



May 19, 2021

Ms. Theresa Bradbury  
LOE Firehouse  
708 Gravenstein Highway North #287  
Sebastopol, CA 95472

## **Addendum to the *Traffic Impact Study for the Apothevert Dispensary***

Dear Ms. Bradbury;

As requested, W-Trans has completed this Addendum to the *Traffic Impact Study for the Apothevert Dispensary*, July 24, 2018 (TIS). It is noted that the project sponsor has now changed, and the project is now called "LOE Firehouse" rather than Apothevert (File Number UPC17-0094). The specific issues identified that are addressed include the addition of an analysis of Vehicle Miles Traveled (VMT) and an update in the project description to match what is currently proposed. All other information in the 2018 TIS remains valid for the project as currently proposed.

### **VMT Analysis**

At the time of the traffic analysis the use of VMT as a metric for evaluating traffic impacts under the California Environmental Quality Act (CEQA) had been established but was not required until July 1, 2020. The traffic impact study therefore did not include an analysis of VMT. The following text is new information that results in an additional section of the report that would come after "Trip Distribution" and before "Intersection Operation" on Page 14 of the TIS.

### **VMT**

Senate Bill (SB) 743 established a change in the metric to be applied to determining transportation impacts associated with development projects. Rather than the delay-based criteria associated with a Level of Service analysis, the increase in vehicle miles traveled (VMT) as a result of a project is now the basis for determining environmental impacts. Because the County of Sonoma has not yet adopted standards of significance for evaluating VMT, guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018, was used. OPR's guidance for retail land uses, which the proposed dispensary would be classified as, were applied.

The OPR Technical Advisory indicates that retail projects should generally be analyzed by examining total VMT, with an increase in total regional VMT being considered a significant impact. In the Technical Advisory section outlining project screening, OPR indicates that *local-serving* retail may be presumed to have a less than significant VMT impact and can generally be screened from further VMT analysis. OPR based this presumption on substantial research demonstrating that adding local-serving retail uses typically improves destination accessibility to customers, often reducing trip distances (i.e., the, "miles" in vehicle miles traveled) since customers need to travel shorter distances than they previously did. The total demand for retail in a region also tends to hold steady; adding new local-serving retail typically shifts trips away from another use rather than adding entirely new shopping trips to the region. OPR cites a size of 50,000 square feet or greater as being a potential indicator of regional-serving retail (versus local-serving) that would typically require a quantitative VMT analysis.

Given the proposed dispensary's location as well as the plans to include delivery service, further consideration was given to how the use could affect regional travel. A key component of this effort is to assess how far customers in surrounding areas must currently drive to reach a dispensary. As there are currently no dispensaries in or near the City of Sonoma, customers from the lower Sonoma Valley, including the City of Sonoma, would need to drive a substantially shorter distance to reach a dispensary with the proposed project than is currently the case. Further, the delivery service would result in one round trip for numerous deliveries rather than individual trips for each customer. These operational considerations would both be expected to lead to a reduction in regional VMT. Based on this finding, and consistent with OPR's guidance on local-serving retail, the project is expected to have a less-than-significant VMT impact.

## Project Description

The project as described in the TIS was assumed to operate from 10:00 a.m. to 7:00 p.m. and have nine employees on a typical daily basis, with a maximum of five employees on-site at any one time. It is understood that this has changed in that some operation from 7:00 a.m. to 10:00 a.m. is now being requested. The following discussion amends or supplements information in the TIS as appropriate.

Consideration was given to potential effects on traffic associated with the potential opening prior to 9:00 a.m. and/or arrival of employees and vendors prior to 9:00 a.m., thereby resulting in the generation of trips during the morning peak hour. As shown in Table 6, which supersedes the version of the same table in the traffic study, and assuming that the store would be open during the morning peak hour, the standard trip generation rate for the a.m. peak hour is less than half that for the p.m. peak hour, so the number of added trips would be considerably less for the a.m. peak hour than the p.m. peak hour. Further, operation during the morning peak hour is traditionally better than that during the evening peak hour; the critical time for traffic operation is normally the p.m. peak hour.

**Table 6 – Trip Generation Summary (REVISED)**

Land Use	Units	Daily		Weekday AM Peak Hour			Weekday PM Peak Hour			Weekend PM Peak Hour		
		Rate	Trips	Rate	Trips	In:Out	Rate	Trips	In:Out	Rate	Trips	In:Out
<b>Existing</b>												
Small Office Bldg	1.891 ksf	16.19	31	1.92	4	3:1	2.45	5	1:4	0.40	1	0:1
MF Housing (Low-Rise)	1 du	7.32	7	0.46	0	0:0	0.56	1	1:0	0.70	1	0:1
<b>Sub-total (Existing)</b>			<b>38</b>		<b>4</b>	<b>3:1</b>		<b>6</b>	<b>2:4</b>		<b>2</b>	<b>0:2</b>
<b>Proposed Project</b>												
Marijuana Disp	1.891 ksf	154.0*	291	10.44	20	11:9	21.83	41	21:20	36.43	69	34:35
Gen'l Light Ind	1.956 ksf	4.96	10	0.70	1	1:0	0.63	1	0:1	0.41	1	0:1
<b>Sub-total (Proposed)</b>			<b>301</b>		<b>21</b>	<b>12:9</b>		<b>42</b>	<b>21:21</b>		<b>70</b>	<b>34:36</b>
<b>Net Increase in Trips</b>			<b>263</b>		<b>17</b>	<b>9:8</b>		<b>36</b>	<b>19:17</b>		<b>68</b>	<b>34:34</b>

Note: ksf = 1,000 square feet; du = dwelling unit; \* = ITE Rate with two outliers removed

Because the system would reasonably be expected to operate better during the morning versus the evening, the trip generation for the use would be much lower during the morning compared to the evening, and the project is anticipated to cause nominal changes to operation during the evening peak hour that result in no adverse effects on operation, it is reasonable to conclude that the project would similarly result in a nominal change with continued acceptable operation during the a.m. peak hour.

The potential affect that the proposed delivery service would have on the trip generation was also considered. Normal operation of such a service would result in an employee arriving on-site, loading orders for multiple customers, and leaving to make the delivery run. Because one delivery trip replaces multiple customer trips, the implementation of a delivery service would be expected to reduce the total daily trip generation and have a beneficial impact on the site's VMT.

With the exception of the new information presented above, the analysis, conclusions and recommendations from the 2018 TIS remain valid. It is noted that while some time has passed since the preparation of that study, the COVID pandemic has had the effect of reducing traffic and changing patterns due to the number of jobs lost and people working from home. As a result, the operational analysis presented in the 2018 TIS likely represents higher volumes than are currently being experienced, providing a conservative assessment compared to what would be obtained if a new analysis based on current traffic counts was prepared.

We hope this additional information adequately addresses the project's potential VMT impacts as well as the changes in the project description and associated effect on the conclusions and findings of the traffic study. Thank you for giving us the opportunity to provide these services.

Sincerely,



Dalene J. Whitlock, PE, PTOE  
Senior Principal



DJW/djw/SOX644.L1

Copy to: Mr. John Lobro (via email at [john7777777@yahoo.com](mailto:john7777777@yahoo.com))