria in May 2020 to be consistent with the CEQA revisions. These guidelines are contained in 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.

4.10.5 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant impact on transportation if it would:

- **Threshold TRA-a:** Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- **Threshold TRA-b:** Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- **Threshold TRA-c:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- **Threshold TRA-c:** Result in inadequate emergency access.

The Initial Study, provided as Appendix A, substantiates that there would be a less than significant impact associated with Threshold TRA-c as the Project would not substantially increase hazards due to a geometric design feature. In addition, the Initial Study substantiates that impacts associated with Threshold TRA-d would be less than significant as the Project would not result in inadequate emergency access. [3] These thresholds will not be addressed in the following analysis.

4.10.6 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. No existing plans, programs, and policies apply to development allowed under the Project for transportation.

[3] The Project Site abuts Camino Capistrano, which is identified by the San Juan Capistrano as an emergency evacuation route. Access to the Project Site would be provided via a 20-foot-wide single aisle along the northeast boundary along Camino Capistrano. Project access would continue to be provided via existing and/or improved driveways consistent with City engineering standards. Final access design would be subject to review and approval by the City's Public Works and Orange County Fire Authority (OCFA) to ensure adequate emergency vehicle access, turning radii, fire lanes, and compliance with applicable fire and building codes. The proposed 32-foot tall car lift parking structure would be internal to the site and would not encroach into the public right-of-way or affect evacuation roadway capacity.

Trip Generation

Trip generation represents the amount of traffic that is attracted to and produced by a development and is based upon the specific land uses planned for a given project. Trip generation rates for the Project are shown in Table 4.10-1, Project Trip Generation Rates, which shows the Project trip generation based upon rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (12th Edition, 2025).

Table 4.10-1. Project Trip Generation Rates

Actual Vehicle Trips Generation Rates							
Description	Daily 2-Way Units[1]	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

4.10.7 Environmental Impacts

The following sections address various potential impacts relating to transportation that could result from implementation of the Project.

Project Design Features

Recommendations for driveways providing access to the Project Site are detailed in the Traffic Impact Analysis (See Appendix A of Appendix A of this Draft EIR) and have been fully incorporated into the Project. These improvements are identified below.

Site Access Improvements

- Restripe Camino Capistrano to provide a 50-foot southbound left-turn pocket with a 50-foot opening at Forster Street to allow the provision of a two-way left-turn lane to facilitate left-turn access at the Project's driveway. The recommended left-turn storage capacity noted above would accommodate the forecast vehicle queues at Forester Street and the Project driveway.

The following improvements are recommended in conjunction with the development of the Project to ensure that adequate ingress and egress to the Project Site is provided:

- Project Driveway No. 1: Install a "STOP" sign and stop bar at Project's driveway on Camino Capistrano.
- Due to the grade/slope of driveway, install "Watch for Pedestrians" sign at the Project Driveway to alert motorists of potential pedestrian conflicts as they exit the site.

- Install “Time Restricted/Loading/Unloading Only R30B(CA)(MOD)” sign, and paint “white curb” as required at the Project’s proposed guest dropoff/pick-up area on Camino Capistrano. This area may also serve as a loading/unloading area for small delivery trucks as may be necessary.

4.10.7.1 Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

The Project's consistency with applicable transportation plans, programs, ordinances, and policies was evaluated through review of SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City of San Juan Capistrano General Plan, and applicable transportation regulations and requirements. Table 4.10-2, SCAG Connect SoCal RTP/SCS Consistency Analysis, and Table 4.10-3, General Plan Consistency Analysis, evaluate the consistency of the Project with relevant regional and local goals and policies pertaining to roadway circulation, transit accessibility, bicycle and pedestrian facilities, multimodal connectivity, and transportation safety. The consistency analyses are provided below.

SCAG Connect SoCal RTP/SCS

Table 4.10-2 evaluates the consistency of the Project with applicable goals, strategies, and policies related to transportation, land use, mobility, and sustainability. As shown therein, the Project is consistent with the objectives of Connect SoCal because it would redevelop an infill site in the Historic Town Center, approximately 0.2 mile from the San Juan Capistrano Metrolink/Amtrak Station, and would support transit use, pedestrian accessibility, and multimodal connectivity. Accordingly, the Project would not conflict with the applicable goals and policies of SCAG's Connect SoCal RTP/SCS.

Table 4.10-2. SCAG Connect SoCal RTP/SCS Consistency Analysis

Goals and Policies	Project Consistency
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	**Consistent.** The Project is located within the Historic Town Center, approximately 0.2 mile northeast of the San Juan Capistrano Metrolink/Amtrak Station, and is accessible by existing pedestrian, bicycle, transit, and roadway facilities. The Project would support a multimodal transportation network by providing visitor-serving uses within walking distance of regional transit, nearby commercial destinations, and civic facilities. In addition, the Project also includes circulation and access improvements designed to enhance mobility and safety for all users, including roadway striping modifications, driveway controls, and pedestrian warning signage along Camino Capistrano. The Project's location within a Transit Priority Area and proximity to regional transit services support multimodal travel opportunities and are consistent with the Complete Streets

Table 4.10-2. SCAG Connect SoCal RTP/SCS Consistency Analysis

Goals and Policies	Project Consistency
	objectives of Connect SoCal. Therefore, the Project would not conflict with Policy C-03.
Transit and Multimodal Integration	
07. Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	**Consistent.** The Project would support multimodal connectivity by locating a visitor-serving development in the Historic Town Center, approximately 0.2 mile northeast of the San Juan Capistrano Metrolink/Amtrak Station. The Project's proximity to regional rail service, local bus routes, existing sidewalks, and nearby commercial and civic destinations would encourage travel by transit, walking, and other alternative transportation modes. The Project also includes circulation and access improvements designed to enhance mobility and safety for all users, including roadway striping modifications, driveway controls, and pedestrian warning signage along Camino Capistrano. Therefore, the Project would facilitate multimodal connectivity and would not conflict with Policy C-07.

As shown in Table 4.10-2, the Project would be consistent with SCAG's Connect SoCal RTP/SCS goals and policies related to transportation.

City of San Juan Capistrano General Plan

Table 4.10-3 evaluates the consistency for the General Plan goals and policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As shown, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Table 4.10-3. General Plan Consistency Analysis

Goals and Policies	Project Consistency
Circulation Element	
Goal C-1: Provide a system of roadways that meets the needs of the community.	**Consistent.** The Project would use the existing roadway network, including Camino Capistrano and Ortega Highway, and would not require construction of new public roadways. The Traffic Impact Analysis determined that the Project would not result in significant operational impacts to the surrounding circulation system, and the proposed project driveway would operate at acceptable levels of service during both the AM and PM peak hours. In addition, the Project would contribute to planned transportation improvements through participation in the City's Capistrano Circulation Fee Program. Therefore, the Project would not conflict with Goal C-1.
Policy C-1.1. Provide and maintain a City circulation system that is in balance with the land uses in San Juan Capistrano.	**Consistent.** The Project would redevelop an existing developed site in the Historic Town Center with a mix of visitor-serving uses that are consistent with the surrounding land use pattern. The Traffic Impact Analysis concluded that the Project would not result in significant impacts to the surrounding circulation system, and the Project's location near transit, commercial services, and other downtown destinations would support multimodal travel opportunities. In addition, the Project would contribute toward planned circulation improvements through participation in the City's Capistrano Circulation Fee Program. Therefore, the Project would not conflict with Policy C-1.1.

Table 4.10-3. General Plan Consistency Analysis

Goals and Policies	Project Consistency
Circulation Element	
Policy C-1.2. Implement the City's Master Plan of Streets and Highways.	**Consistent.** The Project would use the existing roadway network and does not require modifications that would conflict with the City's Master Plan of Streets and Highways. Access to the site would be provided from Camino Capistrano, and the Project has been designed to maintain safe and efficient circulation in the surrounding transportation network. In addition, the Traffic Impact Analysis concluded that the Project would not result in significant impacts to roadway operations. Therefore, the Project would not conflict with Policy C-1.2.
Policy C-1.3. Coordinate improvements to the City circulation system with other major transportation improvement programs.	**Consistent.** Policy C-1.3 encourages development projects to contribute toward transportation infrastructure improvements necessary to maintain roadway safety and circulation. The Project includes transportation-related improvements identified in the Traffic Impact Analysis to ensure safe and efficient access to the site. These improvements include restriping Camino Capistrano to provide a southbound left-turn pocket and two-way left-turn lane access at the Project driveway, installation of a stop sign and stop bar at the Project driveway, pedestrian warning signage to alert motorists exiting the site, and curbside loading/unloading controls along Camino Capistrano. These improvements would facilitate safe vehicle ingress and egress, improve circulation along the adjacent roadway network, and support the City's transportation infrastructure objectives. In addition, the Project would contribute toward planned circulation improvements through participation in the City's Capistrano Circulation Fee Program. Therefore, the Project would not conflict with and would support implementation of Policy C-1.3.
Policy C-1.5. Improve existing arterial system that serves regional circulation patterns in order to reduce local congestion (Ortega Highway at 1-5).	**Consistent.** Although the Project is located near the Ortega Highway/I-5 corridor, the Traffic Impact Analysis concluded that the Project would not result in significant impacts to the surrounding circulation system or regional roadway network. The Project would implement roadway and access improvements along Camino Capistrano, including restriping to provide a southbound left-turn pocket and two-way left-turn lane access at the Project driveway, which would facilitate safe and efficient circulation in the Project vicinity. Additionally, the Project would contribute toward future transportation improvements through participation in the City's Capistrano Circulation Fee Program, which helps fund roadway and intersection improvements serving local and regional travel demands. Therefore, the Project would not conflict with Policy C-1.5.
Policy C-1.6. Reduce the congestion along local arterial roadways in commercial areas by driveway access consolidation, parking area interconnections and similar actions.	**Consistent.** The Project would redevelop an existing developed property in the Historic Town Center and would use a consolidated access point from Camino Capistrano. The Project's location in downtown San Juan Capistrano places it within walking distance of restaurants, retail businesses, civic uses, and the San Juan Capistrano Metrolink/Amtrak Station, reducing reliance on automobile travel and supporting internal trip capture opportunities. Therefore, the Project would not conflict with Policy C-1.6.
Goal C-4: Minimize the conflict between the automobile, commercial vehicles, pedestrians, horses, and bicycles.	**Consistent.** The Project has been designed to provide safe and efficient access for vehicles, pedestrians, and bicyclists in the Historic Town Center. The Project includes pedestrian connections throughout the site and provides convenient access to surrounding sidewalks, nearby commercial destinations, and the San Juan Capistrano Metrolink/Amtrak Station. The Traffic Impact Analysis identified access improvements, including a southbound left-turn pocket and two-way left-turn lane at the Project

Table 4.10-3. General Plan Consistency Analysis

Goals and Policies	Project Consistency
Circulation Element	
	driveway, as well as pedestrian warning signage at the driveway to alert exiting motorists to potential pedestrian activity. These features would help minimize conflicts among vehicles, pedestrians, and bicyclists while maintaining safe circulation within and adjacent to the Project Site. Therefore, the Project would not conflict with Goal C-4.
Policy C-4.1. Provide sufficient right-of-way widths along roadways to incorporate features that buffer pedestrians, horses, and bicycles from vehicular traffic.	**Consistent.** The Project would not reduce existing roadway rights-of-way or interfere with the City's ability to provide pedestrian, bicycle, or other transportation facilities along adjacent roadways. The Project includes pedestrian access improvements and connections to the existing sidewalk network along Camino Capistrano, providing safe pedestrian circulation between the Project Site, downtown destinations, and nearby transit facilities. In addition, the Traffic Impact Analysis recommends pedestrian warning signage at the Project driveway to improve safety where vehicles and pedestrians may interact. Because the Project would maintain and enhance pedestrian accessibility and would not preclude existing or future bicycle, pedestrian, or equestrian facilities in the public right-of-way, the Project would not conflict with Policy C-4.1.
Policy C-4.3. Install additional street improvements within areas where necessary to improve vehicular and non-vehicular safety.	**Consistent.** The Project incorporates transportation improvements identified through the Traffic Impact Analysis to enhance both vehicular and pedestrian safety. These improvements include restriping Camino Capistrano to provide a southbound left-turn pocket and two-way left-turn lane serving the Project driveway, installation of a stop sign and stop bar at the Project driveway, pedestrian warning signage to alert motorists exiting the site, and designated loading and unloading controls along Camino Capistrano. Collectively, these improvements would improve site access, reduce potential vehicle conflicts, and enhance safety for pedestrians traveling along adjacent public streets. Therefore, the Project would not conflict with Policy C-4.3.

As shown in Table 4.10-2, the Project would be consistent with the General Plan goals and policies related to transportation.

Conclusion

As shown in Tables 4.10-1 and 4.10-2, the Project would be consistent with the applicable transportation-related goals and policies of SCAG's Connect SoCal RTP/SCS and the City of San Juan Capistrano General Plan. The Project would redevelop an infill site in the Historic Town Center, approximately 0.2 mile from the San Juan Capistrano Metrolink/Amtrak Station, and would support multimodal transportation opportunities through its transit-accessible location, pedestrian connectivity, and transportation improvements identified in the Traffic Impact Analysis (Appendix A of Appendix A of this Draft EIR) and herein under “Project Design Features” above. Accordingly, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.10.7.2 Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Impact Analysis

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.

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 Trip 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 4.10-1 above, 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. 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 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 jurisdiction;
- is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency); or
- replaces affordable residential units with a small number of moderate- or high-income residential units.

The Project Site is located approximately 0.2 mile northeast of the San Juan Capistrano Metrolink/Amtrak Station and therefore is located in a Transit Priority Area. The station provides regional rail service through Metrolink and Amtrak and is accessible from the Project Site via existing pedestrian facilities. Therefore, the Project screens out if none of the exceptions apply.

The Project consists of the rehabilitation and adaptive reuse of the historic Domingo Yorba Adobe and Casa Manuel Garcia Adobe, demolition of select non-historic structures, and construction of a 70-room boutique hotel, restaurant, event facilities, parking structure, and associated site improvements on approximately 1.68 acres. The Project would provide visitor-serving uses in the Historic Town Center and is located within walking distance of regional rail service, local bus routes, commercial services, restaurants, and civic destinations.

The Project would provide 70 parking spaces, which is consistent with the City's parking requirements, and therefore would not provide parking in excess of City standards. The Project would not replace any affordable residential units and is consistent with SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as confirmed by City staff (refer to Table 4.10-3).

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)[4].

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.

[4] 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.

Local-Serving Retail Assessment

A project may be screened out if it consists exclusively of a local-serving retail use of 50,000 square feet or less. Local-serving retail uses are defined as land uses listed under Categories 800 (Retail) and/or 900 (Services) in the most current ITE Trip Generation Manual.

The Project consists of the redevelopment of a 1.68-acre site with a 70-room boutique hotel, including the rehabilitation of the Casa Manuel Garcia Adobe and Domingo Yorba Adobe, construction of hotel guest room buildings, restaurant and dining facilities, event and meeting spaces, a fitness center, pool area, public gathering space, and valet-operated parking. The Project is primarily characterized as a hotel land use and includes associated hospitality, lodging, event, and ancillary uses.

Although the Project includes restaurant and dining components that may be considered local-serving uses, the Project's primary land use is a hotel, which is not a local-serving retail use under the City's screening criteria. In addition, the Project includes hotel rooms, event spaces, conference facilities, and other visitor-serving amenities that are not classified as retail or service uses. Therefore, the Project does not qualify as a local-serving retail project of 50,000 square feet or less and would not satisfy the Local-Serving Retail Assessment screening criterion.

Locally Serving Public Facility Assessment

A project may be screened out if the project is a locally serving public facility. Locally serving public facilities include, but are not limited: 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. Based on the above, the proposed hotel use would not screen out since it is not a local-serving public facility.

Affordable Housing Assessment

A project may be screened out if the project is comprised of 100 percent affordable housing units. Based on the above, the Project will not screen out under this criterion since it is not an affordable housing development.

Conclusion

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.

VMT Analysis

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 compares the Citywide Total VMT under With Project and Without Project conditions for both the Project baseline year and cumulative year Scenarios.

Summarized 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 4.10-1 presents the OCTAM TAZ Map for the Proposed Project.

Project Baseline Conditions (2026)

Based on the VMT significance criteria described above, 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 without mitigation. Therefore, as shown in Table 4.10-4, below, a nominal reduction of 0.08% in citywide VMT would be required.

Table 4.10-4. 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. As shown in Table 4.10-5, below, compared to the applicable threshold, a reduction of approximately 0.06% in citywide VMT would be required to mitigate the Project's nominal impact.

Table 4.10-5. 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**

The Proposed Project would be required to incorporate mitigation measure MM TR-1.

Level of Significance Before Mitigation: Potentially significant .

Mitigation Measures: MM-TR-1.

4.10.8 Cumulative Impacts

The following sections address various potential cumulative impacts relating to transportation that could result from implementation of the Project.

4.10.8.1 Cumulative Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

As identified in the analysis presented in Tables 4.10-2 and 4.10-3, and Threshold TRA-a above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Cumulative development projects would be reviewed for consistency with adopted programs, plans, ordinances, or policies, including but not limited to SCAG's Connect SoCal RTP/SCS, and the City of San Juan Capistrano General Plan, as applicable. Even if cumulative development projects are in conflict, the Project would not contribute to a cumulative impact and thus would not be cumulatively considerable because the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, as identified through the analysis presented in this section of the Draft EIR.

4.10.8.2 Cumulative Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

As discussed in Section 4.10.7.2, the Proposed Project does not satisfy the City's applicable VMT screening criteria and was therefore evaluated using the Orange County Transportation Analysis Model (OCTAM). Under cumulative year 2050 conditions, the Proposed Project would increase Citywide Total VMT from approximately 2,155,647.27 under Without Project conditions to approximately 2,156,970.06 under With Project conditions, representing a net increase of approximately 1,322.79 VMT. Because the City's adopted threshold for hotel/motel/inn uses considers a net increase in Total City VMT to be a significant impact, the Proposed Project would result in a significant cumulative VMT impact prior to mitigation. An approximately 0.06 percent reduction in Citywide Total VMT would be required to reduce the Project's cumulative-year impact to a less-than-significant level.

Implementation of MM TR-1 would require preparation and implementation of a Transportation Demand Management (TDM) Plan incorporating strategies intended to reduce single-occupancy vehicle trips and encourage alternative modes of transportation, including commute trip reduction marketing and end-of-trip bicycle facilities. These strategies have the potential to reduce Project-related VMT; however, their actual effectiveness depends on factors such as employee participation, individual travel choices, use of available bicycle facilities, and continued utilization of alternative transportation modes. Although MM TR-1 would require implementation and ongoing monitoring of the identified TDM strategies, neither the Project Applicant nor the City can compel employees to

carpool, use transit, walk, or bicycle to work. Therefore, the approximately 0.06 percent reduction in Citywide Total VMT required under cumulative year 2050 conditions cannot be assured.

Other past, present, and reasonably foreseeable future development within the City and surrounding region would also contribute vehicle travel and VMT under cumulative conditions. Such projects would be evaluated in accordance with applicable City VMT Guidelines and CEQA requirements, including project-specific VMT analysis and mitigation where required. However, compliance by other cumulative projects with applicable VMT review requirements would not eliminate the Proposed Project's modeled increase in Citywide Total VMT under 2050 conditions. Because the Proposed Project would result in a net increase in Citywide Total VMT under cumulative conditions and implementation of MM TR-1 cannot be demonstrated to reliably achieve the reduction necessary to avoid the City's adopted significance threshold, the Proposed Project's contribution to cumulative VMT impacts would remain cumulatively considerable. Therefore, cumulative impacts under Threshold TRA-b would be significant and unavoidable after mitigation.

4.10.9 Level of Significance Before Mitigation

4.10.9.1 Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

The Proposed Project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

4.10.9.2 Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Without mitigation, the Proposed Project would have a potentially significant VMT impact.

4.10.10 Mitigation Measures

MM TR-1: **Transportation Demand Management Plan.** Prior to the issuance of an occupancy permit, the Project Applicant shall be required to develop and implement a Transportation Demand Management (TDM) Plan to reduce single-occupancy vehicle trips for employees and encourage alternative modes of transportation.

TDM strategies have been evaluated for the purpose of reducing VMT. The purpose of TDM strategies is to reduce the need for single-occupancy automobile trips. The City Guidelines also provide a list of the transportation measures as identified by California Air Pollution Control Officers Association (CAPCOA). Table 4.10-6, TDM Strategies, outlines the TDM strategies applicable to the Proposed Project.

Table 4.10-6. TDM Strategies

Measure	TDM Description	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 to 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.	May provide up to a 4.0% reduction in Project VMT.
T-10 End-of-Trip Bicycle Facilities	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. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions.	May provide a 0.8% reduction in Project VMT.

4.10.11 Level of Significance After Mitigation

4.10.11.1 Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Implementation of MM TR-1 would require preparation and implementation of a TDM Plan incorporating commute trip reduction marketing and end-of-trip bicycle facilities to reduce single-occupancy vehicle trips and encourage alternative modes of transportation. As summarized in Table 4.10-6, these strategies have the potential to reduce Project-related VMT. However, the estimated reduction percentages represent potential effectiveness and do not establish that a specific level of VMT reduction would necessarily occur at the Proposed Project. Actual effectiveness would depend on factors outside the Project Applicant's direct control, including employee participation, individual travel choices, use of available bicycle facilities, and continued utilization of alternative transportation modes.

Although MM TR-1 would require implementation and ongoing monitoring of the identified TDM strategies, neither the Project Applicant nor the City can compel employees to carpool, use transit, walk, or bicycle to work. Therefore, the approximately 0.08 percent reduction in Citywide Total VMT required under 2026 baseline conditions cannot be assured. Similarly, the approximately 0.06 percent reduction required under 2050 cumulative conditions cannot be assured. Because substantial evidence does not demonstrate that implementation of MM TR-1 would reliably achieve the VMT reduction necessary to reduce the impact below the City's adopted significance threshold, the Proposed Project's impact under Threshold TRA-b would remain significant and unavoidable after mitigation.

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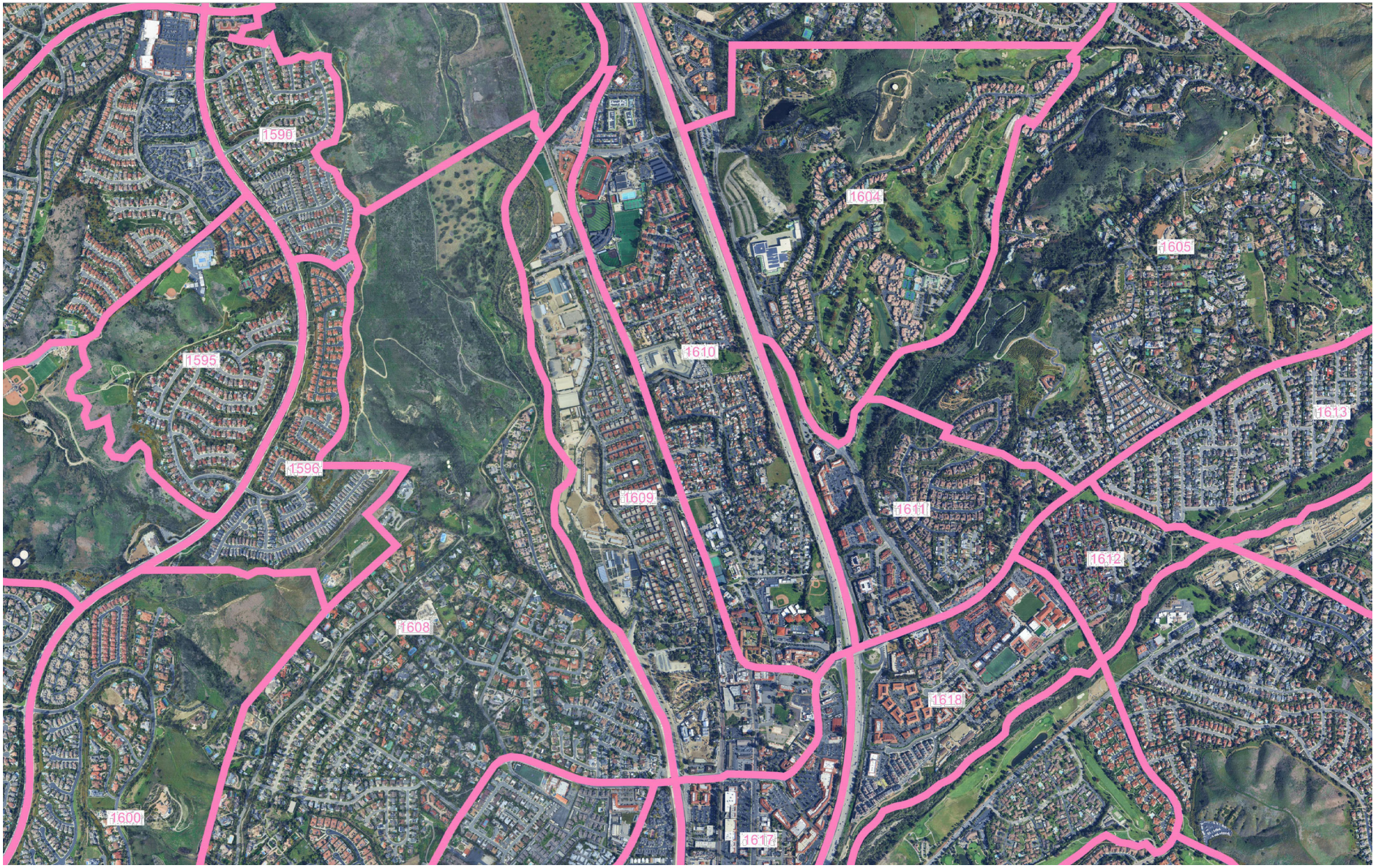

Harris & Associates

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Source: LLG Engineers, 2026.

Figure 4.10-1

TAZ Map

French Hotel Project Draft EIR