



June 11, 2020

Ms. Susie Murray  
Project Planner  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404

## Responses to Comments on the In-N-Out Burger Project

Dear Ms. Murray;

The comment letter from the California Department of Transportation, District 4, dated January 23, 2019, regarding the draft *Traffic Impact Study for the Yolanda Mixed-Use Project* dated November 8, 2018, was addressed through edits to the text of the report prior to its finalization and the comment letter and a letter responding to the comments was provided in Appendix A of the final *Traffic Impact Study for the Yolanda Mixed-Use Project*, February 7, 2019. The project as evaluated included a residential component which has subsequently been approved and the In-N-Out Burger, which is the subject of this additional information.

Since the report was finalized there have been changes in terms of the application of the Vehicle Miles Travelled (VMT) metric to development projects. The following additional information is provided relative to the "Vehicle Trip Reduction" comment, which is paraphrased below.

*Vehicle Trip Reduction – Given the intensification of use and the opportunity to reduce VMT, we encourage the City to establish the Transportation Demand Management (TDM) elements described below to promote smart mobility and reduce regional VMT and traffic impacts to the STN (followed by a list of potential measures).*

Senate Bill (SB) 743 established a change in the metric to be applied to determining traffic impacts associated with development projects. Rather than the delay-based criteria associated with a Level of Service 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.

A retail project resulting in an increase to the region's total VMT may reflect a significant impact. Research has shown that local-serving commercial uses, typically those under 50,000 square feet in size, and infill retail developments tend to *shift* where vehicle trips occur rather than generate wholly new trips (and corresponding vehicle miles traveled). This premise is supported by the California Office of Planning and Research (OPR) in its publication *Technical Advisory on Evaluation Transportation Impacts in CEQA*, December 2018. Because the proposed project is less than 50,000 square feet and would be expected to shift *where* people purchase food rather than increase the amount of food being sold in the North Bay, it is reasonable to presume that total regional VMT would not increase as a result of the project. The presence of other In-N-Out locations in the county, including northern Santa Rosa to the north and Rohnert Park to the south, also supports the conclusion that the project would indeed function as local-serving retail with most customers likely traveling from nearby areas of Santa Rosa, with little potential to draw longer trips from the wider region.

OPR guidance for commercial uses and the SCTA model use a metric of VMT per capita for employees. A project exceeding a level of 15 percent below the existing regional VMT per capita may indicate a significant transportation impact. OPR encourages the use of screening maps to establish geographic areas that achieve the 15 percent below regional average thresholds, allowing jurisdictions to "screen" projects in those areas from quantitative VMT analysis since impacts can be presumed to be less than significant. SCTA prepared a draft screening map that shows the project site to be within a screened area. It is therefore reasonable to conclude that

the project would have a less-than-significant VMT impact associated with employee travel. A copy of the VMT screening map is enclosed.

Given that the project is expected to have less-than-significant impact on VMT, no TDM plan or mitigation measures are required for the project. Although there are several TDM strategies listed in the Caltrans letter dated January 23, 2019, no such TDM strategies would be required for the project.

Please let us know if there are any questions regarding this information.

Sincerely,

  
Andre Huff  
Assistant Planner III

  
Dalene J. Whitlock, PE, PTOE  
Senior Principal

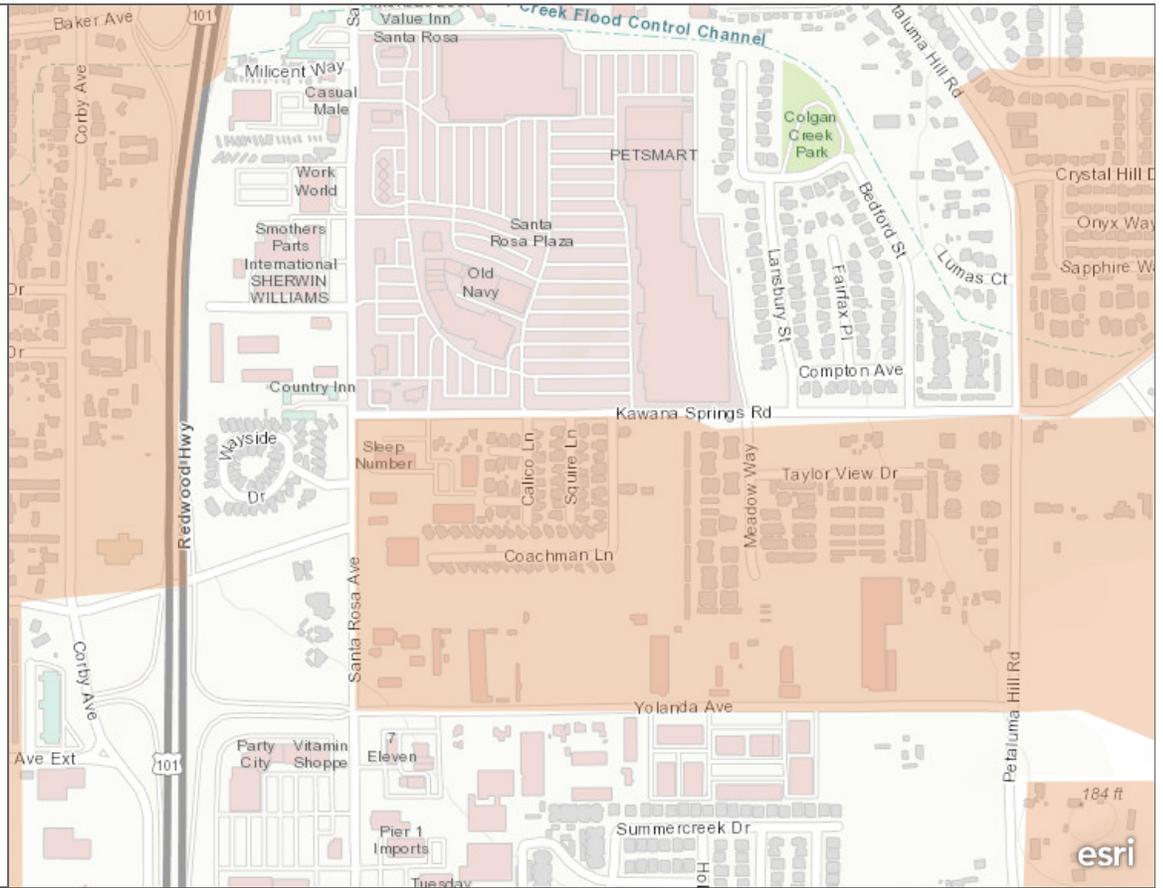


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Enclosure: SCTA Employment VMT Screening Map

# SCTM 2015 DRAFT VMT Estimates

Employment VMT  
Prescreened - Work  
VMT/Employee 15%  
below CW Avg.



600ft

Sonoma County, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, Intermap, USGS, METI/NASA, EPA, USDA