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February 01, 2024

Rodrick H. Hawkins PE, PLS, QSD  
Hawkins & Associates Engineering  
436 Mitchell Rd  
Modesto, CA 95354

Subject: Woodspring Suites Extended Stay Hotel - Project Vehicle Miles Traveled Analysis  
Memorandum

Dear Rodrick:

LSA has prepared this Vehicle Miles Traveled (VMT) Analysis Memorandum (Memo) for the proposed Woodspring Suites Extended Stay Hotel project to be located in the northeast quadrant of Chippendale Drive and Date Avenue in the County of Sacramento (County). The project proposes development of the currently empty site into a 4-story, 122-room extended stay hotel.

## BACKGROUND

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) guidelines for use. Among the changes to the guidelines was removal of vehicle delay and level of service from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project generated VMT.

The County adopted its "Transportation Analysis Guidelines – County of Sacramento" September 10, 2020 (guidelines) to provide guidance for land use and transportation project VMT analysis. The guidelines included hotel land use as regional public facilities/services and recommend use of absolute VMT comparison between "without" and "with" project scenarios to determine the project's VMT impact. The project is considered to have a less than significant VMT impact if there is no net increase ("with project" – "without project") in total VMT with inclusion of the project.

Typically, project VMT is estimated using the regional travel demand model - Sacramento Area Council of Governments (SACOG) Activity Based Model (SACSIM). However, the guidelines recommend use of travel demand model only for "large projects" (e.g., greater than 3,500 daily trips) and alternative (off-model) methodologies can be used for smaller projects. The project is an extended stay hotel and Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, doesn't include trip rate for the project category. As described below in detail, extended stay hotels are anticipated to have a lower trip rate compared to typical hotels with daily turnover. However, to provide a conservative estimate, ITE land use category Hotel (LU 310) was used to estimate daily project trip generation. Based on ITE trip generation rate for hotel category, the project would generate approximately 975 daily trips which is less than 3,500 threshold from the

guidelines. Therefore, in coordination with the County staff it was determined a qualitative approach would be appropriate to evaluate the project's VMT impact.

### Project Screening Determination

The guidelines provide multiple screening criteria for land use projects based on project trip generation and project land use type. The project was compared with the screening criteria established guidelines to check if the project can be screened out. Following is a brief description about the project in relation with the project screening criteria:

1. **Small Projects:** Based on the guidelines, land use projects that generate less than 237 average daily traffic (ADT) can be screened out of a detailed VMT analysis. The project is an extended stay all suites hotel. Daily project trip generation for the project was estimated using ITE Trip Generation Manual, 11<sup>th</sup> Edition. The project is estimated to generate 975 ADT using ITE land use category "310 – Hotel" which is greater than 237 ADT. Therefore, the project cannot be screened out a detailed VMT analysis.
2. **Local-Serving Retail:** The project land use is an extended stay hotel which is categorized as public facility/service based on the guidelines. Therefore, this criterion is not applicable for the project.
3. **Local-Serving Public Facilities/Services:** The guidelines categorized hotel/motel as regional public facilities/service or recreational use. However, the guidelines also acknowledge that the categorization of land uses into local-serving vs. regional-serving is for illustrative purposes only. Determination of a project as local or regional serving is left to the discretion of the approving agency based on project's expected VMT characteristics. While the generic land use of the project is classified as hotel, the project is an extended stay hotel that has a different market segment of customers compared to regular hotels with daily turnover. Extended stay hotel guests aim to select a centrally located accommodation that aligns with their daily schedules, intending to reduce the distance traveled (VMT) as they strive to optimize convenience. Therefore, the project can be considered local-serving public facility/service or recreational use.
4. **Projects in VMT-Efficient Areas:** Land use projects located in a VMT efficient area based on an approved screening map can be screened out of detailed VMT analysis. Based on the guidelines, this screening criterion is applicable for residential, office/business professional employment, industrial employment land uses only. The project is hotel land use which is categorized as regional public facility in the guidelines and as such this screening criterion is not applicable to the project. However, as indicated above this is an extended hotel that has different trip characteristics than a typical hotel and therefore, a screening analysis was conducted that is described in detail below.
5. **Projects Near Transit Stations:** Projects located within ½ a mile of an existing major transit stop or in a high-quality transit corridor and meet other established criteria for Floor Area Ratio (FAR), parking, affordable housing, and active transportation infrastructure impacts can be screened out of a detailed VMT analysis. The project is not located within ½ a mile of

major transit stop and is not located in high-quality transit corridor, therefore the project cannot be screened out of a VMT analysis.

6. Affordable Residential Projects: The guidelines established screening criteria for affordable residential projects based on affordability, parking, transit access, and active transportation infrastructure impacts. The project is not an affordable residential land use and therefore, this criterion is not applicable for screening out of a VMT analysis.

As indicated above, the project cannot be screened out directly from a detailed VMT analysis. However, the guidelines provide discretion in determination of a project as local or regional serving public facility/recreational use depending on project's expected VMT characteristics and also allows for a qualitative VMT analysis of the project. Therefore, a qualitative analysis was conducted to determine the expected VMT characteristics of the project.

## VMT ANALYSIS

As previously mentioned, in coordination with County staff, it was determined that a qualitative VMT analysis would be appropriate to determine project's VMT impact. Following is a detail description of project and its trip / VMT characteristics.

- Extended stay facilities (project land use) can be considered as short term and affordable housing projects given their low cost. Figure 1 depicts location of the project and existing extended stay facilities in the area. According to the available information/research and shown in Figure 1, the project area has limited extended stay facilities. While there are couple of extended stay facilities in the vicinity, only one of the extended facilities can be considered economy class which limits the affordability for market segment usually served by Woodspring Suites. The nearest facility under a similar affordable class is located approximately 8 miles from this project. Therefore, the project will help in reducing trip lengths and hence VMT for customers looking to reside in proximity to their temporary job location. Specifically, it should be noted that there are no Woodspring Suites in the entire County to serve its loyalty customers. In summary, the project is poised to address and fulfill a need in the area and is anticipated to reduce overall regional VMT.
- Woodspring Suites (project hotel brand) has compiled nationwide data regarding their typical customer stays. As can be seen in Table A below, more than 80% of their customers stays are more than a week and more than 30% of customer stays are greater than 90 days. Based on the average duration of stay, it can be inferred that travel characteristics of extended stay customers vary significantly from customers of a typical regional hotel/motel with daily turnover. Extended stays may be considered and evaluated as a short-term housing project as the customer trip behavior will represent that of a typical household rather than a visitor (hotel customers). These customers would typically select an extended stay facility that would be in proximity to their temporary employment location. To that extent, if the project can be evaluated as a residential project, the project is in a VMT efficient area (VMT per capita - the metric for residential projects), as shown in Figure 2, and therefore can be screened out of a VMT analysis.

- Considering the duration of the stay, the occupation of the customer (as observed from data), and the affordability of extended stays, it can be concluded that customers in such facilities aim to optimize proximity of their accommodations to their temporary workplace. Additionally, taking into account the economic status, it can be inferred that customers seek to minimize travel distance/expenses. These attributes may not reflect for hotel land uses with daily turn over.
- Based on project operational statement, the project will have nine full time employees with largest shift period with five employees for 122 hotel rooms. The employee to room ratio for the project is much lower than a typical regional hotel/motel. For example, based on ITE Trip Generation Manual, a typical hotel with 122 rooms would approximately have a total of 61 employees (using ITE LU code 310 - Hotel) which is much higher than the project. If the project trips/VMT can be considered to a typical household as described above, additional VMT due to project employees should be considered in VMT evaluation. However, the project is also located in a low VMT efficient area based on County’s VMT per employee screening map as shown in Figure 3. Therefore, employee component of the project can be screened out of a detailed VMT analysis.
- Also based on project operational statement, the project will not include any other facilities such as bar, restaurant, retail, or conference room facilities. Therefore, the project will not have any additional trips or VMT other than extended stay customers or employees which have been accounted in the above analysis.

**CONCLUSION**

As shown above, the trips and VMT characteristics from the project (extended stays) are similar to residential trips/VMT given the average duration of stays. Similarly, the project has considerably lower employee/room ratio given the extended duration of each stay which results in nominal employee trips/VMT. Also, according to the County’s screening maps, the project is in VMT efficient areas for both VMT per capita and VMT per employee. Additionally, the project is anticipated to fill a gap for extended stays in the area and provide affordable short-term housing to its customers. Based on above qualitative assessment, it can be concluded that the project will have a less than significant VMT impact.

If you have any questions, please do not hesitate to contact me at (951) 781-9310 or [Ambarish.Mukherjee@lsa.net](mailto:Ambarish.Mukherjee@lsa.net).

Sincerely,

LSA  
  
 Ambarish Mukherjee, AICP, PE  
 Principal



Attachments:

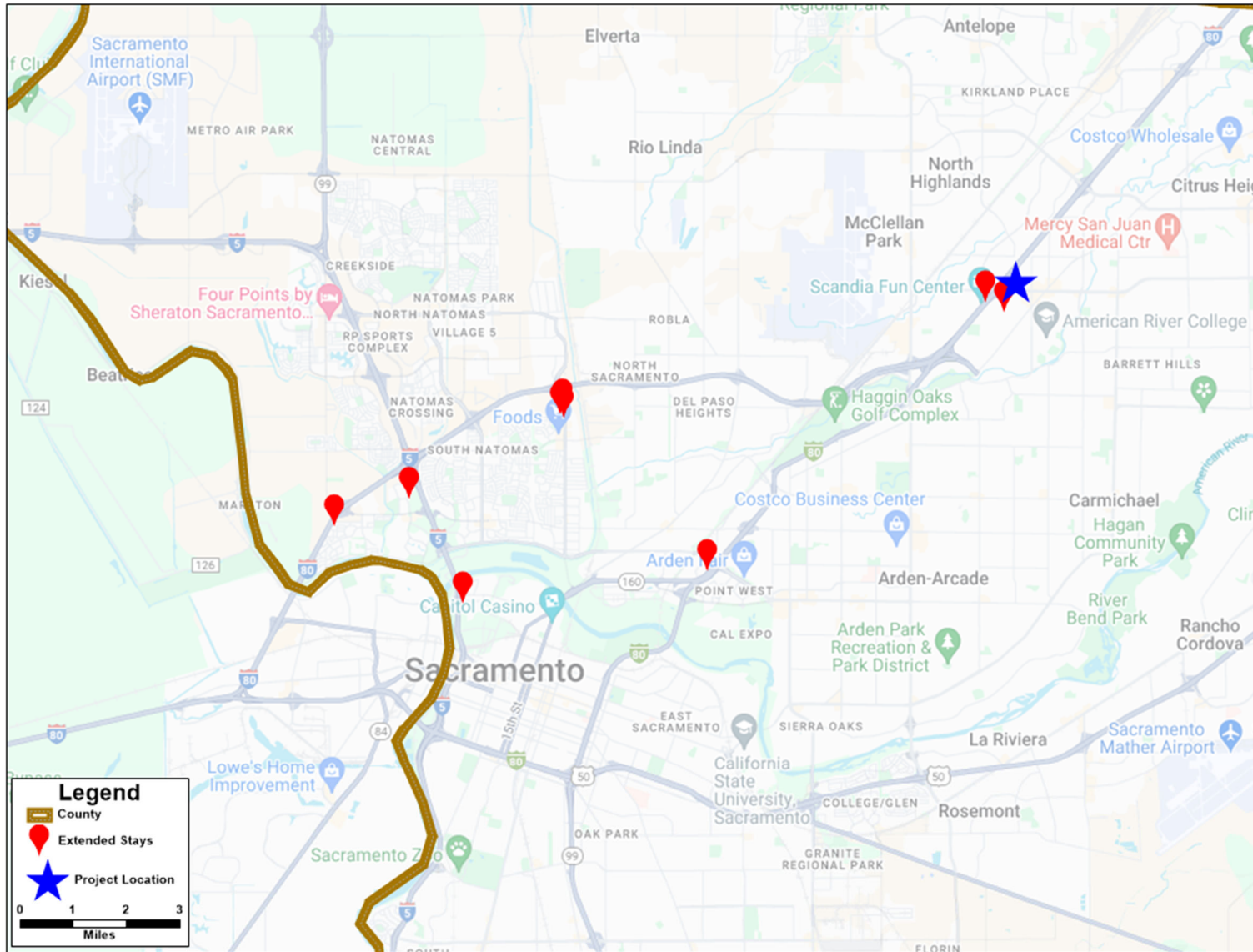
Figure 1: Project location and existing extended stay hotels

Figure 2: Project Area VMT per capita screening map

Figure 3: Project Area VMT per employee screening map

Table A: Typical customers and duration of stay – Woodspring Suites (nationwide)

Figure 1: Project location and existing extended stay hotels



**Figure 2: Project Area VMT per capita screening map**



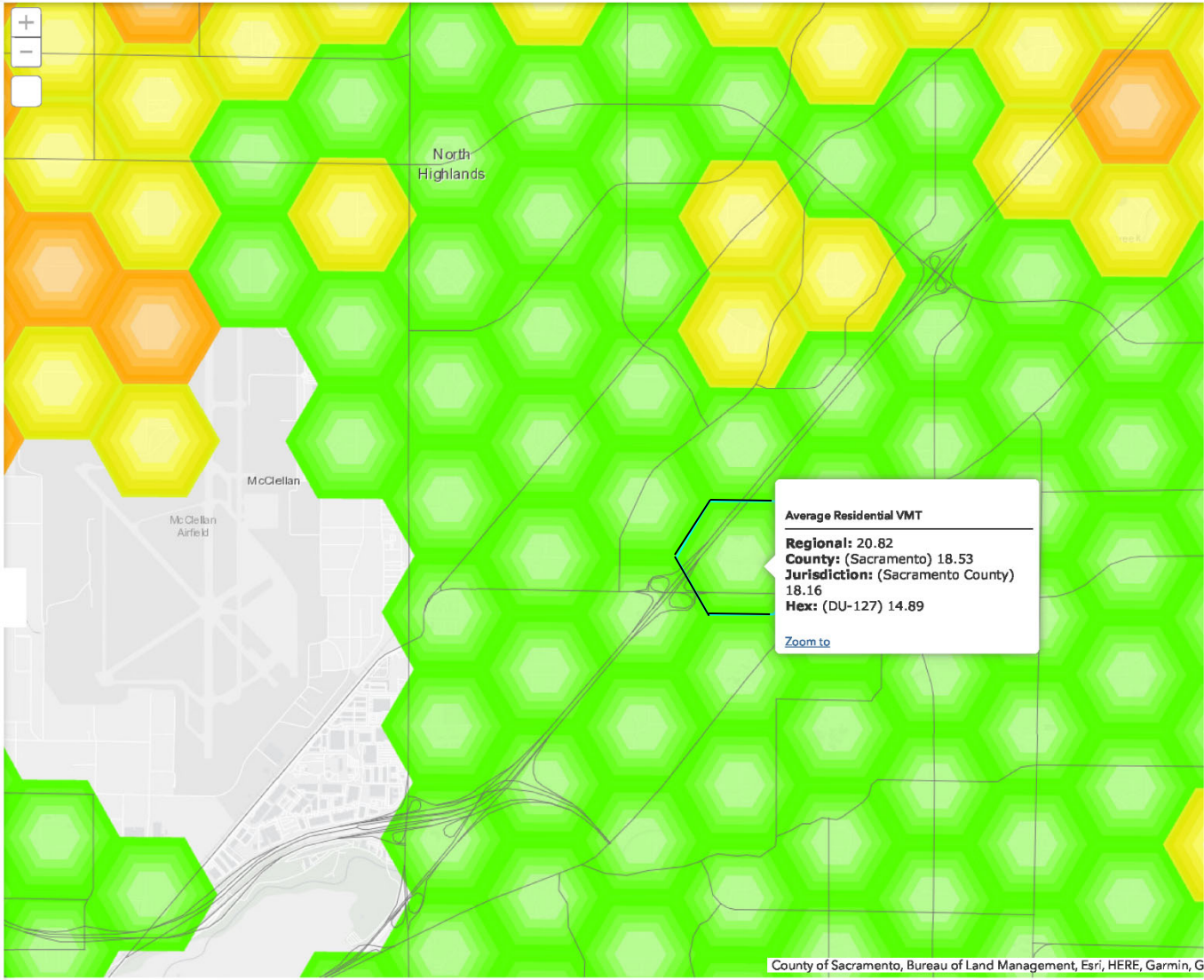
For RESIDENTIAL projects, threshold is defined as total household VMT per capita achieving 15% of reduction comparing to regional (or any appropriate sub-area) average. The map uses HEX geography. Residential VMT per capita per HEX is calculated by tallying all household VMTs, including VMT traveling outside the region, generated by the residents living at the HEX and divided by the total population in the HEX. Note that these maps represent an example of just one of the many criteria projects are subject to when analyzing transportation impacts under CEQA, specific to SB 743. Additionally, the [Draft CEQA Guidelines for implementing SB 743](#) and the technical guidance are still DRAFT. These draft maps are provided for information purposes only and are subject to change. SACOG will make changes as guidelines are updated and as SACOG data is updated.

For questions about the maps, please send an email to [sacsim@sacog.org](mailto:sacsim@sacog.org). To request underlying GIS layer, please fill in and sign the [Data Request Form](#). For more information about SACOG's supports to implement SB743, please visit <https://www.sacog.org/sb-743-technical-assistance>

Residential VMT (including Outside-the-Region VMT by SACOG residents)(Updated 5/26/21)

Average Residential VMT per Capita

- <= 50% of Regional Average
- <= 50%-85% of Regional Average
- <= 85%-100% of Regional Average
- <= 100%-115% of Regional Average
- <= 115%-150% of Regional Average
- > 150% of Regional Average



**Figure 3: Project Area VMT per employee screening map**

For an employment-generating project (labeled "office project" in OPR Technical Advisory), the threshold is defined as achieving a 15% of reduction in the regional average work VMT per Job. The map uses HEX geography. Work VMT per job per HEX is calculated by tallying all work VMTs, including work VMT made by both internal and external workers traveling to the Hex to work, and divided by the total jobs in the HEX.







Note that these maps represent an example of just one of the many criteria projects are subject to when analyzing transportation impacts under CEQA, specific to SB 743. Additionally, the [Draft CEQA Guidelines for implementing SB 743](#) and the technical guidance are still DRAFT. These draft maps are provided for information purposes only and are subject to change. SACOG will make changes as guidelines are updated and as SACOG data is updated.

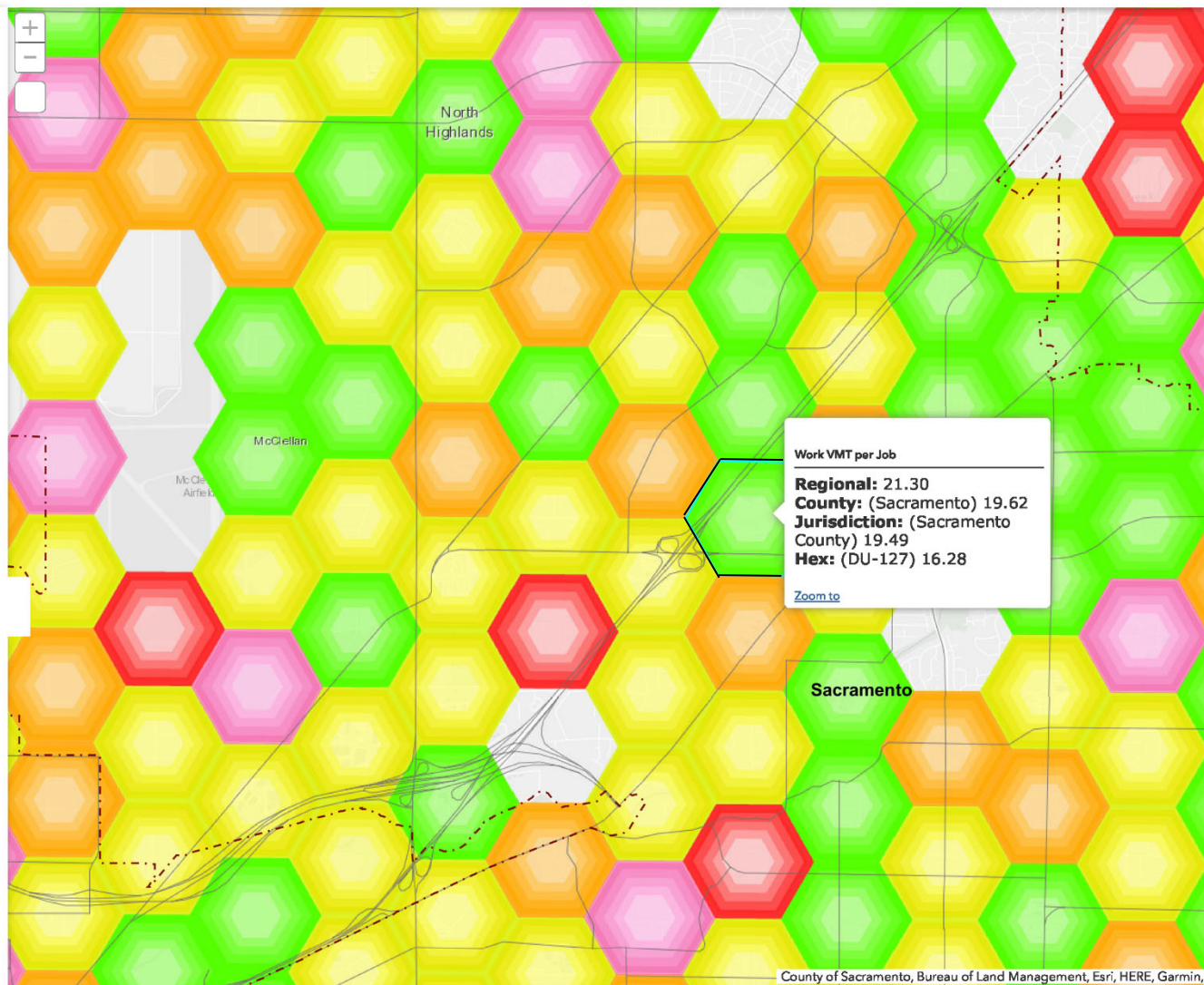
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Work VMT (Including work VMT made by external workers) (Updated 5/26/2021)

Work VMT Per Job

-  <= 50% of Regional Average
-  <= 50%-85% of Regional Average
-  <= 85%-100% of Regional Average
-  <= 100%-115% of Regional Average
-  <= 115%-150% of Regional Average
-  > 150% of Regional Average



**Table A - Typical customers and duration of stay – Woodspring Suites (nationwide)**

<b>Typical Clientle</b>	<b>Typical duration of stay (nights)</b>	<b>Percentage of Total Stays (%)</b>
Leisure	1-6	18.9%
Travelling nurses, construction workers, consultants	7-29	29.5%
Travelling nurses, construction workers, consultants	30-90	20.3%
Long term construction, consultants, people in transition	90+	31.3%