



Memorandum

Date: August 24, 2021

To: Kirk Lok, Lok GuerneWood Park Development Company, LLC

From: Jason M. Brandman, FirstCarbon Solutions and Colin Burgett, GHD

Subject: Vehicle Miles Traveled (VMT) Impact Assessment for the GuerneWood Park Resort Project

In accordance with our scope of work, FCS, in conjunction with TJKM, our traffic partner, has prepared a Vehicle Miles Traveled Assessment for the GuerneWood Park Resort Project in Sonoma County, CA. The findings of that assessment are provided below.

VEHICLE MILES TRAVELED (VMT) IMPACT ASSESSMENT FOR THE GUERNEVILLE RESORT PROJECT

This section provides an analysis of potential impacts due to vehicle miles travelled (VMT) attributable to the project. Sonoma County has not yet adopted criteria and impact thresholds for evaluating VMT impacts. The analysis of VMT impacts described below meets the requirements stipulated by recent changes to statewide CEQA guidelines, and incorporate relevant advice contained in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* published by the Governor's Office of Planning & Research (OPR) in December 2018.

Office of Planning and Research (OPR) Technical Advisory for Evaluating VMT

SB 743, which was signed into law by Governor Brown in 2013 and codified in Public Resources Code 21099, tasked OPR with establishing new criteria for determining the significance of transportation impacts under CEQA. SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." SB 743 changes the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, § 21099, subd. (b)(2)). In December 2018, OPR circulated its most recent *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR) that provides recommendations and describes various options for assessing VMT for transportation analysis purposes. The VMT analysis options described by OPR are primarily tailored towards single-use development residential, office or office projects, not mixed-use projects and not hotel projects. OPR recommends the following methodology and criteria for specific land uses:

- For residential projects, OPR recommends that VMT impacts be considered potentially significant if a residential project is expected to generate VMT per Capita (i.e., VMT per resident) at a rate that exceeds 85 percent of a regional average. For office projects, OPR recommends that VMT impacts be considered potentially significant if an office project is expected to generate VMT per Employee at a rate that exceeds 85 percent of a regional average.
- For retail projects, OPR recommends that VMT impacts be considered potentially significant if a project results in a net increase in total VMT. This approach takes into account the likelihood that retail developments may lead to increases or decreases in VMT, depending on previously existing retail travel patterns. This approach may also be used for other types of projects with customer components.
- OPR does not provide specific guidance on evaluating other land use types, such as hotels, except to say that other land uses could choose to use the method applicable to the land use with the most similarity to the proposed project.

OPR also recommends exempting some project types from VMT analysis based on the likelihood that such projects will generate low rates of VMT. OPR recommends that projects generating less than 110 trips per day generally may be assumed to cause a less than significant transportation impact.

Potentially relevant to the analysis of VMT attributable to employee VMT: OPR's Technical Advisory also notes that "low wage workers in particular would be more likely to choose a residential location close to their workplace if one is available."

California Environmental Quality Act (CEQA) Requirements for VMT Evaluations

Section 15064.3 of the State CEQA Guidelines describes the requirements for assessing transportation impacts based on vehicle miles traveled (VMT) that apply statewide beginning on July 1, 2020. As described in Section 15064.3:

- "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 or non-motorized travel. As described separately in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR, December 2018), VMT re-routed from other origins or destinations as the result of a project would not be attributable to a project except to the extent that the re-routing results in a net increase in VMT. For example, OPR guidelines note that retail projects typically re-route travel from other retail destinations, and therefore a retail project may lead to increases or decreases in VMT, depending on previously existing travel patterns. Similarly, a large share of retail trips are "pass-by trips" that would not be considered attributable to a retail project.

- Lead agencies have discretion to choose the most appropriate methodology to evaluate a project’s vehicles miles traveled, including whether to express the change in absolute terms, per capita, per household or any other measure.
- If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered: a lead agency may evaluate the project’s vehicle miles travelled qualitatively.
- A lead agency may use models to estimate a project’s vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence.

VMT Impact Criteria for Proposed Project

Based on the OPR recommendations and confirmation with Sonoma County staff, VMT impacts attributable to the proposal hotel may be considered potentially significant if:

- Home-based work VMT per Employee exceeds 85 percent of the average rate for Sonoma County; or
- VMT attributable to hotel guests results in a net increase in total VMT. The analysis of net VMT takes into account that hotels attract guests already visiting Sonoma County that would otherwise stay at another hotel, as well as “day trippers” already visiting the area that would otherwise not stay in the area overnight.

An existing public access easement across a portion of the project site provides access from Highway 116 to the Russian River. This easement will be relocated and upgraded on site to include a new five-foot wide pathway. In addition, 25 parking spaces will be provided for public use to access the trail from sunrise to sunset. The proposed enhancements to public access are anticipated to serve existing visitors to the area and are not anticipated to add significant new trips to the area or a net increase in total VMT.

Table 1 shows the countywide rate of home-based work VMT per Employee attributable to employment locations in Sonoma County. As shown, the average rate of VMT per Employee is 22.8 miles (round-trip). Therefore, the impact threshold applicable to hotel employees for this analysis is 19.4 miles (round-trip) for home-based VMT per Employee.

Table 1: Sonoma County–VMT per Employee

	Model Baseline Conditions
Employment (number of jobs in Sonoma County)	216,458
Home-based Work VMT (daily round-trip miles, home to work)	4,930,925 miles (round-trip)
VMT per Employee (Countywide average)	22.8 miles (round-trip)
Impact Threshold (85% of Countywide average)	19.4 miles (round-trip)
Source: Sonoma County Travel Model Baseline (Year 2015)	

VMT Impact Findings: Hotel Employees

The proposed Guerneville Park Resort Project (the project) consists of a 120-room resort hotel with up to 37 employees to be constructed on an existing vacant lot bordering State Route 116 (SR 116) across from Guerneville Lane. Bus service in the area is provided by Sonoma County Transit (SCT) with existing bus stops near the intersection of SR 116 and Old Monte Rio Road, near the northwest corner of the site. Route 20 provides daily service between Monte Rio and downtown Santa Rosa, operating on hourly to bi-hourly headways on weekdays, with roughly three-hour headways on weekends. Route 20X provides one morning and one evening express trip between Occidental and Santa Rosa via Guerneville. Route 28 provides service in the Guerneville, Occidental and Monte Rio areas with two morning and three afternoon buses that operate on weekdays.

Table 2 shows the forecasted net change in daily home-based work VMT to jobs in the project area,¹ resulting from the proposed hotel, based on the Sonoma County Travel Demand Model estimates for baseline conditions (year 2015) with and without the hotel. The model predicts a net increase of 894 round-trip daily home-based work miles generated by 120 daily trips (60 inbound and 60 outbound) attributable to the hotel employees. Based on 60 employees as presumed by the model forecast: this forecasted net increase in employment VMT would thus equate to 14.9 miles per employee (round-trip) based on the model, thus below the impact threshold of 19.4 miles per employee (round-trip). **Based on the model forecast: VMT impacts attributable to hotel employees are less than significant.**

Table 2: VMT per Employee

	Model Baseline Conditions	Model Baseline plus Hotel Conditions	Hotel Employee VMT
Home-based Work VMT (round-trip) ²	5,836	6,730	+894
Number of Employees (Proposed Hotel)			60³
VMT per Employee (Proposed Hotel)			14.9 miles (round-trip)
Source: Sonoma County Travel Model Baseline (Year 2015)			

VMT Impact Findings: Hotel Guests

VMT attributable to hotel guests would be considered significant if it resulted in a net increase in total countywide VMT, consistent with the recommended method of evaluating VMT for customer-serving retail uses.

The proposed hotel would serve to provide regionally desirable lodging in order to accommodate tourists that visit locations in the Russian River area. The analysis of net VMT takes into account that hotels attract guests already visiting Sonoma County that would otherwise stay at another hotel, vacation rental, or Air B&B in the County, as well as “day trippers” already visiting the area that would otherwise not stay in the area overnight. Over 70 percent of visitors to Sonoma County are “day

¹ The project area is a transportation analysis zone (TAZ) as defined by the Sonoma County Travel Demand Model that includes the project site, referred to as TAZ 63.

² Based on the model forecast of home-based work trips to employment sites within the transportation analysis zone (TAZ) that includes the project site, defined as TAZ 63 within the Sonoma County Travel Demand Model.

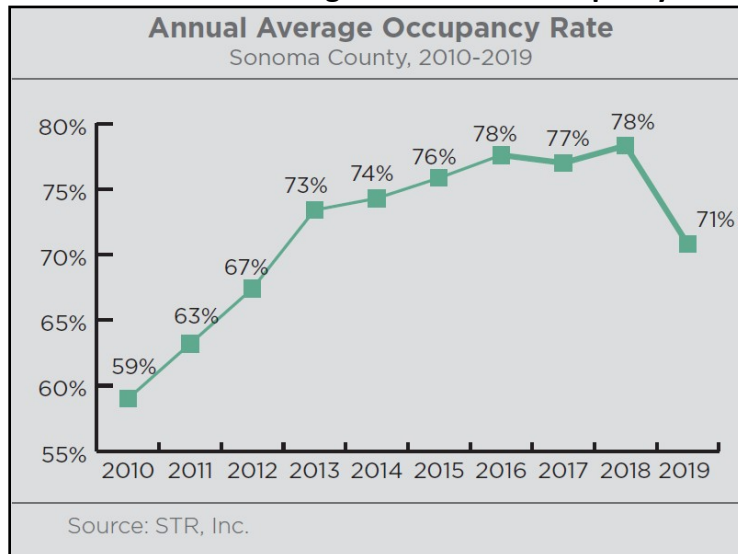
³ The model forecast presumes 120 home-based work trips to/from the hotel (60 inbound and 60 outbound); thus, the model forecast presumes a total of 60 employees.

trippers”. Day-trippers are potentially more likely to travel on Sonoma County roads during peak hours especially in the summer months, while hotel guests tend to arrive and depart outside of peak traffic hours. San Francisco Bay Area residents are frequent day-trippers, while overnight guests staying at hotels or other accommodations located in other cities in the region such as Healdsburg, Windsor, Petaluma, Santa Rosa, and Napa currently travel on area roads, including Highway 116.

Sonoma County had a total supply of over 6,100 hotel rooms in 2015¹, which increased to over 6,300 rooms by 2018, despite a loss of approximately 400 hotel rooms that were lost to fires in 2017. In addition, other lodging options within the County include more than 750 Airbnb rentals, and an estimated 3,700 campground and recreational vehicle spaces.

As shown on Table 3, the number of hotel guests in Sonoma County increases or decreases each year, independently of the number of hotel rooms. The 2020 Sonoma County Annual Tourism Report noted that the annual average hotel room occupancy rate over a 10-year period showed steady increase of occupancy from 59 percent occupancy in 2010, to 78 percent occupancy in 2018. Low occupancy rates from 2010-12 reflected the lingering effects of the 2007-09 worldwide recession. The high occupancy rate in 2018 occurred during a time when a large share of hotel guests were local residents that had been displaced from their homes due to fires, as well as first responders and construction workers². In 2019, the occupancy rate decreased to 71 percent. With the pandemic limiting worldwide travel beginning in early 2020, the subsequent years should show a decrease for 2020-21, but most likely trend back to the average of about 72 percent by 2022. Based on these trends: the proposed hotel is unlikely to result in an increase in the number of visitors to Sonoma County, and therefore VMT attributable to hotel guests is unlikely to result in a net increase in total countywide VMT. Therefore: **VMT impacts generated by hotel guests are anticipated to be less than significant.**

Table 3: Annual Average Hotel Room Occupancy Rate



¹ HVS, *In Focus: Sonoma County California Hotel Market*, July 2015.

² Sonoma County Economic Development Board, *Sonoma County Annual Tourism Report*, 2019