



May 12, 2021

Ms. Karen Kissler
 Alternatives East
 2300 Bethards Drive
 Santa Rosa, CA 95405

Response to the Appeal of the Alternatives East Project

Dear Ms. Kissler;

This letter serves as a response to the information and claims contained in the appeal letter filed by Ms. Elizabeth S. Hutton, dated April 5, 2021, and specifically to comments related to our trip generation estimate for the dispensary which are contained in section 2 of the letter.

Project Timeline and Summary of Documentation

Following is a timeline of our work on the project and a summary of the various iterations of the trip generation letter that were issued. Table 1 also summarizes the source of the data that was applied to estimate the project's peak hour trip generation and the resulting trip estimate in each version of the report.

Table 1 – Trip Generation Summary

Version	AM Peak Hour		PM Peak Hour	
	Source	New Trips	Source	New Trips
March 16, 2020 – Draft Trip Generation Estimate	Local	3	ITE	49
January 20, 2021 – Updated Draft Trip Generation Estimate	Local	3	ITE	46
February 16, 2021 – Final Trip Generation Estimate	Local	3	ITE	46
March 9, 2021 – Revised Final Trip Generation Estimate	Local	1	Local	45

Notes: ITE = Institute of Transportation Engineers; these rates were developed based on data collected in Colorado.
 Local = Rates developed based on data collected by W-Trans at dispensaries in the North Bay Area.

- March 16, 2020:** A draft version of the "Trip Generation Estimate for the Alternatives East Project" was issued for City staff to review, as is our practice prior to issuing a final version. The trip generation for the project was estimated using rates developed by the Institute of Transportation Engineers (ITE) for the daily and p.m. peak hour, while local data was relied upon for the a.m. peak hour since local dispensaries are not permitted to open for business until 9:00 a.m. so they generate few trips during the morning peak period, which is defined as being between the hours of 7:00 and 9:00 a.m. Note that as of March 2020, W-Trans had not yet collected daily trip generation data for local dispensaries. Application of daily and p.m. peak hour ITE rates and a.m. peak hour local rates resulted in an estimate of 572 new daily trips compared to the previous office use with three new trips during the morning peak hour and 49 new trips during the p.m. peak hour. Although trips were clearly defined as one-way in the "Trip Generation Estimate," in response to the appellant incorrectly applying this definition in the appeal letter, it should once again be clarified that trips are counted as one-way so 572 trips would be considered 286 round trips; 572 trips is not the same as 572 round trips. As noted in the "Trip Generation Estimate," because the project was expected to result in fewer than 50 new trips during either peak hour, a full traffic impact study (TIS) with an operational analysis was not required under the City's *Standard Guidance for the Preparation of Traffic Impact Analysis* and the project's effect on operation of the surrounding roadway network was considered acceptable. It is noted that the daily trip generation associated with a project is typically provided for information purposes only as the number of daily trips has no impact on whether or not a full TIS is necessary under the City's guidelines, nor is it typically used in any other way for an operational analysis.

- **January 20, 2021:** An updated draft version of the trip generation letter was issued for City staff to review which reflected removal of the originally proposed on-site consumption area and used the same rates as the March 16, 2020 version of the letter. Removal of the on-site consumption area resulted in a modest reduction to the trip generation estimate of 546 new daily trips with three new trips during the a.m. peak hour and 46 new trips during the p.m. peak hour. The project's anticipated trip generation remained below the threshold of 50 peak hour trips so a full TIS was still not required.
- **February 16, 2021:** The trip generation letter was finalized and submitted in anticipation of the hearing with no changes from the draft version of the letter dated January 20, 2021.
- **March 9, 2021:** While reviewing comments made by members of the public in advance of the hearing, many of which expressed concern over the daily trip generation potential of the project, it was noted that the rates used to estimate the daily trip generation had become outdated due to the time lapse that had occurred since the original draft letter was issued on March 16, 2020. In the time since the original draft was issued, we had expanded our trip generation database and developed local daily rates for dispensaries as well as refined peak hour rates based on a larger sample of datapoints so a revised final trip generation letter was issued using local rates for the daily estimate as well as both peak hours. These rates, which have recently been used for numerous other dispensary projects in the City of Santa Rosa, resulted in a trip generation estimate of 97 new daily trips with one new trip during the a.m. peak hour and 45 new trips during the p.m. peak hour.

As stated in the revised final letter, the substantial disparity between ITE and local daily rates is likely due to the fact that ITE data was collected shortly after recreational marijuana was legalized in Colorado so there was a heightened level of excitement associated with the newness of the industry and the resulting ITE rate reflects this elevated level of trip activity. As the industry has stabilized in the North Bay and more dispensaries have opened for business, customers have more options, so the trip generation of any single dispensary has decreased over time since the industry was first legalized. It should also be noted that although application of the new local rates resulted in a substantial reduction in the anticipated number of daily trips, the estimate for the critical a.m. and p.m. peak hours decreased by only two trips and one trip, respectively, so the project would be expected to result in fewer than 50 new peak hour trips whether either ITE rates or local rates are applied; therefore, a full TIS would not be required under either set of rates.

Response to Specific Comments

Many of the appellant's comments and concerns have been addressed through the above project summary; however, the following section serves to respond to specific claims made. Content from the appeal letter is shown in *italics* for ease of reference, followed by our response.

"When the Commission originally was to hear this matter on February 25, 2021, Ms. Kissler had solicited a Trip Generation Estimated dated February 16, 2021, which was included in the attachments for that meeting. That estimate projected 546 new round trips daily as the result of the proposed dispensary, which report took great pains to note it was based on Santa Rosa and Sonoma County data."

The Trip generation letter clearly states that trips are counted as one way so the 546 new daily trips anticipated initially would be equivalent to 273 round trips. Further, as explained in the February 16, 2021 letter, only the a.m. peak hour trips were estimated using local data in this estimate; the national standard ITE rates developed based on data collected in Colorado were used to estimate the number of daily and p.m. peak hour trips.

"In response, a mere two weeks later, Ms. Kissler emailed the Planner advising that in response to the undersigned's "concerns," she called the W-Trans engineer, Cameron Nye, and got a different estimate which she referenced as a decrease to 12 trips per day, down from Mr. Nye's original number of 546. That email and the attached email from Cameron Nye, are included in Attachment 12 to the Agenda for the March 25, 2021, hearing."

At no point was it ever reported by W-Trans that the project would be expected to result in 12 daily trips. As stated in the email from Mr. Nye to Ms. Kissler on March 1, 2021, it was explained that the original estimate of 546 new daily trips was based ITE data collected at sites in Colorado during the early years of such sales being legal, which was considered the best data available at the time the study was initiated. The email went on to say that W-Trans collected new local data in the time since the study was initiated and the data collection effort identified that local rates are consistent with those published by ITE for the p.m. peak hour, but are substantially lower over the course of an entire day. Based on local data, Mr. Nye estimated that the project would generate *about* 120 daily trips. It is important to note that this number did not take the existing office trips into consideration as he was simply reporting the total number of dispensary trips, not the net new trips. After accounting for the office trips that would cease with the project, the dispensary would be expected to result in 97 new daily trips, which is consistent with what was reported in the March 9, 2021 revised final letter.

Unbeknownst to appellants, after emailing Ms. Kissler, Mr. Nye prepared an "Updated Trip Generation Estimate" dated March 9, 2021, which was included in the agenda for the March 25, 2021, meeting. Without actually explaining why he now had information which he didn't have two weeks earlier, Mr. Nye again represented the previous estimate was based on Colorado data while the updated estimate was based on Santa Rosa and Sonoma County data, again without acknowledging the February 16, 2021 estimate made NO reference to Colorado.

The following language is provided verbatim from the February 16, 2021 letter.

"The anticipated daily and p.m. peak hour trip generations for the dispensary were estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 10th Edition, 2017 for "Marijuana Dispensary" (LU #882). Because ITE rates for "Marijuana Dispensary" were developed based on data collected at sites that mostly open for business during the morning commute period of 7:00 to 9:00 a.m. and dispensaries in the City of Santa Rosa are not allowed to open for business until after 9:00 a.m., custom a.m. peak hour trip generation rates specific to the City of Santa Rosa were developed based on data collected at two existing dispensaries in the City."

While the letter dated February 16, 2021 does not specifically state the data was from Colorado, it does clearly state that industry standard rates for the daily and p.m. peak hour were applied, while local data was used for the morning peak hour. During the course of reviewing public comments it was noted the local rates based on data collected after March 16, 2020 when the original draft was issued had been developed, so a revised final was issued on March 9, 2021 using the local daily and peak hour rates, which are now considered the best and most accurate information available.

It is again noted that local rates were used only for the a.m. peak hour initially and ITE rates were applied for the daily and p.m. peak hour estimates. As the ITE rates are based on data collected in Colorado references made to ITE rates also reflect Colorado data so may be considered as "Colorado rates" though they are published by ITE.

However, in his updated estimate, Mr. Nye came up with yet another number different both from his February 16, 2021 estimate and the estimate he emailed to Karen Kissler on March 1, 2021. This time he decided the project "would be expected to generate 97 new trips on a daily basis," thus reducing his estimate even further from the 120 he had come up with a week before and a whopping 92 percent drop from his original estimate of 546 three weeks earlier.

As mentioned previously, the email from Mr. Nye to Ms. Kissler reported an estimate of about 120 total daily trips for the dispensary, not new trips. With an estimate of 119 daily trips for Alternatives East (or *about* 120), after deducting the 22 trips for the previous office use, the project has an estimated total of 97 new daily trips, as indicated in the trip generation table. The comment does not differentiate between the project's total trip generation and net new trips, yet both numbers are accurate when the trip category is identified. It is again noted, however, that the daily trip generation has no bearing on the analysis performed and presented in the traffic study.

Please feel free to contact us if there are any questions regarding this information.

Sincerely,

[Redacted signature]

Cameron Nye, EIT
Associate Engineer

[Redacted signature]

Dalene J. Whitlock, PE, PTOE
Senior Principal



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