



## Technical Memorandum

To: Matthew Edgeworth, City of Encinitas

From: Marc Mizuta, Mizuta Traffic Consulting

Date: September 10, 2024

09/10/24

Re: Trip Generation and VMT Screening Analysis for the Proposed Santa Fe Multi-Family Project

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Mizuta Traffic Consulting (MTC) has prepared this memo summarizing the estimated trip generation and determining if the proposed Santa Fe Multi-Family project (herein referred to as “the Project”) located at 845 Santa Fe Drive in Encinitas, CA would result in any significant transportation impacts. Senate Bill 743 (SB 743) was approved in 2013 and changes the way transportation impacts are measured under the California Environmental Quality Act (CEQA). The Office of Planning and Research (OPR) has recommended the use of vehicle miles travelled (VMT) as the required metric to replace the automobile delay-based LOS.

The Project was deemed completed prior to the City’s adoption of the current *City of Encinitas SB 743 VMT Analysis Guidelines* on November 8, 2023. As a result, the VMT assessment was prepared for the Project based on the criteria outlined in the *ITE Guidelines for Transportation Impact Studies (TIS) in the San Diego Region, May 2019 (San Diego ITE Guidelines)*.

### PROJECT DESCRIPTION

The Project is located at 845 Santa Fe Drive and bounded by Santa Fe Drive to the north, Munevar Road to the south, a tennis club to the east, and residential commercial/residential lots to the west. The existing site currently consists of a church and school. The Project will redevelop the site to include 35 single family residential units and 16 multi-family dwelling units.

### TRIP GENERATION

The existing site currently contains a church and a daycare. As part of the Project, the existing site would be redeveloped to include 35 single family residential units and 16 multi-family dwelling units. Trip generation rates for the Project were developed utilizing rates from the *SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002*. The Project is estimated to generate 478 daily trips with 39 AM peak-hour trips and 48 PM peak-hour trips at the project driveway. Additional details on the trip generation are included in the *Local Transportation Assessment (LTA), dated June 2024*.



**SCREENING CRITERIA**

The basic process for completing a VMT analysis is to compare the project’s estimated VMT/capita or VMT/employee to average values on a regional, city-wide, or community basis. The target is to achieve a project VMT/employee or VMT/capita that is 85 percent of less of the appropriate average. However, a VMT analysis is not required if it satisfies certain criteria as it would be presumed that the project would not have a significant VMT impact.

**MINIMUM PROJECT SIZE**

The OPR Technical Advisory recommended that projects be subjected to different levels of VMT analysis, depending on the size of the project and whether the project is consistent with the local jurisdiction’s General Plan or Community Plan. Projects that are consistent with the General Plan or Community Plan are also considered to be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). **Table 1** summarizes the criteria for the minimum project size.

**Table 1: Minimum Project Size Criteria**

Criteria	ADT	Level of Analysis	Criteria Met?
Projects Inconsistent with General Plan/Community Plan	0 - 500	VMT analysis not needed/VMT impacts presumed insignificant	n/a
	> 500	VMT analysis recommended	n/a
Projects Consistent with General Plan/Community Plan	0 – 1,000	VMT analysis not needed/VMT impacts presumed insignificant	Yes
	> 1,000	VMT analysis recommended	n/a

Note:  
Highlighted row indicates the criteria that the project satisfies.

As shown in the table, the Project is consistent with the General Plan and would generate less than 1,000 daily trips. As a result, a VMT analysis is not required and it is presumed that there are no VMT impacts.

**CONCLUSION**

The Project is consistent with the General Plan and is estimated to generate less than 1,000 daily trips. As a result, it is presumed that the Project would result in less than a significant impact and no additional VMT analysis is required or recommended.

# ATTACHMENTS

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- VMT Screening Threshold




**GUIDELINES FOR TRANSPORTATION IMPACT STUDIES  
IN THE SAN DIEGO REGION**

**May 2019**

### **Projects Inconsistent with General Plan or Community Plan**

<u>ADT</u>	<u>Level of Analysis</u>
0 – 500	VMT Analysis Not Needed/VMT Impacts Presumed Less Than Significant
500 and Greater	VMT Analysis Recommended

### **Projects Consistent with General Plan or Community Plan**



<u>ADT</u>	<u>Level of Analysis</u>
0 – 1,000	VMT Analysis Not Needed/VMT Impacts Presumed Less Than Significant
1,000 and Greater	VMT Analysis Recommended

The advantage of this alternative for determining minimum project size is that it is based on the engineering judgment of professionals who are experts in determining the effect of projects on the transportation system. It has been used successfully for over 19 years in the San Diego region and has received wide acceptance from the transportation profession, decision makers, and the public. Transportation engineers and planners who support this alternative for determining minimum project size consider it to be equally valid for the current LOS-based transportation analyses as well as the new VMT-based analyses taking effect on July 1, 2020.

### **Alternative 2 – Minimum Project Size Based on Statewide Guidance**

Under this alternative, the minimum project size for VMT analysis would be based on statewide guidance provided by OPR. In OPR's technical advisory, the minimum project size is based a categorical exemption in CEQA that allows expansion of existing structures under certain circumstances. On page 12 of the December 2018 technical advisory, footnote 19, the following language describes the situation: "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. [CEQA Guidelines, § 15301, subd. (e)(2).]"

OPR uses a general office building as the appropriate project type for the determination of minimum project size based on the exemption described above. Typical ITE trip generation rates are then applied to a 10,000 square-foot general office building which yields a minimum project size based on 110 daily trips.

If this alternative is used in the San Diego region, it is recommended that the use of regional or local trip generation rates be considered in addition to the typical trip generation rate used by OPR. For example, using the SANDAG trip generation manual (Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002), a standard commercial office would generate 20 daily trips per 1,000 square feet. Therefore, a 10,000 square-foot office would be expected to generate 200 daily trips and projects that generate less than 200 daily trips would not require a VMT analysis and would be presumed to have less than significant VMT impacts.

One advantage of this alternative is that it is based on statewide guidance with a reference to CEQA provisions. A second advantage is that it was developed in consideration of VMT as the performance measure for the determination of the transportation impacts of land development projects.