



ATTACHMENT D.11

VEHICLE MILES TRAVELED ASSESSMENT



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December 4, 2025

Mr. Paul Mayer
Santa Fe Flores LP
PO Box 903
Rancho Santa Fe, CA 92067

LLG Reference: 3-24-3940

Subject: Santa Fe Flores Townhomes VMT Assessment
San Marcos, California

Dear Mr. Mayer:

Linscott, Law & Greenspan, Engineers (LLG) has prepared this assessment of Vehicle Miles Traveled (VMT) for the Santa Fe Flores Townhomes project (“Project”). The Project site is located at 2966, 2972 and 2982 S. Santa Fe Avenue, on the northwest corner of the S. Santa Fe Avenue / N. Las Flores Drive intersection in the City of San Marcos. The Project proposes the development of 46 multi-family dwelling units. The Project’s site plan is shown on *Figure 1*.

This assessment has been prepared to evaluate the effects of the Project based on VMT, as proposed by the California Governor’s Office of Planning and Research (OPR) to implement California State Law Senate Bill (SB) 743 and subsequently adopted by the City of San Marcos in November 2020. The analysis methodology contained in this report utilizes the City of San Marcos’ latest *Transportation Impact Analysis Guidelines* (November 16, 2020).

VMT BACKGROUND

VMT is defined as the “amount and distance of automobile travel attributable to a project” per CEQA Guidelines Section 15064.3. VMT is a measure of the use and efficiency of the transportation network as well land uses in a region. VMT is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (roundtrip) travel and is estimated for a typical weekday for the purposes of measuring transportation impacts.

The potential transportation impacts of the proposed Project are based on VMT to satisfy the California Environmental Quality Act (CEQA) guidelines through SB 743. Public Resources Code section 20199, enacted pursuant to SB 743, identifies VMT as

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an appropriate metric for measuring transportation impacts along with the elimination of auto delay/Level of service (LOS) for CEQA purposes statewide.

VMT ASSESSMENT

Based on the City of San Marcos *Transportation Impact Analysis Guidelines*, 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.

1. Small Projects (less than 110 daily vehicle trips)
2. Affordable Housing (100% deed restricted)
3. Local Serving Retail and Public Facilities (50,000 square feet gross floor area or less)
4. Adjacency to High-Quality Transit
5. 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

Per SANDAG's online residential VMT map, the Project site is located within Census Tract 200.18 as shown in **Figure 2**. The VMT per capita of this Census Tract is 15.4 VMT, which is 81.2% of the SANDAG regional average of 19.0 VMT per capita. Therefore, screening criteria number five (5) listed above is applicable. As such, the Project can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis.

Mr. Paul Mayer
December 4, 2025
Page 3



Please call me with any questions.

Sincerely,

Linscott, Law & Greenspan, Engineers

A handwritten signature in blue ink, appearing to read "J Boarman", is positioned below the company name.

John Boarman, P.E.
Principal
California Registration: C50033

cc: File

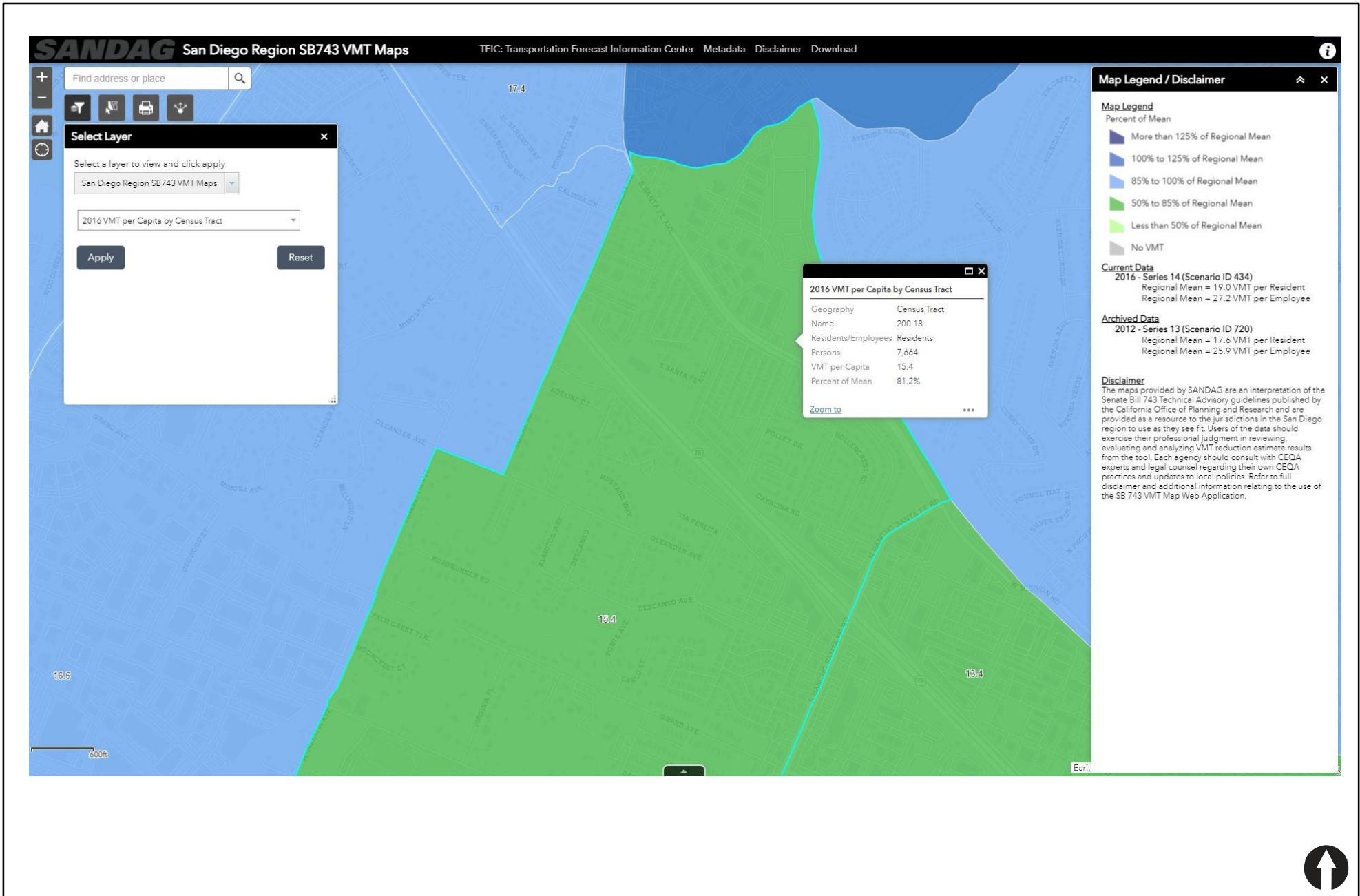


Figure 2

SANDAG Screening Map Results

SANTA FE FLORES TOWNHOMES