APPENDIX I1 VEHICLE MILES TRAVELED SCREENING



Ms. Katherine Stefani Calaveras County Planning Department 891 Mountain Ranch Road, Building E San Andreas, California 95249 January 25, 2024

Subject: Vehicle Miles Traveled Screening

Proposed Hotel and Restaurant Development

236-300 East St. Charles Street

San Andreas, California

Dear Ms. Stefani:

INTRODUCTION

This report presents the results of a vehicle miles traveled (VMT) screening for the subject project.

PROJECT DESCRIPTION

The project includes a four-story, 79-room hotel and a 2,527-square-foot restaurant (with no drive through). The project site (APN 042-030-014-000 and 042-031-017-000) covers approximately 4.156 gross acres on the west side of St. Charles Street with site access proposed via one driveway connecting to St. Charles Street approximately 300 feet south of Treat Avenue.

A vicinity map is presented in the attached Figure 1, Vicinity Map, and a site plan is presented in Figure 2, Site Plan.

TRIP GENERATION

Data provided in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition, was used to estimate the number of trips anticipated to be generated by the Project.

Data presented in the ITE *Trip Generation Handbook*, 3rd Edition dated September 2017 (TGH) contains information suggesting that the Project would generate internal trips (sometimes referred to as "internally-captured trips"). Estimation of the number of internal trips accounts for the interaction between the various individual land uses assumed for the trip generation calculations. A more complete description of internal trips is presented in the TGH. An example of an internal trip for the proposed Project is a person who stays at the hotel and eats in the restaurant without exiting the site. A maximum internal capture rate of five percent was assumed for the use generating fewer trips (the restaurant). The trips generated by the restaurant were multiplied by five percent to estimate the internal capture.

Table 1 presents the vehicle trip generation estimates for the Project utilizing ITE Land Use 310 (Hotel) and ITE Land Use 932 (High-Turnover (Sit-Down) Restaurant).

<u> Table 1</u>								
Project Trip	Generation	Estimate						

Land Use	Units	Daily		A.M. Peak Hour			P.M. Peak Hour						
		Rate	Total	Rate	In:Out	In	Out	Total	Rate	In:Out	In	Out	Total
310	79 rooms	7.99	632	0.46	56:44	21	16	37	0.59	51:49	24	23	47
932	2,527 sq. ft.	107.20	271	9.57	55:45	14	11	25	9.05	61:39	14	9	23
Internal Capture			-13			-1	0	-1			-1	0	-1
TOTALS:			890			34	27	61			37	32	69

Reference: Trip Generation Manual, 11th Edition, Institute of Transportation Engineers 2021

Rates are reported in trips per room for the hotel and trips per 1,000 square feet of building area for the restaurant.

VEHICLE MILES TRAVELED (VMT)

Senate Bill 743 (Steinberg, 2013), which was codified in California Public Resources Code § 21099, required changes to the guidelines implementing the California Environmental Quality Act (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 1500, et seq.) as to the analysis of transportation impacts. Per Public Resources Code § 21099(b)(1):

"The Office of Planning and Research shall prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, the office shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section."

In January 2019, the Natural Resources Agency certified the Office of Planning and Research's (OPR) proposed revisions, which resulted in the creation of Section 15064.3 of the CEQA Guidelines. Section 15064.3(a) describes its purpose as:

"This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."

OPR created a Technical Advisory (December 2018) (TA)¹ as guidance for evaluating vehicle miles traveled (VMT) impacts. The TA is incorporated herein by reference. VMT significance

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¹ https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

thresholds are recommended by OPR beginning on page 8 of the TA. On page 12 of the TA, OPR states:

"Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

The TA generally identifies three types of development projects that contribute most substantially to VMT: residential, office, and retail. The proposed restaurant is expected to more closely resemble a retail-type project. With respect to retail projects, on pages 16 and 17 of the TA, OPR states:

"Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.

"By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

"Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT."

With respect to mixed-use projects, on page 17 of the TA, OPR states:

"Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment."

The restaurant portion of the Project is substantially smaller than 50,000 square feet in building area (the building area proposed is 2,527 square feet) and is situated to attract customers from the

adjacent roadways, nearby residences and hotels, and other existing nearby complementary land uses, making the project a local-serving retail use. Therefore, it is suggested that the TA itself and the project description together provide the necessary substantial evidence for the County to presume a less-than-significant transportation impact for the restaurant portion of the Project.

The TA does not address the subject of hotels, vacations, recreational activities, business trips, or types of trips associated with the activities of a hotel. The proposed hotel will primarily generate two types of trips: 1) work-based trips (primarily employees), 2) guests of the hotel.

With respect to the employees that will work at the proposed hotel, the number of employee trips per day is expected to be far less than 110 per day (there will be approximately 15 to 17 employees per day). Therefore, it can be concluded that the Project's VMT impact with respect to hotel employee trips will be less than significant.

With respect to VMT generated by hotel guests, the hotel will provide an additional opportunity in the existing urban fabric to reduce trip lengths in a manner similar to that suggested in the TA for retail projects. The proposed hotel will provide lodging for local attractions, businesses, and events, offering a local-serving lodging opportunity that can reduce the number of miles visitors must travel between the lodging and the attraction or event. It should be noted that the proposed hotel is essentially an alternate residence for visitors during their stay, so the VMT that would have been generated by visitor's at their primary residence will not occur at the primary residence during their stay at the hotel. If it is presumed that business and vacation travel is a given for all residences, as may be inferred by the lack of reference to vacationing and tourism in the TA, then the VMT generated while guests stay at the proposed hotel may be assumed to be offset by the lack of trips occurring at their primary residence. Therefore, with respect to trips generated by guests of the hotel, the Project's VMT impact may be presumed to be less than significant.

CONCLUSION

It is the conclusion of this screening analysis that each portion of the proposed Project may be presumed to cause a less-than-significant transportation impact.

Thank you for the opportunity to perform the analyses presented herein. Please feel free to contact our office if you have any questions.

PETERS ENGINEERING GROUP

John Rowland, PE, TE

Attachments: Figures 1 and 2

cc: Mr. Robert Reicher, UltraSystems Environmental



