



December 23, 2020

Mr. Eric Yust  
StonyPoint Wellness, LLC  
P.O. Box 5349  
Santa Rosa, CA 95402

## Focused Traffic Study for the StonyPoint Wellness Project

Dear Mr. Yust;

As requested, W-Trans has prepped a focused transportation analysis for the proposed Stony Point Wellness dispensary to be located in the shopping center complex at 411 Stony Point Road in the City of Santa Rosa. The purpose of this letter is to present the project's trip generation as well as an analysis of the transportation-related issues required under the California Environmental Quality Act (CEQA).

### Project Description

As proposed, the dispensary would be located in a commercial suite of 2,270 square feet currently occupied by a video rental store. The proposed cannabis dispensary is estimated to employ ten to fifteen staff members and would operate between the hours of 9:00 a.m. and 9:00 p.m. as allowed by the City's cannabis ordinance. The project site plan is enclosed for reference.

### Trip Generation

The trip generation for the existing use of the space was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 10<sup>th</sup> Edition, 2017 for "Shopping Center" (LU #820). Although the Manual does not specify rates for a video rental store, the "Shopping Center" land use was determined to be the best category available as it reflects the general retail nature of the existing use as well as any other use that could replace it.

While the *Trip Generation Manual* also includes rates for "Marijuana Dispensary" (LU #882), these rates were collected at sites in Colorado during the early years of such sales being legal, so local data was relied upon to estimate the trip generation potential of the proposed project. Over the last two years, W-Trans has collected data at seven dispensaries in the North Bay Area, including four in the City of Santa Rosa. Our data collection effort has identified that local rates are consistent with those published by ITE for the p.m. peak hour but are substantially lower for the a.m. peak hour and over the course of an entire day. The difference in the a.m. peak hour is attributed to the fact that 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. The difference in daily rates is likely because the 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 rates reflect this elevated level of trip activity. As the industry has stabilized in the North Bay Area and more dispensaries have opened for business customers have more options so the trip generation of any single dispensary has decreased. A spreadsheet summarizing the local trip generation data and resulting rates is attached for reference.

### Consideration for Pass-by Trips

Given that the project is located within a shopping center complex accessed from Stony Point Road, a primary arterial in the City with an average daily traffic (ADT) volume of approximately 30,000, it is reasonable to assume that a portion of the project trips will be pass-by rather than primary. Pass-by trips are not considered new trips since they consist of drivers who are already driving on the adjacent street and choose to make an interim stop. In the case of the proposed project, many trips would be captured from traffic already traveling on Stony Point

Road. This is especially relevant as dispensaries have now been approved in different quadrants of the City so many customers no longer have to travel as far out of their way to reach a dispensary.

While the *Trip Generation Handbook*, 3<sup>rd</sup> Edition, 2017, does not include pass-by percentages for dispensaries, the *Handbook* does include pass-by rates for shopping centers, which reflects the retail nature of the project so was determined to be a good fit. Based on a review of pass-by entries for shopping centers adjacent to a roadway with an ADT similar to Stony Point Road, it is likely that the proposed project would experience a pass-by rate of 37 percent during the p.m. peak hour. This pass-by rate was also applied to the existing video store.

## Total Project Trip Generation

Based on the application of these rates and assumptions, the proposed project would be expected to generate an average of 121 trips per day at the project driveway, including four trips during the a.m. peak hour and 48 trips during the p.m. peak hour. After accounting for the trips associated with the existing video rental store that would cease with the project, the dispensary would be expected to result in 35 new daily trips on average with two new a.m. peak hour trips and 39 new p.m. peak hour trips. It is noted that if the potential for pass-by trips during the p.m. peak hour were taken into consideration, the project would result in 24 net new trips during this period. These results are summarized in Table 1.

**Table 1 – Trip Generation Summary**

| Land Use                        | Units     | Daily |       | AM Peak Hour |       |    |     | PM Peak Hour |       |     |     |
|---------------------------------|-----------|-------|-------|--------------|-------|----|-----|--------------|-------|-----|-----|
|                                 |           | Rate  | Trips | Rate         | Trips | In | Out | Rate         | Trips | In  | Out |
| Existing                        |           |       |       |              |       |    |     |              |       |     |     |
| Shopping Center                 | 2.270 ksf | 37.75 | 86    | 0.94         | 2     | 1  | 1   | 3.81         | 9     | 4   | 5   |
| Pass-by Potential               |           | -     | -     | -            | -     | -  | -   | -37%         | -3    | -1  | -2  |
| Total Existing with Pass-by     |           | -     | -     | -            | -     | -  | -   |              | 6     | 3   | 3   |
| Proposed                        |           |       |       |              |       |    |     |              |       |     |     |
| *Marijuana Dispensary           | 2.270 ksf | 53.09 | 121   | 1.59         | 4     | 3  | 1   | 21.27        | 48    | 26  | 22  |
| Pass-by Potential               |           | -     | -     | -            | -     | -  | -   | -37%         | -18   | -10 | -8  |
| Total Proposed with Pass-by     |           | -     | -     | -            | -     | -  | -   |              | 30    | 16  | 14  |
| Net New Trips (without Pass-by) |           |       | 35    |              | 2     | 2  | 0   |              | 39    | 22  | 17  |
| Net New Trips (with Pass-by)    |           |       | -     |              | -     | -  | -   |              | 24    | 13  | 11  |

Note: ksf = 1,000 square feet; \* = custom rates based on local data

Because the project would be expected to generate fewer than 50 new trips during either peak hour whether pass-by trips are taken into consideration or not, per the City's *Standard Guidance for the Preparation of Traffic Impact Analysis*, an operational analysis is not required so one was not prepared.

## Vehicle Miles Traveled

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 (LOS) analysis, the change in Vehicle Miles Traveled (VMT) as a result of a project will be the basis for determining California Environmental Quality Act (CEQA) impacts with respect to transportation and traffic.

Although not yet officially adopted, the City of Santa Rosa is in the process of preparing guidelines for VMT analysis, as outlined in *Vehicle Miles Traveled (VMT) Guidelines Final Draft*, dated June 5, 2020. This document

identifies several criteria that may be used to identify certain types of projects that are unlikely to have a significant VMT impact and can be “screened” from further analysis. One of these screening criteria pertains to local-serving retail, which the City defines as having up to 10,000 square feet of gross floor area. The theory behind this criteria is that while a larger retail project may generate interregional trips that increase a region’s total VMT, small retail establishments do not necessarily add new trips to a region, but change where existing customers shop within the region, and often shorten trip lengths. The proposed cannabis dispensary is a total of 2,270 square feet, which is well below the City’s local-serving retail threshold of 10,000 square feet; therefore, it is reasonable to conclude that the project would have a less-than-significant transportation impact on VMT.

**Finding** – Based on the screening criteria published by the City of Santa Rosa, the project is anticipated to result in a less-than-significant transportation impact on VMT.

## Alternative Modes

Given the proximity of residential neighborhoods within one-quarter mile surrounding the site, it is reasonable to assume that some project patrons and employees will want to walk, bicycle, and/or use transit to reach the project site.

## Pedestrian Facilities

Sidewalks exist along the project frontage on Stony Point Road and adjacent streets including West 3rd Street and Occidental Road, and provide adequate walking environments for pedestrians. Additionally, pedestrians can cross Stony Point Road at the signalized intersections with West 3<sup>rd</sup> Street and Occidental Road.

## Bicycle Facilities

Class II bicycle lanes exist on Stony Point Road and Occidental Road in the project vicinity. In addition, the City of Santa Rosa’s *Bicycle & Pedestrian Master Plan*, 2018, includes plans for buffered bicycle lanes on West 3<sup>rd</sup> Street from Brittain Lane to Stony Point Road and Class II bicycle lanes from Stony Point to Rusch Lane. The City is in the process of conducting a multimodal corridor study for the section of Stony Point Road between West 3<sup>rd</sup> Street and Sebastopol Road which includes preliminary plans to provide buffered bike lanes and enhanced bicycle crossing measures. As a result, access for bicyclists is currently adequate and would be further improved upon completion of planned bicycle projects.

## Transit

The nearest transit stop is on northbound Stony Point Road across from the project site. This stop is served by Santa Rosa CityBus Route 15, which provides service to and from the North Santa Rosa Train Station. There are also two transit stops on West 3<sup>rd</sup> Street near the intersection with Stony Point Road, which are served by Route 6. The buses for this route run between the Downtown Train Station and the North Santa Rosa Train Station. All three transit stops are located within one-quarter of a mile of the project site and therefore provide convenient access for project patrons and employees.

**Finding** – Existing pedestrian and transit facilities provide adequate access to and from the project site. Existing bicycle facilities are also considered adequate and are anticipated to improve further upon completion of the bicycle projects planned for the surrounding vicinity.

## Conclusions

- The proposed dispensary would be expected to generate 35 more daily trips on average than the existing video rental store, including two more trips during the a.m. peak hour and 39 more trips during the p.m. peak hour. When pass-by deductions are taken into consideration, the dispensary would be expected to result in 24 new trips during the p.m. peak hour compared to the previous use.

- The proposed project is classified as local-serving retail under the City's VMT screening criteria and can therefore be presumed to have a less-than-significant impact on VMT.
- The existing sidewalks along the project's frontages and adjacent streets provide adequate access to the site and nearby transit facilities. Existing and planned bicycle facilities provide adequate access that will be enhanced with implementation of planned future improvements.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,

Jade Kim  
Assistant Engineer

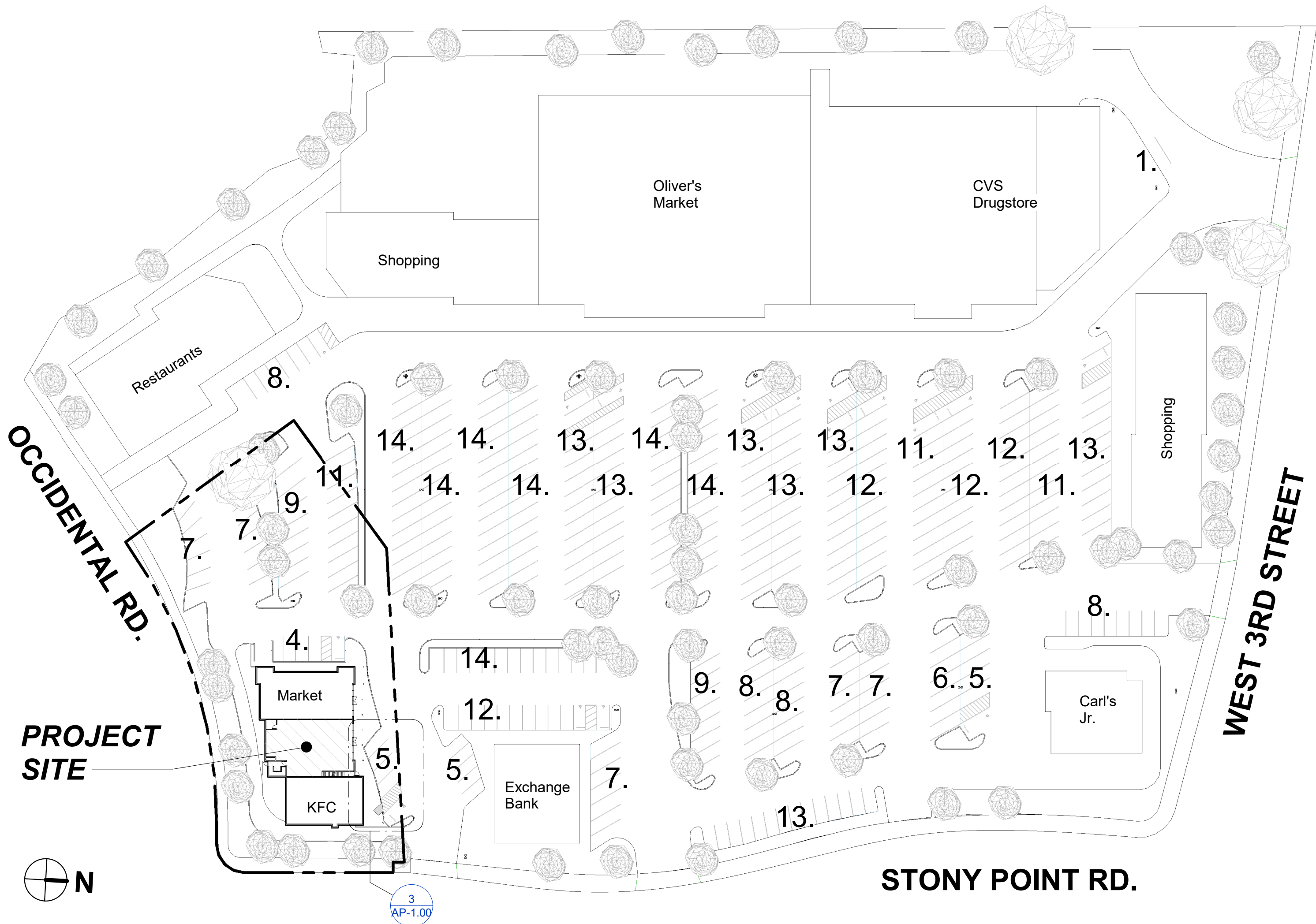
Cameron Nye, EIT  
Associate Engineer

Dalene J. Whitlock, PE, PTOE  
Senior Principal

DJW/cn-jk/SRO569.L1

Enclosures: Site Plan  
North Bay Dispensary Trip Generation Rates





1 Site - Existing  
1" = 60'-0"

### Parking Analysis:

**Santa Rosa city code:**  
**20-36.040** Number of parking spaces required...  
E. Multi-use sites. A site with multiple uses shall provide the aggregate number of parking spaces required for each separate use, except where:  
1. The site was developed comprehensively as a shopping center, the parking ratio shall be that required for the shopping center as a whole regardless of individual uses listed in Table 3-4...

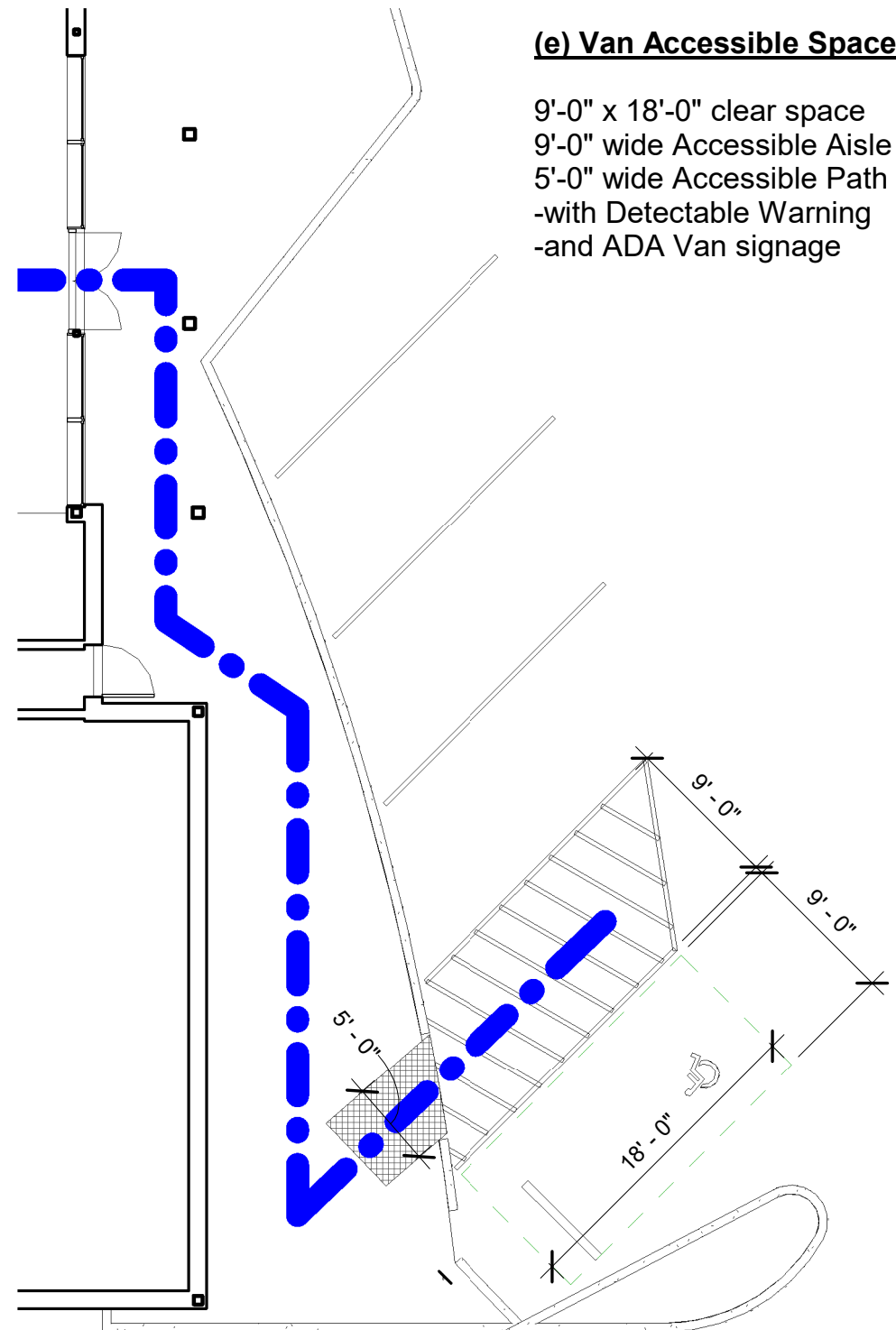
**Per Table 3-4:**  
Shopping Centers require 1 space for each 250 sf. of gross leasable area.

**Shopping Center Required Parking Space calculations:**  
Stony Point Rd. Shopping Center total leasable area = 94,819 sqft.  
@ 1 parking space :250 sqft = (379) parking spaces required.

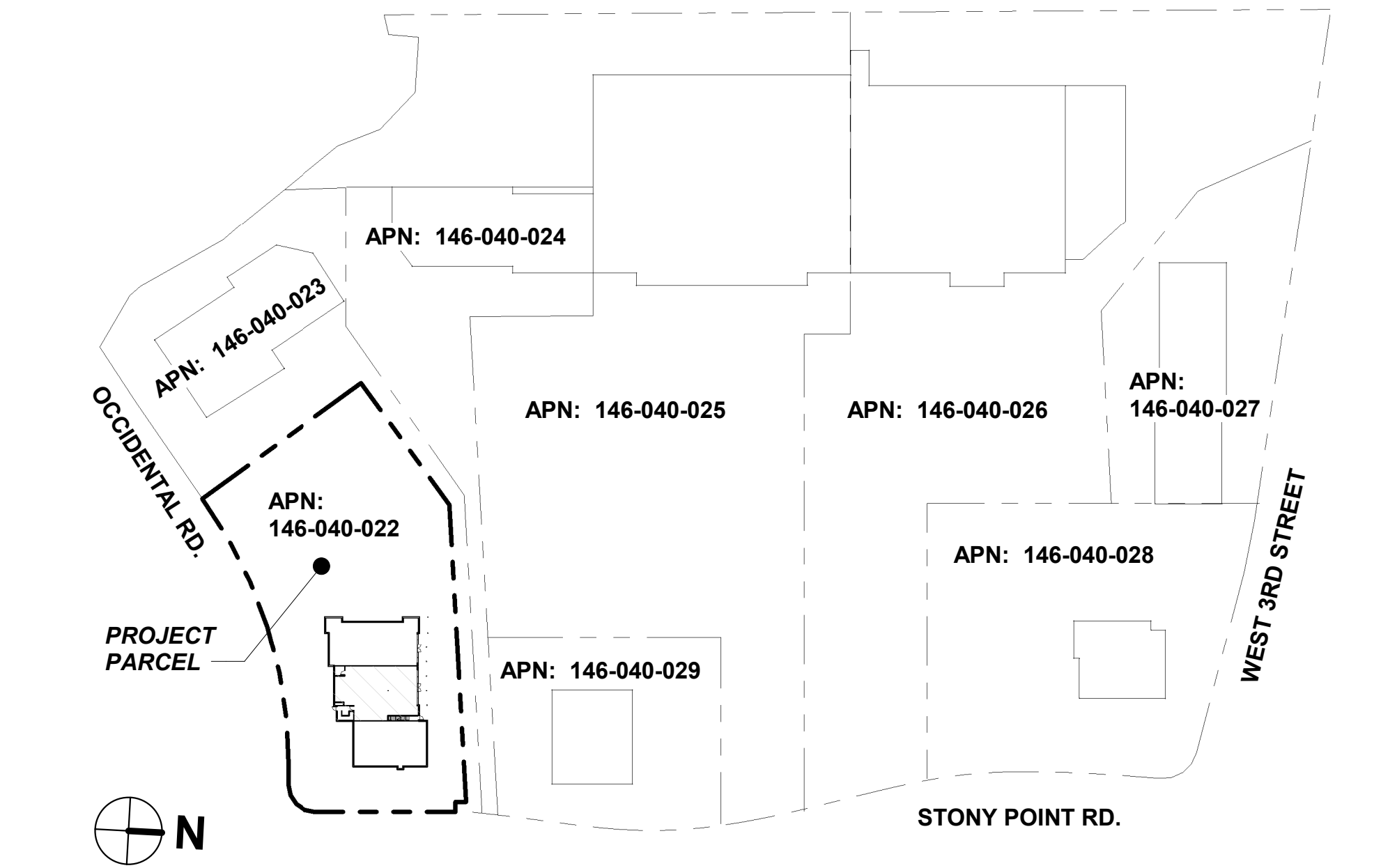
**Shopping Center Existing Parking Spaces provided:**  
(381) total Parking spaces provided, including,  
(6) ADA Standard Accessible parking spaces, and  
(12) ADA Van Accessible parking spaces

**PROPOSED DISPENSARY parking spaces required:**  
2,260 sqft / 1:250sqft = 9.04, and (9) spaces required

**PROPOSED DIPENSARY parking spaces provided:**  
(10) parking spaces provided, including,  
(1) ADA Van Accessible parking space



3 Site - Existing ADA Van Parking  
1" = 10'-0"



2 Site - (e) Parcel Plan  
1" = 100'-0"

#### Stony Pt. Rd. Shopping Center Existing Parking Spaces:

381 parking spaces provided

Stony Pt. Rd. Shopping Center Total Building Area: 94,819 sf 379 parking req. 1: 250

|                   |                        |          |                  |        |
|-------------------|------------------------|----------|------------------|--------|
| APN 145-040-022:  | total building area    | 7,866    |                  |        |
| 401 Stony Pt. Rd. | Kentucky Fried Chicken | 2,247 sf | 9 parking stalls | 1: 250 |
| 407 Stony Pt. Rd. | Offices                | 1,025 sf | 4 parking stalls | 1: 250 |
| 411 Stony Pt. Rd. | DISPENSARY             | 2,260 sf | 9 parking stalls | 1: 250 |
| 419 Stony Pt. Rd. | C S Liquor Mart        | 2,334 sf | 9 parking stalls | 1: 250 |

|                   |                           |          |                   |        |
|-------------------|---------------------------|----------|-------------------|--------|
| APN 146-040-023:  | total building area:      | 8,930    |                   |        |
| 421 Stony Pt. Rd. | El Molino Tortilla        | 2,800 sf | 11 parking stalls | 1: 250 |
| 425 Stony Pt. Rd. | El Patio Mexican take out | 2,800 sf | 11 parking stalls | 1: 250 |
| 429 Stony Pt. Rd. | China Garden              | 1,665 sf | 7 parking stalls  | 1: 250 |
| 437 Stony Pt. Rd. | Amigo Laundry             | 1,665 sf | 7 parking stalls  | 1: 250 |

|                   |                              |          |                  |        |
|-------------------|------------------------------|----------|------------------|--------|
| APN 146-040-024   | total building area:         | 8,000 sf |                  |        |
| 441 Stony Pt. Rd. | People Ready office staffing | 1,200 sf | 5 parking stalls | 1: 250 |
| 443 Stony Pt. Rd. | Subway                       | 1,100 sf | 4 parking stalls | 1: 250 |
| 445 Stony Pt. Rd. | Diva Nails                   | 1,100 sf | 4 parking stalls | 1: 250 |
| 447 Stony Pt. Rd. | Ocean Spa                    | 1,100 sf | 4 parking stalls | 1: 250 |
| 449 Stony Pt. Rd. | Dominos                      | 1,300 sf | 5 parking stalls | 1: 250 |
| 451 Stony Pt. Rd. | Cigarettes R Cheaper         | 1,100 sf | 4 parking stalls | 1: 250 |
| 453 Stony Pt. Rd. | Ocean Day Spa                | 1,100 sf | 4 parking stalls | 1: 250 |

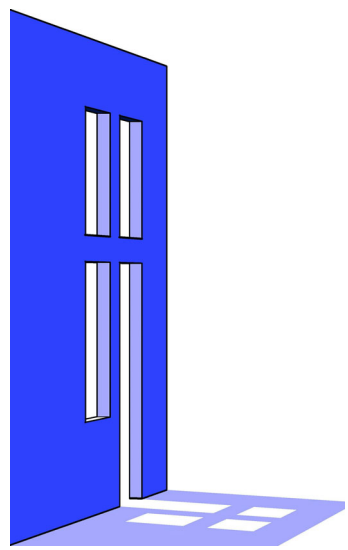
|                   |                      |           |                    |        |
|-------------------|----------------------|-----------|--------------------|--------|
| APN: 156-040-025  | total building area: | 29,934 sf |                    |        |
| 461 Stony Pt. Rd. | Oliver's Market      | 29,934 sf | 120 parking stalls | 1: 250 |

|                    |                      |           |                   |        |
|--------------------|----------------------|-----------|-------------------|--------|
| APN: 146-040-026   | total building area: | 23,164 sf |                   |        |
| 4 63 Stony Pt. Rd. | CVS drugstore        | 23,164 sf | 93 parking stalls | 1: 250 |

|                   |                       |          |                  |        |
|-------------------|-----------------------|----------|------------------|--------|
| APN: 146-040-027  | total building area:  | 9,000 sf |                  |        |
| 465 Stony Pt. Rd. | AIM Mail Center       | 1,200 sf | 5 parking stalls | 1: 250 |
| 467 Stony Pt. Rd. | Nails 4 U             | 1,200 sf | 5 parking stalls | 1: 250 |
| 469 Stony Pt. Rd. | AT&T                  | 1,600 sf | 6 parking stalls | 1: 250 |
| 471 Stony Pt. Rd. | Beauty Supply         | 1,200 sf | 5 parking stalls | 1: 250 |
| 473 Stony Pt. Rd. | Ieriyaki Chicken Bowl | 1,200 sf | 5 parking stalls | 1: 250 |
| 475 Stony Pt. Rd. | State Farm            | 1,200 sf | 5 parking stalls | 1: 250 |
| 479 Stony Pt. Rd. | Stony Plaza Dental    | 1,400 sf | 6 parking stalls | 1: 250 |

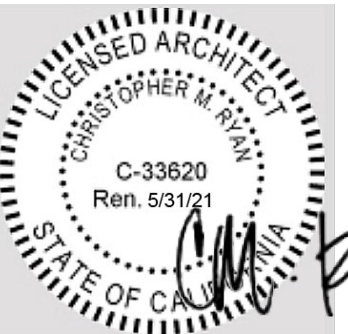
|                   |                       |          |                   |        |
|-------------------|-----------------------|----------|-------------------|--------|
| APN: 146-040-028  | total building area:  | 3,996 sf |                   |        |
| 495 Stony Pt. Rd. | Carl's Jr. restaurant | 3,996 sf | 16 parking stalls | 1: 250 |

|                   |                      |          |                   |        |
|-------------------|----------------------|----------|-------------------|--------|
| APN: 146-040-029  | total building area: | 3,929 sf |                   |        |
| 499 Stony Pt. Rd. | Exchange Bank        | 3,929 sf | 16 parking stalls | 1: 250 |



4dPerspective

Christopher M. Ryan, NCARB  
PH: (415) 531-0404



## Proposed Dispensary 411 Stony Pt. Rd.

| No. | Description | Date |
|-----|-------------|------|
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |
|     |             |      |

### Yust Proposed Dispensary

#### Existing & New Site Plan

|                |         |
|----------------|---------|
| Project number | 2007    |
| Date           | 11/7/20 |
| Drawn by       | 4dP     |
| Checked by     | EY      |

AP-1.00

Scale As indicated

# NORTH BAY DISPENSARY RATES

| NORTH BAY DISPENSARY RATES |              |       |            |                        | DAILY              |             | AM PEAK HOUR (7-9) |                 |        |           |            |         |            |             | PM PEAK HOUR (4-6) |                 |        |           |            |         |            |             |       |
|----------------------------|--------------|-------|------------|------------------------|--------------------|-------------|--------------------|-----------------|--------|-----------|------------|---------|------------|-------------|--------------------|-----------------|--------|-----------|------------|---------|------------|-------------|-------|
| LOCATION                   | No. of Units | Units | DATE       | Setting/Location       | Trip Rate per Unit | Total Trips | Trip Rate per Unit | Number of Trips | In (%) | In (Rate) | In (Trips) | Out (%) | Out (Rate) | Out (Trips) | Trip Rate per Unit | Number of Trips | In (%) | In (Rate) | In (Trips) | Out (%) | Out (Rate) | Out (Trips) |       |
| Dispensary 1               | 3.8          | ksf   | 12/18/2018 | General Urban/Suburban |                    |             | 4.47               | 17              | 88%    | 3.95      | 15         | 12%     | 0.53       | 2           | 20.00              | 76              | 42%    | 8.42      | 32         | 58%     | 11.58      | 44          |       |
| Santa Rosa                 | 3.8          | ksf   | 12/19/2018 | General Urban/Suburban |                    |             | 4.21               | 16              | 94%    | 3.95      | 15         | 6%      | 0.26       | 1           | 23.68              | 90              | 44%    | 10.53     | 40         | 56%     | 13.16      | 50          |       |
| AVERAGE                    |              |       |            |                        |                    |             | 4.34               |                 | 91%    | 3.95      |            | 9%      | 0.39       |             | 21.84              |                 | 43%    | 9.47      |            | 57%     | 12.37      |             |       |
| Dispensary 2               | 1.17         | ksf   | 12/12/2018 | General Urban/Suburban |                    |             | 1.71               | 2               | 100%   | 1.71      | 2          | 0%      | 0.00       | 0           | 48.72              | 57              | 53%    | 25.64     | 30         | 47%     | 23.08      | 27          |       |
| Santa Rosa                 | 1.17         | ksf   | 12/17/2018 | General Urban/Suburban |                    |             | 1.71               | 2               | 100%   | 1.71      | 2          | 0%      | 0.00       | 0           | 53.85              | 63              | 54%    | 29.06     | 34         | 46%     | 24.79      | 29          |       |
| AVERAGE                    |              |       |            |                        |                    |             | 1.71               |                 | 100%   | 1.71      |            | 0%      | 0.00       |             | 51.28              |                 | 53%    | 27.35     |            | 47%     | 23.93      |             |       |
| Dispensary 3               | 4.8          | ksf   | 12/18/2018 | General Urban/Suburban |                    |             | 1.46               | 7               | 86%    | 1.25      | 6          | 14%     | 0.21       | 1           | 14.58              | 70              | 54%    | 7.92      | 38         | 46%     | 6.67       | 32          |       |
| Santa Rosa                 | 4.8          | ksf   | 12/19/2018 | General Urban/Suburban |                    |             | 0.83               | 4               | 100%   | 0.83      | 4          | 0%      | 0.00       | 0           | 15.00              | 72              | 56%    | 8.33      | 40         | 44%     | 6.67       | 32          |       |
| AVERAGE                    |              |       |            |                        |                    |             | 1.15               |                 | 93%    | 1.04      |            | 7%      | 0.10       |             | 14.79              |                 | 55%    | 8.13      |            | 45%     | 6.67       |             |       |
| Dispensary 4               | 1.508        | ksf   | 8/6/2019   | General Urban/Suburban |                    |             |                    |                 |        |           |            |         |            |             | 43.10              | 65              | 51%    | 21.88     | 33         | 49%     | 21.22      | 32          |       |
| Sebastopol                 | 1.508        | ksf   | 8/15/2019  | General Urban/Suburban |                    |             |                    |                 |        |           |            |         |            |             | 39.12              | 59              | 49%    | 19.23     | 29         | 51%     | 19.89      | 30          |       |
| AVERAGE                    |              |       |            |                        |                    |             |                    |                 |        |           |            |         |            |             | 41.11              |                 | 50%    | 20.56     |            | 50%     | 20.56      |             |       |
| Dispensary 5               | 5.79         | ksf   | 8/7/2019   | General Urban/Suburban |                    |             |                    |                 |        |           |            |         |            |             | 24.18              | 140             | 51%    | 12.44     | 72         | 49%     | 11.74      | 68          |       |
| Cotati                     | 5.79         | ksf   | 8/12/2019  | General Urban/Suburban |                    |             |                    |                 |        |           |            |         |            |             | 26.94              | 156             | 49%    | 13.13     | 76         | 51%     | 13.82      | 80          |       |
| AVERAGE                    |              |       |            |                        |                    |             |                    |                 |        |           |            |         |            |             | 25.56              |                 | 50%    | 12.78     |            | 50%     | 12.78      |             |       |
| Dispensary 6               | 3.454        | ksf   | 9/30/2020  | General Urban/Suburban | 75.85              | 262         | 0.87               | 3               | 67%    | 0.58      | 2          | 33%     | 0.29       | 1           | 6.95               | 24              | 58%    | 4.05      | 14         | 42%     | 2.90       | 10          |       |
| Santa Rosa                 | 3.454        | ksf   | 10/1/2020  | General Urban/Suburban | 87.43              | 302         | 0.58               | 2               | 50%    | 0.29      | 1          | 50%     | 0.29       | 1           | 7.53               | 26              | 54%    | 4.05      | 14         | 46%     | 3.47       | 12          |       |
|                            | 3.454        | ksf   | 10/2/2020  | General Urban/Suburban | 92.07              | 318         | 3.18               | 11              | 55%    | 1.74      | 6          | 45%     | 1.45       | 5           | 6.66               | 23              | 48%    | 3.18      | 11         | 52%     | 3.47       | 12          |       |
| AVERAGE                    |              |       |            |                        | 85.12              |             | 1.54               |                 | 57%    | 0.87      |            | 43%     | 0.68       |             | 7.04               |                 | 53%    | 3.76      |            | 47%     | 3.28       |             |       |
| Dispensary 7               | 2.5          | ksf   | 9/30/2020  | General Urban/Suburban | 21.60              | 54          | 0.00               | 0               | 0%     | 0.00      | 0          | 0%      | 0.00       | 0           | 2.80               | 7               | 71%    | 2.00      | 5          | 29%     | 0.80       | 2           |       |
| Napa                       | 2.5          | ksf   | 10/1/2020  | General Urban/Suburban | 22.40              | 56          | 0.00               | 0               | 0%     | 0.00      | 0          | 0%      | 0.00       | 0           | 2.00               | 5               | 60%    | 1.20      | 3          | 40%     | 0.80       | 2           |       |
|                            | 2.5          | ksf   | 10/2/2020  | General Urban/Suburban | 19.20              | 48          | 0.00               | 0               | 0%     | 0.00      | 0          | 0%      | 0.00       | 0           | 5.20               | 13              | 46%    | 2.40      | 6          | 54%     | 2.80       | 7           |       |
| AVERAGE                    |              |       |            |                        | 21.07              |             | 0.00               |                 | 0.00   | 0.00      |            | 0.00    | 0.00       |             | 3.33               |                 | 59%    | 1.87      |            | 41%     | 1.47       |             |       |
| ITE RATES (LU#882) -       |              |       |            |                        |                    |             | 252.70             |                 | 10.44  |           | 56%        | 5.85    |            | 44%         | 4.59               |                 | 21.83  |           | 50%        | 10.92   |            | 50%         | 10.92 |
| AVERAGE LOCAL RATES -      |              |       |            |                        |                    |             | 53.09              |                 | 1.59   |           | 82%        | 1.33    |            | 18%         | 0.25               |                 | 21.27  |           | 53%        | 10.84   |            | 47%         | 10.43 |