

Attachment F

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Keith Higgins

Traffic Engineer

March 22, 2023

Patrick Whisler
47 Highway 1
Carmel, CA 92923

Re: 47 Highway One Short Term Rental Trip Generation Estimate Compared with Residential and Visitor Accommodation Land Use Alternatives, Monterey County, California

Dear Patrick,

Per your request, this is a trip generation estimate and Vehicle Miles Traveled (VMT) evaluation for the 47 Highway One Short Term Rental Project (Project), located on the west side of Highway 1 immediately north of Monastery Beach in Monterey County, California. The Project is proposed to include three (3) rental units, which have a minimum stay of 4 nights and are also used as longer-term rentals.

As mandated by California Senate Bill SB 743, effective July 1, 2020, vehicle-miles-travelled (VMT) replaced level of service in the evaluation of environmental impacts under CEQA. Although a draft policy has been developed, Monterey County has not adopted a formal VMT policy which would include the methodology for performing this analysis. However, Monterey County's draft VMT policy and evaluation methodology are consistent with the "Technical Advisory on Evaluating Transportation Impacts in CEQA," State of California Governor's Office of Planning and Research, December 2018 (OPR Guidelines), which provides implementation guidance for SB 743 for evaluating development proposals. The study scope of work includes an estimate of Project trip generation and its implications on traffic impacts and Vehicle Miles Traveled (VMT) per the draft Monterey County VMT Policy.

1. **Project Trip Generation** - Project trip generation is estimated based on trip generation rates in the "Trip Generation Manual," Institute of Transportation Engineers, 11th Edition, September 2021 (ITE Trip Manual). The ITE Trip Manual is the standard source of trip generation data used throughout the traffic engineering and transportation planning industry. No ITE Trip Manual land use category corresponds exactly with the Project description, which includes a mix of short term and longer-term rental usage. The land use categories with descriptions that are closest to the Project in the ITE Manual include Single Family Residential (ITE Land Use Code 210), Single-Family Attached Housing (ITE Land Use Category 215), Multi-Family Housing (Low-Rise) (ITE Land Use Code 220), Recreational Home (ITE Land Use Code 260), and Timeshare (ITE Land Use Code 265). Estimates of Project trip generation assuming each of these land use categories are provided on **Table 1** on the following page for weekdays, Saturdays, and Sundays.

Land Use Category	ITE Manual Land Use Code	Weekdays		Saturdays		Sundays	
		Trip Rate	Daily Trips (3 Units)	Trip Rate	Daily Trips (3 Units)	Trip Rate	Daily Trips (3 Units)
Single-Family Detached Housing	210	9.43	28	9.48	28	8.48	25
Single-Family Attached Housing	215	7.20	22	8.76	26	7.17	22
Multi-Family Housing (Low-Rise)	220	6.74	20	4.55	14	3.86	12
Recreational Home	260	3.55	11	3.44	11	2.96	9
Timeshare	265	8.63	26	7.34	22	6.01	18

Table 1 – Project Daily Trip Estimate Assuming Various Residential Categories

Single-Family Detached Housing (ITE Land Use Code 210) has the highest trip generation rate of the candidate residential land use categories. Based on this land use assumption, the 3-unit Project is expected to generate about 9.43 weekday trips per unit with a total of about 28 trips per day. For comparison, the Project is expected to generate about 8.63 weekday trips per unit based on the second highest Timeshare (ITE Land Use Code 265) trip rate, for a total of about 26 trips per day. Saturday and Sunday rates are included to indicate that they are like, or less than, weekday rates. Weekday rates, therefore, are reasonable for estimating Project trip generation.

Table 2 below provides a comparison with the Project operated as a 7-unit motel. This visitor-serving category is the most representative of lodging alternatives because it would not have a restaurant, conference facilities or on-site attractions that would independently generate traffic. It would therefore not be classified as any other lodging land use category in the ITE Trip Manual which include standard hotel, all-suites hotel, business hotel or resort hotel. Motel rates are provided based on the total number of rooms, some of which would be unoccupied on a typical day, as well as per occupied room, assuming full occupancy. The rate per total room is 3.35 trips per day for a total of 23 daily trips. Assuming full occupancy, the Project would be expected to generate about 4.37 trips per day for a total of 31 daily trips.

Land Use Category	ITE Manual Land Use Code	Weekdays		Saturdays		Sundays	
		Trip Rate	Daily Trips (7 Rooms)	Trip Rate	Daily Trips (7 Rooms)	Trip Rate	Daily Trips (7 Rooms)
Motel – per Total Room	320	3.35	23	3.35	23	3.35	23
Motel – per Occupied Room	320	4.37	31	4.37	31	4.37	31

Table 2 – Project Daily Trip Estimate Assuming 7-Room Motel

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The Project will generate about 28 daily trips assuming 3 vacation rentals, which is slightly more than the average annual trips and slightly less than the daily trips assuming full occupancy for a 7-unit motel. The differences are imperceptible.

As a worst case, **Table 3** below provides a comparison with the Project operated as a 7-unit hotel. Hotels include ancillary facilities such as restaurants, shops and conference facilities which require many more employees and deliveries and generate visitor trips independent of the guest rooms. The rate per total room is 7.99 trips per weekday for a total of 56 daily trips. Assuming full occupancy, the Project would be expected to generate about 12.23 trips per weekday for a total of 86 daily trips.

Land Use Category	ITE Manual Land Use Code	Weekdays		Saturdays		Sundays	
		Trip Rate	Daily Trips (7 Rooms)	Trip Rate	Daily Trips (7 Rooms)	Trip Rate	Daily Trips (7 Rooms)
Hotel – per Total Room	310	7.99	56	8.07	56	5.94	42
Hotel – per Occupied Room	310	12.23	86	10.05	31	7.83	55

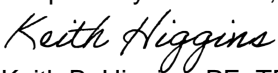
Table 3 – Project Daily Trip Estimate Assuming 7-Room Hotel

The Project trip generation will be between the use of 3 vacation rentals (Single Family Detached Housing) and 7 fully occupied hotel rooms resulting in between approximately 28 and 31 trips. This is substantially less than the 56 average annual trips and the maximum of 86 daily trips assuming full occupancy for a 7-unit hotel.

2. Project VMT Significance Threshold - The OPR Guidelines include criteria for determining if a development proposal will require further VMT analysis or if the proposal is below the significance threshold and exempt from additional analysis. The OPR Guidelines, page 12, states, “Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.”

3. Project VMT Analysis - The Project is estimated to generate about 28 vehicle trips per day assuming 3 rental units, a maximum of about 31 daily trips assuming a 7-unit motel and a maximum of about 86 daily trips assuming a 7-room full-service hotel. All possible land uses for the Project are below the 110 trips-per-day significance threshold. The Project will therefore have a less-than-significant VMT impact. No additional VMT analysis is required.

If you have any questions or need additional information, please do not hesitate to contact me. Thank you for the opportunity to assist you with this project.

Respectfully submitted,

 Keith B. Higgins, PE, TE

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